

Environmental and Social Action Plan
Kenya/Ethiopia: Stampede #36699

No.	Task Title/Description	Anticipated Completion Date	Indicator of Completion	Type of Action (PS)
1	The Company will enhance HSE capacity through i) an IFC PSSs focused training for senior management and operational teams; and (ii) hiring an Environmental, Social and Governance Manager.	12/31/2015	(i) Contract with consulting firm delivering training (ii) Name of appointed person	1
2	The Company will develop a Stakeholder Engagement Plans (SEP), for its Kenya and Ethiopia activities per the requirements of PS1.	12/31/2015	Deliver of SEP	1, 7
3	The Company will complete the additional requirements for Free Prior Informed Consent (FPIC), per the circumstances listed in PS7, and complete a mutually acceptable process between Company and affected community and provide evidence of an agreement between the two parties on the outcome of the negotiation	60 days prior to any project related civil works	(i) Provide evidence of an agreement between the two parties on the outcome of the negotiation (at each occurrence)	7
4	(i)The Company will develop an overarching human resource	12/31/2015	(ii) Deliver the HR policy;	2

	<p>policy (HR) for Kenya and Ethiopia, which will make reference to PS2 and ILO conventions, and will include associated country specific implementation procedures, (ii) The Company will develop a Retrenchment Framework Plan that aligns with the requirements of PS2 and that should be utilized in cases of collective dismissal by the Company and/or contractor/subcontractor, and (iii) The Company will develop and implement a formal internal grievance mechanism applicable to all employees and workers employed at Company's sites by contractors and sub-contractors.</p>		<p>(iii) Resettlement Framework, and (iv) Grievance mechanism</p>	
4	<p>The Company will prepare a security risk assessment and develop Security Management Plans that are aligned with PS 4. These will be reviewed and updated as the project evolves.</p>	12/31/2015	<p>Deliver the security risk assessment and security management plans. Provide the name of the security manager</p>	4
5	<p>(i) The Company will develop Land Acquisition and Livelihood Restoration Plans (LALRP) for each of the two countries (Kenya, Ethiopia), and (ii) the Company will redesign its compensation plan in Ethiopia to incorporate procedures to compensate prior</p>	<p>(i) 12/31/2015, and (ii) 06/30/2015</p>	<p>(i) Copy of LALRP), (ii) Management of Change for Ethiopia Compensation</p>	5

	to commencing work, vacating land and any potential damage that could occurred after seismic survey.			
6	(i)The Company will develop a biodiversity strategy for Kenya as described in the ESRS, and (ii) The company will develop a similar plan prior to any substantive work related to development of successful wells in Ethiopia.	(i) 03/31/2016; (ii) depending on development at least four months in advance	(i) and (ii) Strategy approved by IFC	6
7	The Company will prepare and submit ESIA's to IFC addressing local regulatory requirements and IFC PSs in any case where wells progress to production. These will be presented to IFC for review and approval at least four months prior to start of any substantive construction.	TBD in consultation with Company at least four months prior to start work	ESIA approved by IFC	1