

Environmental and Social Action Plan
ADA KLF Steel, Angola
April 2015

Action	Deadline
PS 1	
Environmental Management and Monitoring Plan for operation. Update to incorporate EHS requirements.	60 days after contract effective date
Develop the following:	
<ul style="list-style-type: none"> • EHS Policy 	Prior to contract signing
<ul style="list-style-type: none"> • Organization Chart for E&S Management (including OHS) 	Prior to contract signing
<ul style="list-style-type: none"> • Role Description and Responsibilities for those responsible for E&S Management (including OHS) 	30 days after contract effective date
Update the ESMS for Operations with procedures, plans and monitoring requirements for <ul style="list-style-type: none"> • Air Quality and CO2 emissions • Water consumption and water quality • Waste water • Noise • Solid Waste Management • Hazardous Materials and Hazardous Waste Management and disposal • Radiation monitoring • Supply chain management procedures including child labor and radiation screening of scrap steel • Spill Prevention and Response • Community Health and Safety Management • Security Management • Stakeholder Engagement Program (including Grievance Mechanism) • Community Development Program • Emergency Preparedness and Response including response to radiation alarms being triggered • Traffic management 	90 days after contract effective date
Appoint a full time EHS Officer to be based on site	30 days after contract effective date
Post the ESIA and EHS policy on the ADA website.	30 days after contract effective date
Submit copies of all operating permits and licenses	30 days after contract effective date
Provide copies of EIAs or other assessments done for the associated facilities; sub-station, transmission lines, diesel power plant. Confirm whether there was any resettlement, relocation or economic displacement involved.	30 days after contract effective date
Provide copies of EHS management and monitoring procedures for the associated facilities	60 days after contract effective date
PS 2	
Develop a Human Resources Policy and provide a copy of the HR manual	60 days after contract effective date

Action	Deadline
Develop an employee grievance mechanism. Publicize the mechanism and provide training to employees in use of mechanism	60 days after contract effective date
Develop OHS procedures and implement an OHS monitoring program	90 days after contract effective date
Supply Chain Review to identify risks and impacts in the supply chain and review current practices against the Performance Standards. This review will provide input to the 'Supply Chain Management Procedures' listed under PS1 above.	60 days after contract effective date
PS 3	
<i>Refer to the plans to be developed as part of the ESMP for Operations under PS1 above</i>	
PS 4	
Submit ADA Site Security Policy that is consistent with the requirements of PS4.	30 days after contract effective date
PS 5	
Submit a copy of the report on land use compensation	30 days after contract effective date
PS 8	
Submit copy of chance finds procedure	30 days after contract effective date