

Novomet: Environmental and Social Action Plan (ESAP): February 2014

Action	Timetable
Performance Standard 1: Environmental and Social Assessment and Management System	
Finalize Environmental, Health and Safety (EHS) Management Systems(MS) (including EHS reporting, fire protection and emergency response procedures) aligned with ISO 14001 and OHSAS 18001 and this Performance Standard (PS) for overseas service bases and foundry and the cable production plant. Undertake identification of EHS hazards and risks for international service bases and EHS mitigation measures and annual plans to be developed accordingly.	Within 6 months after new service base / foundry and cable production plant commencement
Appoint a corporate EHS manager (satisfactory to IFC) with responsibility and authority for all EHS matters across all overseas operations to ensure sufficient management support and resources to support EHS management at the level of the overseas subsidiaries allied to a consistent approach to such.	1 June 2014
Performance Standard 2: Labor and Working Conditions	
Develop Human Resources (HR) policies for the Russian operations and those outside of this country that specify rights of employees consistent with PS 2 (including but not limited to non-discrimination and equal opportunities, right to form labour unions, labour rights in case of retrenchment), and establish a grievance process to provide alternatives for employees to raise concerns other than to immediate supervisors; once established, this process should be formally communicated to all employees. In addition, the HR policy for contractors will be developed to address HR related issues associated with management of contractors to ensure compliance with PS2 requirements.	1 June 2014
To further improve occupational health and safety (OHS) performance: (a) Develop OHS inspection checklists for each facility in Russia, CIS and overseas to ensure the key issues (e.g. usage of PPEs, safe behavior, etc.) are properly addressed and recorded during regular internal inspections; (b) Implement OHS reporting by overseas operations to Novomet; (c) Carry out internal inspection to identify workplaces where additional signs on usage of PPEs are required and will display PPE signs where necessary	(a) (b) 1 April 2014; (c) 1 June 2014
Require contractors and suppliers involved in construction of the new foundry and cable production plants to include the requirement to comply with the requirements of PS 2 including that related to OHS to contract specifications.	Prior to construction works commencement
Performance Standard 3: Resource Efficiency and Pollution Prevention	

Conduct regular monitoring of air emission levels at point sources of significant process emissions and implement remedial measures for those which are not compliant with the WBG's Guideline i.e., WBG Guideline for Metal, plastic, and rubber products manufacturing. Confirm compliance with the ambient air quality at the boundary of the SPZ and where this is not the case implement mitigation measures to ensure compliance.	1 April 2014
Develop and implement Wastes Management and Hazardous Materials Management procedures for production plants and service bases in Russia, CIS and overseas aligned with the WBG EHS Guidelines. Wastewater management procedure should be developed for locations equipped with onsite wastewater storage tanks.	1 April 2014
Develop a corporate level procedure in respect to handling of radioactive equipment aligned with the WBG EHS Guidelines.	1 June 2014
Performance Standard 4: Community Health, Safety and Security	
Establish methods for control and communication of environmental and social aspects associated with current operations and in doing so develop a Stakeholder Engagement Plan (SEP) for its activities. The SEP will also define the approach to communications associated with development of new service bases and include a community grievance mechanism to be applied to all operations.	1 April 2014