



Independent Monitoring Group:

Third HSEC Monitoring Review

Africa Oil Corporation

23 March 2017

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For and on behalf of
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Date: 23 March 2017

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LIST OF ABBREVIATIONS

AOC	Africa Oil Corporation
AoI	Area of Influence
CLO	Community Liaison Officer
CPF	Central Processing Facility
CRC	Community Resource Centre
EDC	Enterprise Development Centre
EHS	Environment, Health and Safety
EHS MS	Environment, Health and Safety Management System
EHS MP	Environment, Health and Safety Management Plan
EOPS	Early Oil Pilot Scheme
ERM	Environmental Resources Management Ltd
ESAP	Environmental and Social Action Plan
ESRS	Environmental and Social Review Summary
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESG	Environmental and Social Governance
FEED	Front End Engineering Design
FFD	Full Field Development
FPIC	Free Prior Informed Consent
FTG	Full Tensiometer Gravity
GHG	Green House Gases
HR	Human Resources
HSEC	Health, Safety, Environment and Community
IFC	International Finance Corporation
IMG	Independent Monitoring Group
JV	Joint Venture
LALR	Land Acquisition and Livelihood Restoration
NMK	National Museums of Kenya
NEMA	National Environmental Management Authority
NGO	Non-Governmental Organisation
SEP	Stakeholder Engagement Plan
SCM	Supply Chain Management
SSA	Site Specific Assessment
SNNP	Southern Nations, Nationalities and Peoples
VSO	Village Socialisation Officer

EXECUTIVE SUMMARY

Africa Oil Corporation (AOC) is a Canada based oil and gas exploration and development company that has been active in Kenya and Ethiopia since 2009 when it acquired an interest in blocks in Kenya and Ethiopia. AOC's current interests include both operated assets (Rift Basin Area Block in Ethiopia and Block 9 in Kenya) and non-operated assets (Blocks 13T, 10BA, 10BB and 12A in Kenya and South Omo Block in Ethiopia). AOC's Joint Venture (JV) partner, Tullow Kenya and Tullow Ethiopia (Tullow) is Operator of the non-operated assets in Kenya and Ethiopia respectively. AOC is also in JVs with Maersk Oil and Gas and Delonex Energy for different operated and non-operated blocks in Kenya and Ethiopia.

AOC entered into an Equity Subscription Agreement with the International Finance Corporation (IFC) in August 2015 to finance its oil and gas exploration, appraisal and development activities in Kenya and Ethiopia. The agreement requires AOC (and its JV partners) to comply with the IFC Performance Standards on Environmental and Social Sustainability (2012) and undertake specific actions detailed in an Environmental and Social Action Plan (ESAP) and Environmental and Social Review Summary (ESRS).

Environmental Resources Management (ERM) was commissioned to act as the Independent Monitoring Group (IMG) which is a requirement for project that been classified by the IFC as Category A. The first IMG review was undertaken in December 2015 and the second review was undertaken in June 2016. This report presents the finding of the third review undertaken in January 2017. The third review involved review of documents provided by AOC and Tullow and a site visit covering a range of Tullow operational areas and interviews with staff from Tullow.

The Operator is continuing to actively manage the key risks and potential impacts identified through previous ESIA's, current ESIA's and direct experiences during the exploration and appraisal phases. There is however the requirement to finalise, approve and fully operationalise a number of important management systems, plans, procedures and guidance to ensure effective identification and management of environmental and social risks through an integrated Environmental and Social Management System.

There is a requirement for the Site Specific Assessment (SSA) Procedure to be fully embedded in the site selection, site assessment and EHS management process with activities and decisions documented. A documented and approved SSA needs to be a pre-requisite for the commencement of site activities that entail land disturbance at new locations such as at well pads, roads, camps, laydown areas and other support infrastructure.

This is of particular importance in preparation for increase operational activities associated with further planned exploration and appraisal and for

progress with Full Field Development, when there will be multiple activities occurring at the same time and larger numbers of contractors and workers on the operations sites.

There are no AOC operated activities planned in Kenya and Ethiopia over the next six month review period. The draft ESG Framework documents and any procedures that are developed for operations planned for later in 2017 will be reviewed within the next review period along with an assessment of progress against relevant AOC ESAP/ESRS requirements.

The focus of the next review is again likely to be on the South Lokichar Basin, as AOC has withdrawn from Block 12A as of 31 March 2017, as well as the developing EOPS ESIA and the Full Field Development ESIA. A key element of this will be reviewing progress in finalising relevant systems, plans, procedures and guidance and embedding these as controlled EHS management documents.

1 INTRODUCTION

1.1 BACKGROUND

In August 2015 *Africa Oil Corporation (AOC)* entered into an Equity Subscription Agreement with the International Finance Corporation (IFC) for financing to support its oil and gas exploration, appraisal and development activities in Kenya and Ethiopia. The agreement included a requirement for AOC to comply with the IFC Performance Standards on Environmental and Social Sustainability (the Performance Standards) and to undertake specific actions detailed in an Environmental and Social Action Plan (ESAP) developed by the IFC and based on the IFC's Environmental and Social Review Summary (ESRS) of AOC's activities that followed the initial IFC site visit in June 2015.

Environmental Resources Management (ERM) was commissioned by AOC and the IFC to act as the Independent Monitoring Group (IMG) ⁽¹⁾. The role of the IMG is to conduct a review of Health, Safety, Environment and Community (HSEC) aspects associated with AOC's activities related to oil and gas exploration, appraisal and development in Kenya and Ethiopia with respect to IFC's environmental and social requirements. Reviews will be conducted every six months during the exploration and development activities, and annually during the production phase. The first IMG review was undertaken in December 2015, the second review was undertaken in July 2016 and this report covers the finding of the third review undertaken in January 2017.

1.2 SCOPE OF THE REVIEW

AOC's current interests in Kenya and Ethiopia include both 'operated assets', where AOC leads development activities and 'non-operated assets', where development activities are led by another partner in the joint venture. At the time of the previous and current reviews, there were no activities in AOC operated assets in Ethiopia and Kenya. For the purposes of evaluating operational performance the focus of these IMGs review has therefore been directed at activities in non-operated assets in the South Lokichar Basin and the Kerio Basin in Kenya where Tullow is the operator ⁽²⁾.

It is recognised that progress across the various AOC and JV operated blocks has been delayed over the previous review periods due to issues related to the low oil price and delays in the upstream field development and midstream pipeline projects.

(1) As required for projects classified by the IFC as Category A (projects expected to have significant adverse social and/or environmental impacts that are diverse, irreversible, or unprecedented).

(2) Note that AOC has announced that it is relinquishing its rights in Block 12A and is withdrawing from the Joint Operating Agreement and Production Sharing Contract, effective from 31 March 2017.

1.2.1

Objectives

The overall objective of the reviews is to identify areas of non-conformance ⁽¹⁾ within the review framework and to make recommendations for corrective actions or improvements in line with Good International Industry Practice (GIIP). The reviews to date have covered the following areas.

- Progress against the agreed AOC ESAP and ESRS requirements.
- Tullow Kenya operational-level HSEC management plans and procedures.
- Tullow Kenya operational performance where Tullow is the Operator.

The objectives of future reviews will vary depending on activities being undertaken, *eg* for activities in other blocks in Kenya and Ethiopia or where AOC is the operator.

1.2.2

Approach

The approach taken for the review was as follows.

- Conduct a desk-top review of documentation on the social and environmental risks; HSEC policies, plans and procedures; stakeholder engagement plans; land access plans; and associated studies and reports.
- Conduct a site visit to visually assess representative operations, interview Operator staff, affected communities and other stakeholders.
- Review additional documentation/information provided during the site visit and report the review findings.

This review report builds on the previous IMG review reports, updating information where required. Where appropriate, information in the previous IMG review is referenced to avoid unnecessary repetition. The review methodology and action tracking procedure is presented in *Chapter 3*.

1.2.3

Review Period

This review covers the activities in progress between the second review in July 2016 and the current review in January 2017. Reference is made in this report to the 'next review period', which would cover the approximately six month period from January 2017 to the next review, likely to be in June or July 2017. The national election scheduled to be held in Kenya in August 2017 may restrict the scope for site visits in June /July therefore a desk-based only review may be undertaken at this stage with a site visit scheduled in the subsequent review period.

(1) The term 'conformance' relates to specific legal and regulatory measures where compliance can be measured as well as performance standards that are outcome-based.

1.3 *IMG REVIEW TEAM*

The ERM IMG field team comprised three consultants.

- Mark Irvine: Team Leader and Environmental Specialist.
- David Nicholson: Biodiversity Specialist.
- Callie Phillips: Social and Health Specialist.

The ERM team conducted a review of documentation and systems, conducted discussions with functional leads and attended the site visit. The ERM team were supported by other ERM subject matter experts on a consultative basis for document review and reporting.

1.4 *LIMITATIONS*

The findings of this review are based on the Scope of the Review as described above. ERM performed these services in a manner consistent with the normal level of care and expertise exercised by members of the planning and environmental consulting profession. The work is based primarily upon documents produced and studies performed by third parties, and interviews, discussions and observations over the five day period of the country visit. With regard to information provided by AOC, Tullow Kenya and their representatives, ERM has used such information in good faith and with verification limited to the site visit and as detailed in this report. The assessment and recommendations made are based on professional judgement drawing from the available information and within the limits of the budget and schedule. The information provided in this report should be considered as technical input and not as legal advice.

1.5 *REPORT STRUCTURE*

The remainder of this review report is structured as follows.

- *Section 2* summarises the key AOC and JV assets and status of activities.
- *Section 3* outlines the assessment framework and applicable standards.
- *Section 4* presents an assessment of the progress against the AOC ESAP and ESRS requirements.
- *Section 5* presents the findings of the review with respect to the IFC Performance Standards and recommended actions.
- *Section 6:* presents the conclusions and recommendations for the next review.

The review is supported by the following annexes.

Annex A: IMG January 2017 Site Visit Programme.

Annex B: List of Additional Documents Provided by AOC and Tullow Kenya Relevant to Current Activities.

2.1 COMPANY ASSETS

Details of Company and Joint Venture assets have been provided in the previous reviews and an update of assets and activities is provided here. Current Licence blocks in Kenya and Ethiopia referred to in this review are shown in *Figure 2.1*.

2.1.1 Operated Assets

Kenya

AOC is the Operator of Block 9 in Kenya. AOC previously conducted exploration activities that included seismic survey over approximately 1,500 km of survey lines and drilling of three exploration wells. AOC's licence period for Block 9 has been extended by the Government of Kenya until June 2017 to allow for further evaluation of the data from the previous exploration activities.

Ethiopia

AOC is the Operator of the Rift Basin Area Block in a joint venture with Maersk. Airborne gravity gradient surveys and a 2D seismic survey covering approximately 600 km of survey lines was completed within the Block in 2015. The Government of Ethiopia granted an extension of the license until February 2017 to allow AOC to evaluate exploration data and make a decision on further activities, eg further seismic surveys or exploratory drilling. This has now been further extended to the end of 2017.

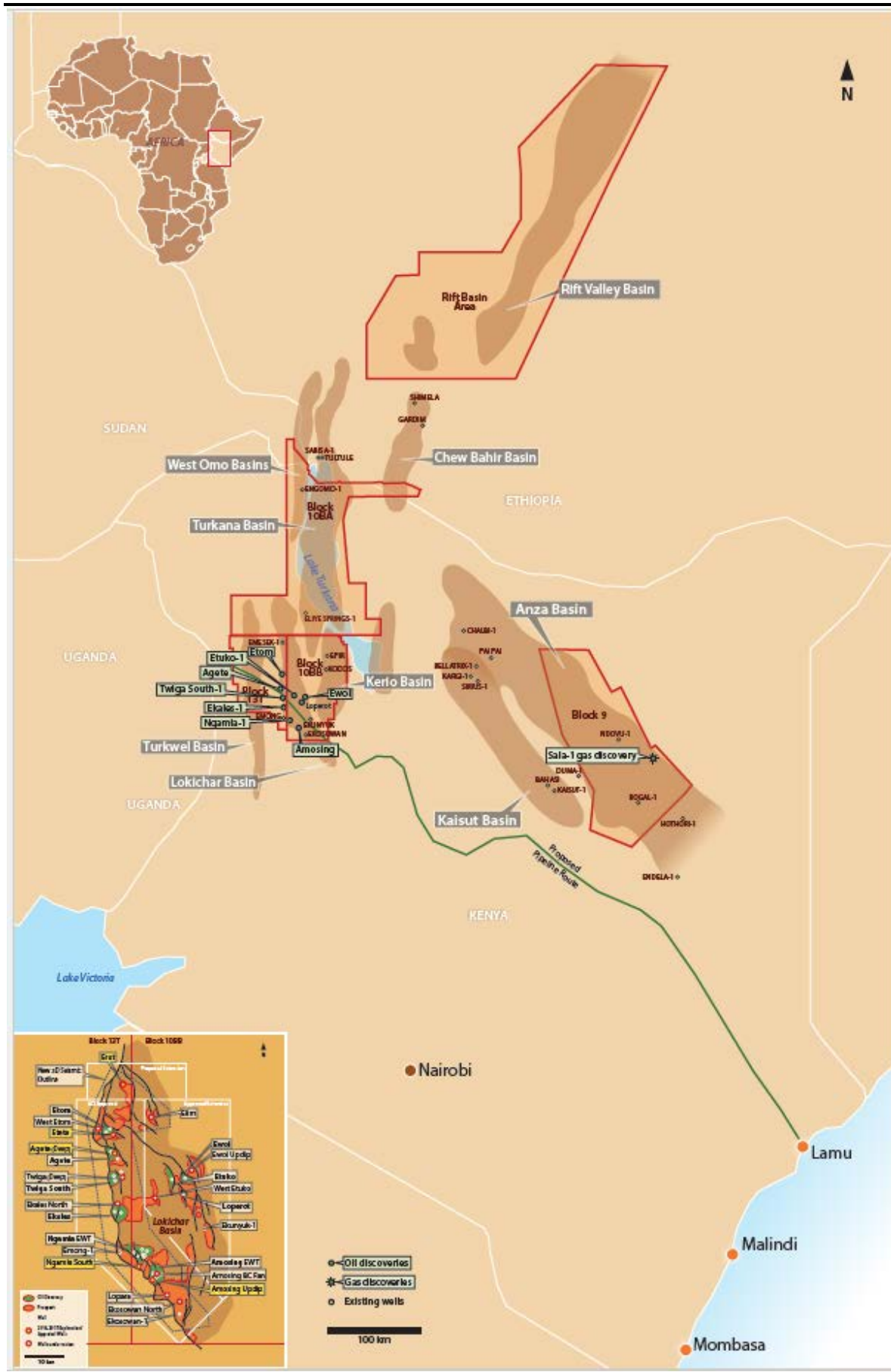
2.1.2 Non-Operated Assets

Kenya

Non-operated assets in Kenya include Blocks 10BA, 13T and 10BB in Turkana County, and Block 12A encompassing parts of Turkana, Samburu, Laikipia, Baringo, Elgeyo Marakwet and West Pokot Counties. The assets are operated by Tullow Kenya in a JV with AOC and Maersk. Block 12A is operated by Tullow in a JV with AOC and Delonex ⁽¹⁾. Further details of activities in these blocks are presented below.

(1) Note that AOC has announced that it is relinquishing its rights in Block 12A and is withdrawing from the Joint Operating Agreement and Production Sharing Contract, effective from 31 March 2017.

Figure 2.1 Licence Blocks and Wells in Ethiopia and Kenya



Source: Africa Oil Corporation (March 2017)

Ethiopia

The non-operated asset in Ethiopia is the Tullow-operated South Omo Block located in the Southern Rift Basin in the southwest of the country (in a JV with AOC and Delonex). Seismic surveys have been completed in the block and four wells have been drilled to date, however, there are currently no activities in the block. The Government of Ethiopia has extended the licence until the end of 2017 to allow for further evaluation of geological data to make a decision whether to undertake further exploration activities.

2.2 SOUTH LOKICHAR BASIN EXPLORATION, APPRAISAL & DEVELOPMENT

For the purposes of this report, the South Lokichar Basin comprises Blocks 13T, 10BB and 10BA. A description of the activities associated with the development of the South Lokichar Basin along with the environmental and social context was provided in the previous IMG reviews so is not repeated here other than a brief summary of the key components and an update on the midstream component.

2.2.1 South Lokichar Exploration and Appraisal

The discoveries in the South Lokichar Basin indicate oil reserves of 750 million barrels. In Blocks 10BB and 13T the JV has been given a three-year exploration extension to 18 September 2020. The JV has a firm programme to drill four exploration and appraisal wells in the South Lokichar Basin (located in Blocks 10BB and 13T) with the possibility of extending this by a further four wells. The first exploration well (Erut-1) was drilled in the fourth quarter of 2016 in Block 13T in the north of the basin. This resulted in a further oil discovery that is currently being assessed. Two appraisal wells in the Ngamia and Amosing fields in the south of the basin, followed by an exploration well at Etete in the north of the basin are planned for the first half of 2017.

Water injection tests are also being undertaken in the Ngamia and Amosing fields to collect data to optimise the field development plan.

2.2.2 South Lokichar Early Oil Pilot Scheme

Tullow are evaluating an Early Oil Pilot Scheme (EOPS) designed to produce 2,000 barrels of oil a day from a number of existing Amosing and Ngamia wells for a two-year period. In addition to producing oil for sale, the EOPS would help test the reservoir behaviour and the midstream process to inform the South Lokichar Full Field Development (FFD). The oil would be stored in the existing tanks at the Amosing and Ngamia Extended Well Test sites before being transported by road to oil storage, refinery and oil terminal facilities in Mombasa. An ESIA for the EOPS project is scheduled for completion in the second half of 2017.

2.2.3 *South Lokichar Full Field Development*

The JV is planning to develop the discoveries in phases to allow early production, and ongoing exploration and appraisal activities to run in parallel. The Phase 1 Project is likely to encompass a number of the Block 10BB and 13T discoveries and is currently undergoing pre-Front End Engineering Design (pre-FEED) concept studies to determine the location and design of the various project components. Pre-FEED is scheduled for completion mid-2017.

The Phase 1 Project is likely to comprise a series of well pads in different fields, interconnecting flowlines, a Central Processing Facility (CPF), and support facilities and infrastructure (eg roads, logistics base/storage areas, and power and water supply). An ESIA for the Phase 1 Project is due for completion during the third quarter of 2018 and will be submitted to the Kenyan National Environmental Management Authority (NEMA) for review and approval.

2.2.4 *Export Pipeline*

The Kenya JV Partners have signed an MoU with the Government of Kenya which confirms the intent of the parties to jointly progress the development of a crude oil export pipeline which will run from the planned CPF at South Lokichar to a marine export terminal that will be built at the Port of Lamu in Kenya. The pipeline Joint Development Agreement (JDA) is currently being finalised. The proposed standalone Kenyan export pipeline is expected to take into consideration potential links with other bordering countries in the future. No ESIA or FEED studies for this export pipeline have commenced within the last review period.

2.3 **BLOCK 12A EXPLORATION**

Block 12A is within the Kerio Basin area and is located within six counties in Kenya (Turkana, Samburu, Laikipia, Baringo, Elgeyo Marakwet and West Pokot) and is located south of the Lokichar Basin.

The JV has undertaken two phases of 2D seismic surveys in 2013/2014 covering 550 km of survey lines within Block 12A, covering parts of Baringo and Elgeyo Marakwet Counties. The first well in Block 12A in the Kerio Valley Basin (named Cheptuket-1) was drilled in early 2016. This well has been plugged and abandoned and the site returned to the landowners. A Full Tensiometer Gravity (FTG) survey over block 12A was undertaken in 2016 covering areas within Turkana, Baringo, Elgeyo Marakwet and West Pokot Counties to obtain information on the delineation of geological structures within the Kerio Valley Basin to inform future exploration decisions.

AOC has announced that it is relinquishing its rights in Block 12A and is withdrawing from the Joint Operating Agreement and Production Sharing Contract, effective from 31 March 2017. Findings related to Block 12A have

been included within this report as AOC held an interest in Block 12A at the time of the IMG visit. The Operator will consider findings and recommendations made to-date but Block 12A will not be included in future IMG reports.

2.4 SUMMARY OF ACTIVITIES IN EACH LICENCE BLOCK

A summary of the current status and main activities underway or planned for each of the licence blocks described above are presented in *Table 2.1*.

Table 2.1. Status and Current Activity in each Licence Block

Licence Block	Status	Current Activity
Operated Assets		
Block 9, Kenya	Licence period extended to June 2017 to allow for further evaluation of the data from the previous exploration activities.	No current activities.
Rift Basin Area Block, Ethiopia	Licence period extended to end of 2017 to allow evaluation of seismic data and decision to be made on further activities	No current activities.
Non Operated Assets		
Blocks 13T, 10BB and 10BA (South Lokichar Basin), Kenya	Licence period extended to September 2020 for blocks 10BB and 13T.	Four exploration and appraisal wells planned by the first half of 2017, with one (Erut-1) completed. Possibility of a further four wells.
	Approval being sought to progress with Early Oil Pilot Scheme (EOPS) to produce oil from a number of existing Amosing and Ngamia wells for a two-year period.	ESIA for the EOPS scheduled for completion in the second half of 2017.
	The South Lokichar Full Field Development Phase 1 Project is currently undergoing pre-Front End Engineering Design (pre-FEED) concept studies to determine the location and design of the various project components.	Pre-FEED scheduled for completion mid-2017. ESIA for the Phase 1 Project due for completion during the third quarter of 2018. Water injection tests being undertaken in the Ngamia and Amosing fields to optimise field development plan.
	MoU signed and Pipeline Joint Development Agreement being finalised with Government of Kenya to progress export pipeline from South Lokichar to Port of Lamu.	ESIA and FEED studies for export pipeline scheduled to commence in 2017.
Block 12A, Kenya	AOC relinquished its rights in Block 12A and withdrawing from the JOA and PSC, effective from 31 March 2017.	No current activities. Possible further seismic survey in 2017.
South Omo Block, Ethiopia	Seismic surveys have been completed and four wells have been drilled. Licence extended until end of 2017 to allow for further data evaluation and decision to be made on further activities.	No current Activities

3.1 ASSESSMENT FRAMEWORK

The IMG review of AOC's and Tullow's plans and activities was undertaken through a combination of document review, presentations, interviews and a site visit. The evaluation was undertaken against the following environmental and social standards.

- Environmental and social laws and regulations of Kenya in force at the time of the assessment.
- AOC's agreed ESAP and ESRS requirements (disclosed by IFC on 31 August 2015).
- IFC Performance Standards on Environmental and Social Sustainability (2012) (Performance Standards) and related policies including:
 - Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
 - Performance Standard 2: Labour and Working Conditions;
 - Performance Standard 3: Resource Efficiency and Pollution Prevention;
 - Performance Standard 4: Community Health, Safety and Security;
 - Performance Standard 5: Land Acquisition and Involuntary Resettlement;
 - Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
 - Performance Standard 7: Indigenous Peoples; and
 - Performance Standard 8: Cultural Heritage.

The review considered the sector-specific guidelines of the World Bank Group as referenced in the Performance Standards including:

- General Environmental, Health and Safety General Guidelines (April 2007); and
- Environmental, Health, and Safety Guidelines for Onshore Oil and Gas Development (April 2007).

A summary of relevant Kenyan laws and regulations currently in force was provided in the first IMG review so is not repeated here. There are a number of pieces of emerging legislation relevant to oil and gas activities in Kenya. These include the following.

- *Community Land Act (2016)*;
- *Petroleum (Exploration, Development and Production) Bill (2015)*;
- *Natural Resources (Classes of Transactions Subject to Ratification) Bill (2015)*;
- *The Energy Bill (2015)*;
- *Land Laws (Amendment) Bill (2015)*.

Of note is the *Petroleum (Exploration, Development and Production) Bill*, which will establish a government authority to regulate, monitor, and supervise upstream petroleum operations. This Bill is currently going through parliamentary readings and it is not known if it will be enacted and come into force before or after the August 2017 elections.

3.2 *METHODOLOGY*

3.2.1 *Overview*

The IMG review comprised the following main activities.

- A review of relevant environmental and social documentation and information. Presentations were made by AOC and Tullow Kenya functional heads in Nairobi and in the field, and copies of presentations and related documents were provided.
- A site visit was conducted and visual observations were made of the areas directly and indirectly affected by the Operator's activities in Block 13T/10BB and Block 12A. Individuals responsible for Operator activities were interviewed in the field and a small number of discussions with community members and other stakeholders were held.
- Activities were evaluated against the reference framework to determine compliance with national laws and regulations, corporate requirements, and conformance with lender requirements. Recommendations were made where applicable to address deficiencies or to improve performance.

Details of the site visit and documents provided for review are presented in *Annex A* and *Annex B* respectively. The documents submitted for the previous IMG reviews are listed in the previous reports.

3.2.2 *Document Review and Presentations*

HSEC documents covering AOC's corporate management plans and Tullow Kenya's operational policies, procedures and plans were provided prior to and during the previous IMG site visits with updated and additional plans, procedures and associated documents provided prior to, during and immediately after the third IMG site visit.

A series of presentations were delivered to the IMG by AOC and Tullow Kenya outlining operations and HSEC issues and management plans. These covered the following main areas.

- Overview of AOC current and planned operations.
- Overview of Tullow Kenya Exploration and Appraisal Operations (South Lokichar Basin and Block 12A).
- Early Oil Pilot Scheme update and ESIA status.

- Pipeline update and ESIA status.
- Full Field Development ESIA status.
- IMG Review Action Tracking.
- Stakeholder Engagement.
- Land Access.
- Site Specific Assessments.
- Biodiversity.

In addition discussions were held with function heads on the following issues.

- Security and Asset Protection.
- Water Resources.
- Grievance mechanism.
- HSE audits.

3.2.3 *Site Visit and Interviews*

The in-country work covered a period of five days with a site visit conducted over approximately two days (from the morning of 24 January to late afternoon on the 25 January 2017). This included a tour of a number of the existing operational sites and the location of previous operational sites, including the following.

- Lokichar Tullow Oil Community Resource Centre (CRC) reinstatement tree nursery.
- Ngamia-5 Water Injection Test well site.
- Ngamia-8 Extended Well Test and EOPS production well site.
- Ngamia-10 new well pad under preparation.
- Nakukulas village: site of nursery and demonstration farm.
- Block 12A Cheptuket-1 well site at Chepsogot Location (removed and rehabilitation).
- Block 12A seismic survey line restoration site at Epke Location.

During the site visit discussions were held with Tullow and contractor representatives with operational responsibilities for the environmental, health and safety and community management planning, including Social Performance activities and Site Specific Assessments.

3.2.4 *Performance Evaluation*

The status of the findings and the overall performance was rated and evaluated according to the categories presented in *Table 3.1* and *Table 3.2*. The reporting format in this review has been updated from the previous two reviews to allow it to fit more easily into the Operator's action tracking framework.

Table 3.1. Status Ratings Used in the Review

Status Rating	Criteria	Action
When Required	Work to meet the requirements has not commenced as the relevant phase of the project has not started.	Workplan to be agreed prior to relevant phase commencing.
Open	Work to meet the requirements has not commenced. This may be because a new action has been identified	Workplan to be agreed with an agreed time period
In Progress	Work to meet requirements is in progress. Some parts of the requirements may be closed and others are planned within a defined time period.	Workplan to be completed with an agreed time period. Some items stated to have been completed may require verification before being closed.
Closed	Requirements have been fully met.	No further action required, but will require ongoing monitoring to ensure future compliance.

Table 3.2 Assessment Ratings Used in the Review

Assessment Rating	Criteria	Action
Recommendation	Issue or situation where performance could be improved to better meet good international industry practice.	Adoption of recommendations to be considered by Company as part of continuous improvement.
Requirement not met – Level I	Issue or situation not consistent with Applicable Standards or commitments but without an immediate risk or impact to resource or receptors.	Level I Non Conformances will be recorded, along with a recommendation for corrective action to the Company
Requirement not met – Level II	Issue or situation not consistent with Applicable Standards or Company commitments that has not yet resulted in clearly identified damage or irreversible ESHS impacts, but which requires immediate corrective action to prevent risk of impact to resources or receptors. Recurring issue or situation not consistent with Applicable Standards or Company commitments but without an immediate risk of impact to resource or receptors generally requiring systems-level corrective action.	Level II Non Conformances will generate a corrective action request, and will be recorded. Level II Non Conformances may result in a recommendation to ‘Stop Work’, in those situations where work activity presents ongoing ESHS risks.
Requirement not met – Level III	Issue or situation not consistent with Applicable Standards or Company commitments that has resulted in significant observed impact to resources or receptors, or which has a reasonable expectation of imminent damage or irreversible ESHS impacts, and which requires immediate corrective action. Action that indicates intentional disregard for Applicable Standards or Company commitments that has not necessarily resulted in significant impact, generally requiring systems-level corrective action.	Level III Non Conformances will result in a recommendation to the Company to ‘Stop Work’, which will be reported to IFC. The Company will agree a time-bound Action Plan to address the non-conformance to the satisfaction of the Independent Monitoring Group.

4.1 INTRODUCTION

AOC presented an update on progress to date against the IFC ESAP and ESRS requirements at a meeting with the IMG on the 23 January 2017. As agreed with the IFC, AOC have drafted a number of management plans, in the form of framework documents, outlining the requirements that would apply to any operational plans to be produced at a later date when AOC recommence field operations. These documents have been submitted to the IFC for review and a number have been commented on to date. The draft documents were submitted to the IMG for review prior to the current review.

4.2 CONFORMANCE WITH ESAP AND ESRS REQUIREMENTS

Table 4.1 presents the tasks identified in the AOC Master Action Plan together with reference to the agreed IFC ESAP and ESRS requirements, and the current status. It is recognised that the original anticipated completion date has passed for many action that are still to be completed, however, this is linked to the delays to commencement of operational activities.

The second IMG review recommended that AOC should organise its corporate EHS policy, plans and procedures into an EHS Management System with documents being controlled with relevant names, numbers and review cycles. A series of framework documents have been drafted and reviewed by the IFC and the IMG. Comments on the documents have been provided by the IMG and these are scheduled to be addressed and the document finalised within the next review period, or prior to the recommencement of operational activities, whichever is the sooner. These items are therefore assigned as 'in progress'. In addition, project-specific plans and procedures will be required prior to operations commencing in Block 9 or the Rift Basin Area Block. These items are assigned as 'when required'.

The ESAP and ESRS requirements relevant to the current and planned Tullow operations in the South Lokichar Development Project area are mainly closed, with some pending minor revisions to draft documents or completion of current ESIAs.

4.3 ADDITIONAL RECOMMENDATIONS

For the EOPS additional site-specific plans and procedures will be required to address the relevant ESAP and ESRS requirements where the current plans and procedures are specific to South Lokichar. These will need to be identified through the Operator's Risk Assessments and Site Specific Assessment Procedure, as appropriate.

Table 4.1 *Evaluation of ESAP and ESRS Requirements*

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
ESAP 1.1	The Company will enhance HSE capacity through i) an IFC Performance Standard focused training for senior management and operational teams	12/31/15	Closed	Training process established and training undertaken
ESAP 1.2	(ii) hiring an Environmental, Social and Governance Manager.	12/31/15	Closed	ESG Manager appointed 9 November 2015.
ESAP 2.1	The Company will develop Stakeholder Engagement Plans (SEP), for its Kenya and Ethiopia activities per the requirements of Performance Standard 1.	3/31/16	In progress	<p>Draft framework document has been produced and comments received from IFC. Documents to be finalised by next IMG Review.</p> <p>For the South Lokichar Basin development Tullow has prepared a Draft Stakeholder Engagement Framework and Pre-Development Stakeholder Engagement Plan. These have been approved by the IFC with only minor revisions required. This element of this action will be closed pending finalisation of the Framework expected by the end of Q1 2017.</p>
ESAP 2.2	Company to prepare and submit ESAs to IFC for review and approval – undertaken per project.	No date	When required	As there are no current activities where AOC are Operator this task is pending individual project initiation.
ESAP 3	The Company will complete the additional requirements for Free Prior Informed Consent (FPIC), per the circumstances listed in Performance Standard 7, 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	03/31/16	In progress	<p>As there are no current activities where AOC are Operator completion of this task for operated assets is pending individual project initiation. As this requirement is project specific it is dependent on the determination of the existence of and impacts on Indigenous Peoples in AOC’s area of operations as determined through the relevant ESIA processes.</p> <p>For the South Lokichar Basin development Tullow has prepared a Draft Stakeholder Engagement Framework that outlines the approach required to achieve and document FPIC based on the definition of the project footprint and specific impacts. This has been approved by the IFC with only minor revisions required. This element of this action will be closed pending finalisation of the Framework expected by the end of Q1 2017. This part of the requirement is in progress.</p>
ESAP 4a	The Company will develop an overarching human resource policy (HR) for Kenya and Ethiopia, which will make reference to Performance Standard 2 and ILO conventions, and will include	3/31/16	In progress	<p>Draft framework document has been produced and comments received from IFC. Documents to be finalised by next IMG Review.</p> <p>As there are no current activities where AOC are Operator country</p>

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
	associated country specific implementation procedures			<p>specific implementation procedures are pending individual project initiation.</p> <p>Tullow has an Employee's Handbook that includes a Human Resources Policy. This has been reviewed by the IFC and confirmed as acceptable. This part of the requirement is closed.</p>
	(ii) The Company will develop a Retrenchment Framework Plan that aligns with the requirements of Performance Standard 2 and that should be utilised in cases of collective dismissal by the Company and/or contractor/subcontractor	3/31/16	When required	<p>Retrenchment Framework Plans will be developed prior to commencement of relevant projects where staff/contractors are employed.</p> <p>Tullow follows national law and compliance with IFC requirements with regards to retrenchment and has prepared plans for previous retrenchment requirements. For any future retrenchment specific plans will be prepared.</p>
	(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.	3/31/16	In progress	<p>Draft framework documents have been produced and comments received from IFC. Documents to be finalised by next IMG Review</p> <p>Tullow has an Employee's Handbook that includes a Human Resources Policy. This has been reviewed by the IFC and confirmed as acceptable. This part of the requirement is closed.</p>
ESAP 4b	The Company will prepare a security risk assessment and develop Security Management Plans that are aligned with Performance Standard 4. These will be reviewed and updated as the project evolves.	3/31/16	In progress	<p>Draft framework document has been produced and finalisation is pending comments from IFC. Documents to be finalised by next IMG Review.</p> <p>As there are no current activities where AOC are Operator project specific plans will depend on individual project initiation. AOC will prepare and submit specific Security Management Plans prior to future operational activities.</p> <p>Tullow has prepared Security Management Plans for ongoing activities and submitted these and supporting studies to IFC for review and they have been confirmed as acceptable. This part of the requirement is closed.</p>
ESAP 5.1	The Company will develop Land Acquisition and Livelihood Restoration (LALR) Plans for each of the two countries (Kenya, Ethiopia).	3/31/16	In progress	<p>Draft framework document has been produced and comments received from IFC. Documents to be finalised by next IMG Review.</p> <p>As there are no current activities where AOC are Operator specific</p>

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
				<p>plans will depend on individual project initiation. AOC will prepare and submit specific LALR Plans for prior to future operational activities.</p> <p>Tullow has prepared a Draft Land Access Framework. This has been approved by the IFC with minor revisions required. Land access negotiations using this framework are ongoing for the current pre-development drilling operations. This element of the action will be closed pending finalisation of the Framework following consultations with the Government of Kenya and the Turkana County Government.</p>
ESAP 5.2	The Company will redesign its compensation plan in Ethiopia to incorporate procedures to compensate prior to commencing work, vacating land and any potential damage that could occurred after seismic survey.	07/31/16	Closed	Compensation Plan redesigned and the Management of Change provided to IFC as evidence.
ESAP 6.1	<p>(i) The Company will develop a biodiversity strategy for Kenya as described in the ESRS.</p> <p>(ii) The company will develop a similar plan prior to any substantive work related to development of successful wells in Ethiopia</p>	4/31/16	In progress	<p>Following IFC advice AOC has produced a draft framework document following the approach taken for the Tullow Biodiversity Management Framework. Documents to be finalised by next IMG Review at the end of the second quarter of 2017.</p> <p>As there are no current activities where AOC are Operator specific plans will depend on individual project initiation. AOC will prepare and submit specific Biodiversity Strategy (including establishing a Biodiversity Panel) prior to future operational activities.</p> <p>For blocks where Tullow is the Operator a Kenya Biodiversity Management Framework has been reviewed by the IFC and finalised. Following the Third IMG review the IFC advised that a Biodiversity Panel should be initiated to support Full Field Development decision making prior to completion of the FFD ESIA (scheduled for Q3 2018).</p>

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
ESAP 7	The Company will prepare and submit ESIA's to IFC addressing local regulatory requirements and IFC Performance Standards 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.	12/31/16	In Progress	<p>As there are no current activities where AOC are Operator this task is pending individual project initiation. AOC will prepare and submit ESIA's prior to future operational activities.</p> <p>Tullow have completed ESIA's for all activities currently underway and planned for 2017. An ESIA for the EOPS is expected to be completed in 2017 and the Upstream South Lokichar Development Project ESIA is expected to be completed during the third quarter of 2018.</p>
ESRS 1	PS3: Hydrogeological study of Ethiopian blocks if there is further operational activity	No Date	When required	<p>As there are no current activities where AOC are Operator this task is pending individual project initiation. AOC intends to complete such a study prior to commencement of any work and has sought clarification from the IFC on the detail of this requirement.</p>
ESRS 2	PS3: Quantify and report greenhouse gas (GHG) emissions for all activities	No Date	When required	<p>As there are no current activities where AOC are Operator this task is pending individual project initiation. AOC has developed a system for tracking GHG and commenced tracking of GHG at the start of 2016. Full implementation of this requirement is pending commencement of AOC Operator led activities.</p> <p>For blocks where Tullow is the Operator a data gathering and reporting mechanism is in place. This part of the requirement is closed.</p>
ESRS 3	PS 8: Ensure cultural heritage management plan is in place for future exploration and development activities	No Date	In progress	<p>Draft AOC Framework produced and comments received from IFC. Documents to be finalised by next IMG Review.</p> <p>For the South Lokichar Basin exploration, appraisal and development Tullow has a Cultural Heritage Management Procedure. This part of the requirement is closed.</p>

Note: grey shaded items are closed.

5.1 INTRODUCTION

As in the second IMG review, the focus of the third IMG review was the activities that have been undertaken and planned for the near future in the South Lokichar Development Project area ⁽¹⁾, and activities in Block 12A, and the systems and processes that the operator Tullow has in place and/or is developing.

Observations are presented on the progress that has been made since the last review to address the previous recommendations. Reference numbers for each observation under each Performance Standard are provided indicating under which review they were originally made (Review 1 as Rev1, Review 2 as Rev2, etc). New observations arising from the third IMG review have been added as required.

5.2 PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

5.2.1 Observations Related to Previous Review Findings

Environmental and Social Assessment Management Systems, Policy, Identification of Risks and Impacts, and Management Programmes (Rev1-PS1-1 and Rev2-PS1-1)

The first IMG review identified that the various project and company documents were a combination of controlled documents and uncontrolled documents and reports without authors' names, issue dates and revision/status. The second IMG review recommended that all documents relevant to conformance with IFC PS are listed within the overall project ESMP giving their name, reference number, revision number and review date so that these can be effectively tracked. These should include relevant HR documents on contractor management and grievance mechanisms.

Whilst some documents have been finalised and approved, a number of important management documents that are relevant to on-going field activities are still in draft form and it is not clear how these documents form an integrated Environmental and Social Assessment Management System for the assessment and management of current operational and future project risks.

Developing a more integrated management system and finalising and operationalising the related EHS management plans and procedures is now a priority to ensure effective management of project risks and impacts.

(1) The Development Project area means the area that includes the primary project site(s) and related facilities that the client (including its contractors) develops or controls.

Emergency Preparedness and Response (Rev1-PS1-3)

Emergency response plans and procedures, including *Incident Investigation Procedures*, are in place covering reportable incidents within operational sites. Information was provided by the Operator and feedback given by local stakeholders (both in the South Lokichar Basin and Block 12A) that emergency preparedness information has been provided to communities.

The requirement for a procedure to inform communities about risks and response measures in the event of an incident are addressed below under *Rev1-PS4-1: Emergency Response Plan*.

Stakeholder Engagement, Disclosure of Information and Grievance Mechanism (Rev1-PS1-4)

The previous IMG review identified that a more comprehensive pre-development community SEP was being prepared to better address community relationship issues in response to disruption to activities that occurred in 2013. In addition, the SEP was being revised to address the requirement for Free Prior Informed Consent (FPIC) as required under IFC Performance Standard 7, where this is applicable.

This document (the draft *Pre-development Community Stakeholder Engagement Plan for the South Lokichar Development Project*) presents more comprehensive and robust procedures for the development and management of relationships and provision of information to national and county government, local communities and other stakeholders. The draft SEP also addresses the issue of community engagement for the permanent land access that will be required for the development project. The draft SEP is being finalised and will be issued as a controlled document by the end of Q1 2017.

The previous IMG review identified that grievances for contractors were being channelled through the community grievance mechanism rather than through a specific contractor grievance channel. This issue is addressed below under *Formalisation of Worker Grievance Mechanism* (see Rev1-PS2-2).

Monitoring and Review (Rev1-PS1-5)

Recommendations were made in the previous IMG reviews that auditing and compliance procedures should be further developed so that they are more measurable and evidence based and linked to the Site Specific Assessment (SSA) procedure to improve transparency and accountability. The revised SSA Procedure (*T-KE-ESP-PRO-0003*) and example site-specific EMPs were provided for the current review.

The requirement to further improve the SSA Procedure is addressed in more detail under *Rev1-PS3-2* below.

5.2.2

Additional Observations

Organisational Competency, Capacity and Training (Rev-3 PS1-2)

The Operator is managing the E&S issues associated with on-going activities, however, increased capacity and on-going training will be required for the more intensive activities during the planned exploration and appraisal activities and the Full Field Development.

The Operator has reported that it undertakes an annual review of planned activities and likely resource requirements and training needs. This is reviewed and updated as required to address significant changes to work plans and resource and training needs. Resource planning and training process and documents will be reviewed as part of the next IMG Review.

Environmental and Social Assessment Management Systems, Policy, Identification of Risks and Impacts, and Management Programmes (Rev3-PS1-1 and Rev2-PS1-1)

During the third IMG review, the Operator conducted an inspection of a well pad being prepared at Amosing-6. It is understood that site scouting and community consultation had been completed, however, the well pad was being cleared without the SSA process being completed.

To comply with IFC PS 1, it is necessary for the SSA Procedure to be fully embedded in the site selection, site assessment and EHS management process with activities and decisions documented. A documented and approved SSA needs to be a pre-requisite for the commencement of site activities that entail land disturbance at new locations such as at well pads, roads, camps, laydown areas and other support infrastructure.

5.3

PERFORMANCE STANDARD 2: LABOUR AND WORKING CONDITIONS

5.3.1

Observations Related to Previous Review Findings

Contractor Management and Monitoring (Rev1-PS2-1)

At the first and second IMG reviews the issue of contractor management and performance monitoring was identified as a residual project risk. It was recommended that reviews of contractual agreements are undertaken to ensure performance measures and corrective measures that may be required to address non-compliance are captured in the agreements. The need for robust contractor management systems and performance indicators in contracts should be included in developing contracting guidelines and procedures.

During the third IMG review it was observed that the HR Guidelines for Contractors (1 July 2016) remains as a draft and has yet to be operationalised. It was reported during the current review that that development of HR

Contractor Standards will include consideration of Operator environmental and social requirements.

Formalisation of Worker Grievance Mechanism (Rev1-PS2-2)

The first IMG review recommended that Worker Councils should be formed to represent the different contractors, manage labour and working conditions, manage the relationship between Tullow and the workforce, and to participate in any grievance process, in line with the Grievance Management Guidelines, to avoid workers using the community grievance process.

Copies of the draft *Contractor Employee Grievance Management Guidelines* (dated 4 July 2016) and a copy of the draft *Workers Council Framework* (dated 7 July 2016) were provided to the IMG to address the gaps identified in the first IMG review.

It was noted in the second IMG review (Rev2-PS2-2) that the Grievance Mechanisms in the *Tullow Employee Handbook* and the draft *Contractor Employee Grievance Management Guidelines* that no reference is made to workers' rights to seek recourse in law if grievances cannot be settled through internal procedures. Whilst this right exists under Kenyan Law it is recommended that, as good practice, the grievance mechanisms and related contract documents are updated to specifically make reference to this right.

Whilst the draft *Workers Council Framework* is generally aligned with the requirements of IFC PS2, it is considered that the framework would benefit from additional detail outlining the scope, role and implementation of the Workers Councils. This should include guidance on minimal requirements on how often the various levels of workers councils should meet, how representatives will be selected and how issues will be taken forward from individual contractors workers councils to the joint workers council and then fed back to the employees and how the workers councils will interact with other worker management functions, Human Resources and Legal departments. This information is needed to provide transparency on the running of the council as currently it is unclear how the Workers Council will operate, especially for short term contractors or contractors with a limited number of people on site.

During the third IMG review *the HR Guidelines for Contractors* (1 July 2016), *Contractor Employee Grievance Management Guidelines* (dated 4 July 2016) and *Workers Council Framework* (dated 7 July 2016) all remain as drafts and have yet to be operationalised. As such, it is unclear how the various documents interact and in relation to the Workers Council if the measures are fully implementable.

5.3.2

Additional Observations

No additional observations were made during the third IMG review.

5.4 **PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION**

5.4.1 **Observations Related to Previous Review Findings**

Site Specific EHS Management Plans (Rev1-PS3-1)

The IMG identified during the first review that general management plans have been developed for block-wide operational requirements for various environmental elements. It was observed that these plans were not tailored for specific sites or operations and that site specific plans would enable specific risks to be identified and managed at a site specific level. During the second review, the IMG observed that a revised Site Specific Assessment (SSA) procedure was being developed that also included provision for the development of site specific EHS management plans (see response to *Rev1-PS3-2* and *Rev1-PS3-3* below).

Prior to the third IMG review, the IMG was provided with a copy of the revised draft SSA Procedure (*T-KE-ESP-PRO-0003*). The draft procedure includes a requirement to prepare site specific EHS management plans. The IMG was provided with two examples of such plans:

- *Kapese Integrated Operational Base Environment and Social Management Plan* dated May 2016; and
- *T-KE-ESP-PLN-0003 Water Injection Project Environmental Management and Monitoring Plan*.

Both of these plans provide site-specific operational requirements for EHS related issues.

Further work is required to finalise and operationalise the SSA Procedure to ensure that it includes adequate requirements for completing site specific EHS management plans prior to all work commencing on well pads, roads, storage areas, seismic lines etc (see below for additional requirements).

Site Specific Assessments (SSA) Criteria (Rev1-PS3-2) & Measurable HSE Components (Rev1-PS3-3)

Site specific assessments have been used to undertake environmental, social and cultural heritage assessments for exploration activities such as seismic surveys, construction of well pads and roads, and drilling operations that were not fully assessed during the block-wide ESIA's. The IMG recommended in the second review that the SSA procedure be updated to enable more site-specific and measurable assessments and to improve applicability, transparency and auditability.

A revised draft SSA Procedure and site specific EMP procedures were provided prior to the third IMG review. A review of the draft Procedure indicates that further work is required to include:

- description of the activities subject to assessment;
- a scoping process to identify the environmental and social elements necessary to be assessed;
- impact assessment methodology; and
- linkages with EMP and existing EHS procedures.

Given that activities are planned in Block 12A in the very near term (March/ April 2017), the SSA procedure needs to be finalised as a matter of priority to provide adequate assessment procedures and mitigation of potential impacts from these operations ⁽¹⁾.

Sediment and Erosion Control (Rev1-PS3-4)

The first IMG review recommended that a sediment and erosion control plan be developed for specific project activities and linked to the SSA procedures.

The IMG was informed during the second IMG review that the Operator's Civil Engineering Department are to include improved requirements in contracts to address erosion and sediment control at sites.

During the third IMG review, the Operator provided final *Line Clearance and Restoration Guidelines* (T-KE-EHS-GUD-0003 Rev02) that provides guidance on management of soil erosion from line clearance activities. The revised procedure describes the general requirements, however a key part of implementing these successfully will be the provision of training for field staff on the application of the Guidelines.

Sediment and Erosion Control (Rev2-PS3-4)

Observations were made during the second IMG review in Block 12A of sheet and gully erosion of soils along graded seismic lines that are the subject of current grievances from landowners. The Operator reported during the third IMG review that landowner grievances are being addressed through soil erosion protection measures. This is being undertaken in phases with erosion control methods being trialled to determine the applicability of various measures. The first trial has been completed in one area and the grievances have been resolved with affected landowners.

The rehabilitation of eroded sites was undertaken in conjunction with the local office of the Kenyan State Department of Agriculture. Measures observed in the field included the construction of rock gabion structures and the use of check banks and native plants to stabilise soil surfaces and gully erosion.

(1) Note that AOC has announced that it is relinquishing its rights in Block 12A and is withdrawing from the Joint Operating Agreement and Production Sharing Contract, effective from 31 March 2017. Findings related to Block 12A have been included within this report as AOC held an interest in Block 12A at the time of the IMG visit. The Operator will consider findings and recommendations made to date but Block 12A will not be included in future IMG reports.

The IMG recommends that the following refinement of the measures identified should be considered.

- Additional check drains across seismic lines are required to divert surface flow onto stable soil surfaces and away from existing drainage that concentrates water flow to form channels and gullies.
- Native plant establishment is required along seismic lines in patches (rather than rows) that cover the surface of the flow channels to stabilise the check drains. More than one stock grazing resistant species should be used. Limited fencing to exclude stock could also be used to protect plantings to encourage long-term establishment.
- Gabion structures should be benched into the side and bottom of gullies to form an 'open box' or U-shaped structure with the open face of the box facing the direction of flow.

Information on industry best practices is available to provide further guidance on these measures. Example guidance includes the following.

- West Virginia Department of Environment Protection (May 2012) *West Virginia Erosion and Sediment Control Manual*, Office of Oil and Gas Charleston WV.
- Ohio Department of Natural Resources (April 2005) *Best Management Practices For Oil and Gas Well Site Construction* Division of Mineral Resources.
- Montana Department of Environmental Quality (undated) *Stormwater Management for Oil and Gas Exploration and Development: Field Guide for Best Management Practices*.
- NSW Office of Environment and Heritage (2012) *Erosion and sediment control on unsealed roads: a field guide for erosion and sediment control maintenance practices* NSW Government, Sydney Australia.
- LandCom NSW (2004) *Managing Urban Stormwater: Soils and Construction* NSW Government, Sydney Australia.

5.4.2

Additional Observations

Consumption of Water and Energy (Rev 3-PS3-5)

During the second IMG review the Operator presented a summary of the water resources study that was being undertaken to assess the needs and water supply options for the long-term provision of water for the Full Field Development. The final decision will be informed by the FFD FEED, the FFD ESIA and will be subject to permitting approval.

Assessments of available options are provided in a series of technical hydrology studies and strategic option appraisal reports. The options were

evaluated during a series of option appraisal workshops informed by the technical studies, with the selection of the preferred option made on the basis that, overall, it provided the most secure, deliverable and sustainable option.

5.5 **PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY AND SECURITY**

5.5.1 **Observations Related to Previous Review Findings**

Emergency Response Plan (Rev1-PS4-1)

In the first IMG review it was recommended that the Operator's existing *Emergency Response Plan* be updated to include involvement of the community and local authorities when responding to emergency situations and that updates to the ERP be disclosed to local communities, as well as relevant government bodies (eg emergency services, healthcare facilities and police).

During the second IMG review a draft *Incident Management Provision: Briefing Note for External Stakeholders* was produced. This has been superseded in the third IMG review by the development of the Awareness and Preparedness for Emergencies at the Local Level (APELL) approach to involving communities and local authorities in emergency situations. The APELL approach is currently in development and to date has included the development of a draft risk assessment outlining the risks and hazards that may result in emergency situations in the community. Within the next review period it is expected that additional work will be undertaken to update and communicate the emergency response plans as the approach develops.

In addition, the Operator has developed a number of information leaflets for the community outlining potential hazards and responses and regarding community policing. These leaflets include illustrations and are likely to be of use to the Village Socialisation Officers and Community Liaison Officers when communicating with the community.

Health Profiles of Potentially Affected Communities

In the first IMG review a gap was identified in the documentation of health profiles of the potentially affected communities to understand the existing baseline conditions and the risk of community exposure to disease, including the potential impact of project activities on local communities such as workforce interaction with communities. It is understood that the ESIA currently being conducted for the FFD will address this requirement, and will provide input to further developing the Community, Health, Safety and Security Management Plan. The ESIA is due for completion by the third quarter of 2018.

5.5.2 **Additional Observations**

No additional observations were made during the third IMG review.

5.6 PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

5.6.1 Observations Related to Previous Review Findings

Free Prior and Informed Consent for Land Access (Rev1-PS5-1)

The first IMG review identified a gap within the existing *Land Access Procedure* regarding community engagement with respect to the requirements of Performance Standard 7 for documentation of Free, Prior and Informed Consent (FPIC) in land access engagements. This issue is addressed under PS 7 in *Section 5.8* below.

5.6.2 Additional Observations

It was reported by the Operator that the draft Land Access Framework for the South Lokichar Development Project is currently subject to consultation with the Government of Kenya and the Turkana County government and will finalised when these consultations are concluded. In the meantime, Tullow are using the draft Land Access Framework for the exploration and appraisal drilling sites. Tullow report that the framework is being used with access to sites being dependant on reaching agreement with communities regarding access to land. Examples of community agreements for recent land access for well pad access at Erut-1, Amosing-6 and Ngamia-10 were provided to the IMG.

5.7 PERFORMANCE STANDARD 6: BIODIVERSITY AND SUSTAINABLE MANAGEMENT OF LIVING RESOURCES

5.7.1 Observations Related to Previous Review Findings

Baseline Biodiversity and Habitat Assessment; Ecosystem Services Screening; Conservation Significance Mitigation; Biodiversity Action Plan; Invasive Species Management; Decommissioning and Restoration; Supply Chain Sustainability Assessment; and Monitoring and Evaluation Criteria (Rev1-PS6-1 to Rev1-PS6-8).

The IMG observed during the first IMG review that several elements of IFC PS6 were being assessed through the current ESIA for Phase 1 of the South Lokichar Development Project. The IMG was advised that the timetable to complete the ESIA is now the third quarter of 2018.

During the third IMG review, further information was provided on the approach being taken to identify Natural Habitat and Modified Habitat within the South Lokichar Basin and Block 12A exploration blocks. Work is ongoing in the South Lokichar Basin while activities in Block 12A have not been progressed. The IMG understands that further assessments are currently being undertaken to benchmark the condition of vegetation types within the landscape and to apply appropriate metrics to determine the current status of the habitat types. Remote sensing will be used to spatially delineate the

boundaries of the habitat types within both exploration blocks. It is understood that mapping will be completed within the first half of 2017.

Natural Habitat and Modified Habitat mapping should be completed to support further SSA assessments for exploration activities in South Lokichar and Block 12A.

Compliance with IFC Performance Standards in Exploration Blocks (Rev2-PS6-9)

During the second IMG review, it was observed in the field and through review of documentation that there may be gaps in the application of IFC Performance Standard 6 for exploration activities in licence blocks where the block-wide ESIA has not fully addressed biodiversity issues. During the third IMG site visit, the IMG was informed that SSA Procedures will be applied to align with the requirements of IFC PS6, including identifying likely locations of Natural Habitat based on baseline data, vegetation cover and field observations. Application of the SSA procedure in exploration blocks should occur prior to commencement of new activities in Block 12A and South Lokichar Basin blocks.

Given that exploration in these blocks is planned to commence as early as March/ April 2017 (in Block 12A), finalisation of the draft SSA procedure is a priority. Data inputs such as Natural Habitat and Modified Habitat mapping and invasive species management will be required to be completed in parallel as key inputs into the SSA procedure.

Restoration Activities (Rev2-PS6-10)

The IMG was informed during the first IMG review that the development of procedures and pilot studies to enhance land restoration were pending identifying a suitable scientific research partner. In the second IMG review it was advised that there were a limited number of sites that had been rehabilitated but as the development project progresses there would be a requirement to have a more detailed procedure for site rehabilitation to reduce net loss of habitats and grazing areas.

Prior to the third IMG review, the IMG was provided with the final Line Clearance and Restoration Guidelines T-KE-EHS-GUD-0003 REV02. The IMG notes that the requirements of the revised procedure are generally compliant however it is recommended that further work is required to refine site rehabilitation procedures. This should include further research and specifications for native indigenous species propagation; planting density and species mix; stock control measures; site reshaping and slope reinstatement; soil preparation and management; seasonal planting requirements; maintenance regimes and contingency plans. It is noted that the site rehabilitation measures will vary with different blocks given differences in topography, vegetation and climate between Block 12A and the South Lokichar blocks.

During the third IMG review site visit, the IMG observed that trial nursery facilities had been established at two locations in the South Lokichar blocks and local indigenous plants had been propagated. The IMG was also informed that the Operator was investigating taking on an intern to assist with undertaking trials for rehabilitation of disturbed sites. Ramp-up of nursery facilities should also be planned in order to cater for full field development. Involvement of the local community in establishing local enterprises to support site rehabilitation should also be considered.

Management of Invasive Species (Rev2-PS9-11)

During the second IMG review land was observed within Block 12A to contain infestations of the flowering plant *Lantana camara* (also known as tick berry or wild sage) which is listed as an invasive species in Kenya¹. In relation to future development in Block 12A, seismic lines may provide an opportunity for transmission of invasive species within the landscape and will require specific mitigation.

It is a requirement of IFC PS6 that the risk of introducing invasive species be assessed and managed, where appropriate, to reduce risks of further transmission and proliferation due to project related activities. The provisions of IFC PS6 require that Projects “*not intentionally introduce any new alien (invasive) species that are not currently established in the country or region of the project. If alien species are already established in the country or region of the proposed project, the project will exercise diligence in not spreading them into areas in which they have not already been established. As practicable, the client should take measures to eradicate such species from the Natural Habitats over which they have management control*”.

Prior to the third IMG site visit, the IMG was provided with a draft Invasive Species Management Procedure dated September 2016. IMG comments on this draft have been provided to the Operator. Finalisation of this procedure is recommended as a priority given that future seismic exploration activities in Block 12A may commence as early as March/April 2017.

5.7.2 *Additional Observations*

No additional observations were made during the third IMG review.

5.8 *PERFORMANCE STANDARD 7: INDIGENOUS PEOPLES*

5.8.1 *Observations Related to Previous Review Findings*

In the first IMG review, a gap was identified within the existing Land Access Procedure regarding documentation of Free, Prior and Informed Consent

¹ GISD (2006). Global Invasive Species Database online data sheet. *Lantana camara* (shrub). www.issg.org/database.

(FPIC). In specific locations such as Turkana, FPIC should be applied in the land acquisition process to address the particular social sensitivities. It was noted that elements of the FPIC were being undertaken, as the Operator already undertook detailed engagement when seeking the consent of the affected community during the land access process. However the existing documentation did not formalise or reference the FPIC process, and identify that obtaining community consent is a key objective of the procedures.

During the second IMG review a revised draft *Land Access Framework for the Project Development Phase of the South Lokichar Basin* (dated April 2016) was provided that included a revised approach to land access in Turkana County and makes specific reference to the FPIC requirement, including a draft template Consent Agreement.

Ongoing access to land for the current exploration and appraisal activities requires community consent and therefore, in Turkana, the requirement for FPIC will apply to these negotiations and agreements. Pending finalisation of the Land Access framework for the FFD the Land Access Framework for Project Development (Issue 4 2017) sets out the current land access process which includes procedures related to FPIC.

It was reported by the Operator that the draft Land Access Framework for the South Lokichar Development Project Phase 1 is currently subject to consultation with the Government of Kenya and the Turkana Country government and will be finalised when these consultations are concluded.

In addition, the revised draft *Pre-Development Stakeholder Engagement Plan for the South Lokichar Basin* now includes specific details of the FPIC process that has been adopted and the circumstances where it applies. The draft SEP is being finalised and will be issued as a controlled document, currently scheduled for the end of Q1 2017.

5.8.2 Additional Observations

No additional observations were made during the third IMG review.

5.9 PERFORMANCE STANDARD 8: CULTURAL HERITAGE

5.9.1 Observations Related to Previous Review Findings

Cultural Heritage Training (Rev1-PS8-1)

The first IMG review identified that although overarching management measures are in place, the site specific assessment is not being applied to road development activities and as such no determination of the need for a *Cultural Heritage Management Plan* was being made. It was further recommended that ongoing training is required for field staff in assessing cultural heritage issues during SSAs and during field operations.

Version 3 of the draft SSA procedure (T-KE-ESP-PRO-0003) requires consideration of roads and other supporting infrastructure as well as requirements for training and to work with NMK and/or TBI, as required. While training has been provided to contractors there will be a need for ongoing training and involvement of NMK and TBI to meet the requirements of the procedure in practice.

5.9.2 *Additional Observations*

Relocation/Management of Cultural Sites Procedure (Rev3-PS8-2)

Within Turkana, shallow graves are usually constructed close to trees or shrubs and then covered with branches and sometimes a few stones. There are no communal grave sites and people do not typically formally record the location of grave sites which, for practical reasons, are typically located away from settlements. Over time the branches and stones covering the grave sites can get dispersed therefore the location of older grave sites are hard to validate and locating sites depends on the collective memory of the community, usually through the elders or affected family members. As such, there is the potential, even following the SSA, associated community consultations and agreement that there are no grave sites, for other community members to indicate to the Operator that graves are present in the proposed area of operation, although the precise location may not be known.

During this reporting period this issue arose. The newly opened well pad at Amosing-6 had been subject to a SSA and Land Access Agreement and during this time the community had not mentioned the presence of a grave site. However, during the demarcation of the site, two community members came forward to report the potential presence of a grave within the footprint of the site. Due to the issues mentioned above the exact location of the grave within the site was not known. The Operator engaged with the affected people who sought compensation for the loss of the grave site. In this case the Operator was able to demarcate the area where the affected people indicated the grave may be located to avoid damage to the grave. The area for the well pad was adjusted to avoid this location and work commenced. As such, there were no impacts to the grave site within the well pad. A grievance was raised by two community members regarding the presence of a grave site and following cleansing ceremony at the site the grievance was closed out.

Regardless, as more sites are opened there is the potential, even following the SSA and Land Consent Agreements, that community members may indicate the presence of graves, or other sacred sites, within the footprint of the Operator's activities. In the absence of visual and / or physical indicators of these sites the existing Chance Finds Procedure is unlikely to lead to their identification.

The Operator may not always be able to avoid gravesites, or other locally important sacred sites therefore there is a requirement for the provision of

compensation and/ or other ceremonies to relocate these sites or allow them to be disturbed (including disturbances to sense of place, ancestors spirits etc). The Operator should therefore develop a separate procedure (or modify the Chance Finds Procedure within the existing Cultural Heritage Management Procedure) for relocating and / or disturbing grave sites to ensure that this is undertaken in a manner that is fair, transparent and culturally appropriate. In developing this procedure, the Operator should engage with communities to determine what traditional practices/ ceremonies apply when graves and other sacred sites need to be relocated or are disturbed. These will then need to be adopted into the procedure.

Table 5.1 Evaluation of IFC Performance Standard Requirements

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
Performance Standard 1 Assessment and Management of Environmental and Social Risks and Impacts						
Dec 2015 Rev1-PS1-1	<i>Environmental and Social Assessment Management Systems, Policy, Identification of Risks and Impacts, and Management Programmes</i>	The first IMG review identified that the various project and company documents were a combination of controlled documents and uncontrolled documents and reports without authors' names, issue dates and revision/ status.	EHS policy, plans and procedures should be controlled through an overall Project EHS Management System. Documents should be assigned document numbers, dated, signed off and have a review date. A comprehensive EHS document register listing the in-date controlled documents, the planned review cycle and the status of supporting documents would be a first step in this process.	Operator HSE and SP Teams with respect to their relevant operations. End of Q2 2017	In Progress Whilst some project documents have been finalised and approved there is no overall document control system in place to manage and monitor progress in finalising procedures and documents.	Level II Immediate corrective action required to prevent risk of impact to resources or receptors.
Jun 2016 Rev2-PS1-1		In the second IMG review it was further recommended that all documents relevant to conformance with IFC PS are listed within the overall ESMP. The Operator indicated that the majority of documents relevant to the South Lokichar Development Project will be available within the next review period and will therefore form part of future IMG reviews.	All management documents relevant to conformance with IFC PS should be listed within an overall Project ESMP giving their name, reference number, revision number and review date so that these can be effectively tracked. In addition to HSEC management documents the list should include relevant Human Resource, Grievance Mechanism and Contractor Management documents	Operator HSE and SP Teams with respect to their relevant operations. End of Q2 2017	In Progress There remain a number of important management documents that are relevant to on-going field activities that are still in draft form and not yet operationalised.	Level II Immediate corrective action required to prevent risk of impact to resources or receptors.
Jan 2017 Rev3-PS1-1	<i>Environmental and Social Assessment Management Systems, Policy, Identification of Risks and Impacts, and</i>	During the third IMG review, the Operator conducted an inspection of a well pad being prepared in the South Lokichar blocks. It is understood that site scouting and community consultation had been completed, however,	Company will ensure that SSA are implemented prior to ground breaking for all sites	Operator HSE Teams. TBC	Open	Level II Immediate corrective action required to prevent risk of impact to resources or

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
	<i>Management Programmes</i>	the well pad was being cleared without the SSA process being completed.				receptors.
Dec 1015 Rev1-PS1-2	<i>Organisational Competency, Capacity and Training</i>	The Operator has a detailed programme of training and capacity building across all HSEC areas including health and safety, technical, cultural heritage and cultural awareness. A detailed log of training received by each employee/contractor is maintained.	The Operator is managing the issues associated with on-going activities well, however, increased capacity and on-going training is recommended for the more intensive activities during the Development Project.	Operator HR Department	Closed Operator competency, capacity and training meets current requirements	Recommendation
Jan 2017 Rev3-PS1-2	<i>Organisational Competency, Capacity and Training</i>	The Operator reported that an annual review of planned activities, resource requirements and training needs is undertaken and that the requirements are reviewed when there are significant changes to planned activities. It is noted that increased capacity and on-going training will be required for the more intensive activities during the Development Project.	Operator will ensure that resources plans and training are documented are updated in response to changes. Resource planning and training documents will be reviewed as part of the next IMG Review.	Operator HR Department End of Q2 2017	Open Need evidence of a process to plan for adequate resources as the E&A and FFD project progresses	Recommendation
Dec 2015 Rev1-PS1-3	<i>Emergency Preparedness and Response</i>	The requirement for a procedure to inform communities about risks and response measures in the event of an incident was identified.	Community engagement as part of the SSA procedure is recommended to inform communities of risks where accidents and emergencies may occur, potential impacts and response procedures, including community communication. This should be extended to cover potential road transport incidents and other offsite emergencies.		Closed Addressed under <i>Rev1-PS4-1: Emergency Response Plan.</i>	Recommendation
Dec 2015	<i>Stakeholder Engagement,</i>	SSAs include the requirement for consultations with affected	Outcomes of future SSAs undertaken for site specific	Operator SP Team	In Progress Revised SSA procedure	Level II

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
Rev1-PS1-4	<i>Disclosure of Information and Grievance Mechanism</i>	communities.	activities should be disclosed to neighbouring communities and other stakeholders with an interest in EHS issues.	Revised SSA Procedure to be finalised by the end of Q1 2017.	undergoing development and review	Immediate corrective action required to prevent risk of impact to resources or receptors.
		The previous IMG review identified that grievances for contractors were being channelled through the community grievance mechanism rather than through a specific contractor grievance channel.	The Grievance Mechanism for contractors needs to be improved and communicated to all contractor employees.	Operator HR Department	Closed This issue is addressed below under <i>Formalisation of Worker Grievance Mechanism</i> (see Rev1-PS2-2).	Recommendation
Dec 2015 Rev1-PS1-5	<i>Monitoring and Review</i>	Recommendations were made in the previous IMG reviews that auditing and compliance procedures should be further developed so that they are more measurable and evidence based and linked to the SSAs procedures to improve transparency and accountability.	Refinement of auditing and compliance procedures should be considered to be more measurable and evidence based. Based on improved criteria included in SSAs and site specific EHS MPs, auditing and compliance assessments could move to a measurable and evidence based approach, reducing subjective judgments on compliance.	Operator EHS Team Revised SSA Procedure to be finalised by the end of Q1 2017.	In Progress Revised SSA procedure undergoing further development and review	Level II Immediate corrective action required to prevent risk of impact to resources or receptors.
Performance Standard 2 Labour and Working Conditions						
Dec 2015 Rev1-PS2-1	<i>Contractor Management and Monitoring</i>	Previous reviews of contractor management and performance monitoring was identified as a residual project risk.	Existing contractual agreements should be reviewed to ensure that contractor performance requirements are captured within the agreements, as well as detailing corrective measures that may be required to address any non-compliance. Training sessions for contractor holders are required to ensure that	Operator Above Ground Risk Integration and Performance Manager End of Q2 2017	In Progress A Contractor Management strategy along with Contracting Guidelines and Procedures are currently under development and are yet to be operationalised. Training for contract holders was undertaken in December 2016. Additional	Level II Immediate corrective action required to prevent risk of impact to resources or receptors.

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
			they have the capacity and resources to manage and monitor contractor performance. Training should include an identification of any gaps in capability to manage contractors, as well as development of measures required to fill these gaps.		KPIs around training currently being developed. It is expected that these documents will be finalised and issued as controlled documents within the next 6 month review period.	
Dec 2015 Rev1-PS2-2	<i>Formalisation of Worker Grievance Mechanism</i>	Measures are not in place to manage worker grievances associated with contractors on site and to enable communication between the workforce and the operator.	Worker Councils should be formed to represent the different contractors, and provide a functional worker grievance mechanism.	Operator HR Department End of Q2 2017	In Progress Contractor Employee Grievance Management Guidelines and Workers Council Framework have been drafted but not operationalised. Ongoing monitoring of implementation will then be required	Level I Action required to address this issue to avoid future risks
Rev2 PS2-2		It is noted the grievance mechanisms in the <i>Tullow Employee Handbook</i> and the draft <i>Contractor Employee Grievance Management Guidelines</i> that no reference is made to workers' rights to seek recourse in law if grievances cannot be settled through internal procedures.	Whilst workers have this right under Kenyan law it is recommended that the <i>Tullow employee handbook</i> and the grievance mechanisms are updated to specifically address this requirement.	Operator HR Department End of Q2 2017	In Progress The requirement for a <i>Contractor Employee Grievance Mechanism</i> is included in the <i>Draft HR Guidelines for Contractors</i> . Reference to legal recourse is not explicit in the documents. Both these documents and the <i>Workers Council Framework</i> are in draft and it is unclear how the documents interact.	Level I Action required to address this issue to avoid future risks
		The draft <i>Workers Council Framework</i> is generally aligned with the requirements of IFC PS2.	The draft framework needs to be updated to include details on the scope, role and how the Workers Council will function practically. This will set out the Terms of Reference for the Council and help ensure it achieves its objectives.	Operator HR Department End of Q2 2017	Workers Council Framework has not been operationalised.	
Dec 2015	<i>Internal Communication</i>	An internal communication procedure regarding	Develop and formalise a procedure to ensure that there is internal	Operator HR Department	Closed New Request for Approval	Recommendation

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
Rev1-PS2-3	<i>Procedure</i>	recruitment was not in place.	communication and feedback between the various internal departments and the HR Department. The procedure should include requirements for all departments to notify the HR department of any planned recruitment. Use of the Monday morning briefing meetings was recommended as one of the mechanisms to inform the HR Department of any planned recruitment.		to Hire Form addresses the issue	
Performance Standard 3 Resource Efficiency and Pollution Prevention						
Dec 2015 Rev1-PS3-1	<i>Site Specific EHS Management Plans</i>	The IMG identified during the first review that general management plans have been developed for block wide/operational requirements for various environmental elements. It was observed that these plans were not tailored for specific sites or operations and that site specific plans would enable specific risks to be identified and managed at a site specific level	Site specific EHS MPs for all well pads, camps, roads, seismic surveys and other significant operations are required. These should be linked to the developing SSA procedure (see Rev1-PS3-3 below).	Operator EHS Team A format for site specific EHS MPs are required and to be linked with the outcomes of the revised SSA Procedure and other existing EHS procedures. Format for EHS MPs to be finalised by the end of Q1 2017.	In Progress Draft Version 3 of the SSA Procedure provided to IMG for review. Additional comments on this version provided by IMG	Level II Immediate corrective action now required to prevent risk of impact to resources or receptors.
Dec 2015 Rev1-PS3-2	<i>SSA Criteria</i>	During the first IMG visit, it was observed that the road network established within blocks required assessments using the SSA Procedure. Appropriate road design standards are also required for	Company will ensure that the SSA Procedures references relevant design criteria and appropriate management practices specific to the activity for which the SSA is being undertaken. The relevant standards will be appended to each	Operator EHS Team Revised SSA Procedure to be finalised by the end of Q1 2017.	In Progress Draft SSA Procedure provided to IMG for review. Additional comments have been provided.	Level II Immediate corrective action now required to prevent risk of impact to resources or

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
		the construction and maintenance of roads.	SSA.			receptors.
Dec 2015 Rev1-PS3-3	<i>Measurable HSE Components</i>	A revised draft SSA Procedure and site specific EMP procedures were provided prior to the third IMG review. A review of the draft Procedure indicates that further work is required.	The SSA Procedure should include: description of the planned activities, a scoping process to identify the environmental and social elements to be assessed, relevant baseline information, and impact assessment methodology. The outcomes should link with the EHS-MP (see Rev1-PS3-1)	Operator EHS Team Revised SSA Procedure to be finalised by the end of Q1 2017.	In Progress Draft SSA Procedure provided to IMG for review. Additional comments have been provided.	Level II Immediate corrective action now required to prevent risk of impact to resources or receptors.
Dec 2015 Rev1-PS3-4	<i>Sediment Erosion Control</i>	The first IMG review recommended that a sediment and erosion control plan be developed for specific project activities and linked to the SSA procedures.	Company will develop a sediment and erosion control procedure. SSA to refer to sediment and erosion control procedure and require development of sediment and erosion control plan where these are identified through the SSA Procedure as being necessary.	Operator EHS Team Revised SSA Procedure is to be finalised by the first quarter of 2017	In Progress Revised SSA Procedure provided to IMG for review. Additional comments have been provided.	Level II Immediate corrective action now required to prevent risk of impact to resources or receptors.
Jun 2016 Rev2-PS3-4		The Operator has provided final <i>Line Clearance and Restoration Guidelines</i> (T-KE-EHS-GUD-0003) Rev02 that provides guidance on management of soil erosion from line clearance activities.	The existing sediment and erosion control methods within the <i>Line Clearance and Restoration Guidelines</i> (T-KE-EHS-GUD-0003) should be updated to address the provision of specific training for field staff on the application of the Guidelines to prevent soil erosion to restore disturbed land surfaces.	Operator EHS Team Revised SSA Procedure is to be finalised by the first quarter of 2017	In Progress Revised SSA Procedure provided to IMG for review. Additional comments have been provided.	Level II Immediate corrective action now required to prevent risk of impact to resources or receptors.
Dec 2015 Rev1-PS3-5	<i>Greenhouse Gas Emissions</i>		A procedure for the collation and reporting of greenhouse gas emissions should be prepared.		Closed Addressed through Procedure (T-KE-ESP-PRO-0004) and (T-ESP-PRO-0001).	Recommendation
Performance Standard 4 Community Health, Safety, and Security						
Dec 2015 Rev1-PS4-1	<i>Emergency Response Plan</i>	The existing <i>Emergency Response Plan</i> needs to be updated to include	The Awareness and Preparedness for Emergencies at the Local Level (APELL) approach has been	Operator HSE Team supported by the Social Performance	In Progress APELL approach will be trialled over the first half of	Recommendation

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
		consideration of the community and local authorities in understanding and responding to risks and emergency events.	developed to engage with relevant communities and government bodies on the types of potential emergency situations, measures required to manage an emergency situation, and the required resources and responsibilities required to responds to emergency situations. Updates to the Emergency Response Plan should be documented, and disclosed to local communities, as well as relevant government bodies (eg, emergency services, healthcare facilities and police).	Team-Requirement for community engagement The APELL should be finalised and operationalised in Q3 2017 once the trail period has been concluded.	2017 to determine its effectiveness and suitability. Community communication leaflets have been produced to support the APELL process.	
		In the first IMG review a gap was identified in the documentation of health profiles of the potentially affected communities to understand community exposure and risk to disease, including the potential impact of project activities on local communities such as workforce interaction with communities.	A health profile for the affected communities should be developed to understand potential health risks and impacts to the community and local Project workforce.	Community Health profiles to be addressed in South Lokichar Development Project Phase 1 ESIA due to report in Q3 2018.	In Progress ESIA Terms of Reference for health baseline data gathering to be provided for IMG review prior to completion of the ESIA studies.	Recommendation
Performance Standard 5 Land Acquisition and Involuntary Resettlement						
Dec 2015 Rev1-PS5-1	<i>Free Prior and Informed Consent for Land Access</i>	A gap was identified within the existing Land Access Procedure and Stakeholder Engagement Framework for the South Lokichar Development Project regarding documentation of Free, Prior and Informed	Formalise the FPIC process and incorporate this into the existing Land Access Procedure, as well as the Land Access Framework for the development phase. This should clearly outline the objectives and activities required to achieve FPIC.		Closed Undergoing Operator and IFC review. Now covered under Rev-1 PS7-1	Recommendation

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
		Consent (FPIC).	Implementation of the FPIC process should be documented and provide evidence of the agreement between the two parties on the outcome of the negotiation.			
Performance Standard 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources						
Dec 2015 Rev1-PS6-1	<i>Baseline Biodiversity and Habitat Assessment</i>	To assist with compliance with IFC PS6 standards, it was identified by the IMG in the previous reviews that certain requirements would need to be included within the full-field development ESIA.	<p>A comprehensive baseline assessment is required to define the biodiversity values that are likely to be present within the AOI and specifically the Development Project area. The baseline assessment should focus on species of conservation significance and their habitats.</p> <p>A spatial assessment of the distribution of Natural and Modified Habitats within the AOI and Development Project area is required. This assessment should define and justify the criteria used to spatially define the extent of natural and modified habitats.</p> <p>Using the updated baseline assessment and the definition of natural and modified habitats, critical habitat triggers should be screened and assessed for the AOI and Development Project area.</p>	<p>Operator HSE Team</p> <p>The Natural/Modified Habitat mapping is to be completed by the end of Q1 2017.</p> <p>The full field ESIA for the South Lokichar Block will be completed by Q3 2018.</p>	<p>In Progress</p> <p>To be addressed in the South Lokichar Development Project Phase 1 ESIA.</p> <p>The IMG understands that further assessments are currently being undertaken to benchmark the condition of vegetation types within the landscape and to apply appropriate metrics to determine the current status of the habitat types. Remote sensing will be used to spatially delineate the boundaries of the habitat types within both exploration blocks.</p>	Level I Action required to address this issue to avoid future risks
Dec 2015 Rev1-PS6-2	<i>Ecosystem Services Screening</i>	A specific assessment of Ecosystem Services is required to define the provisioning, regulating and cultural ecosystem services relied on by people within the AOI.	In conjunction with the social assessment being undertaken as part of the Development ESIA process, screening of ecosystem services relevant to the	<p>Operator HSE Team</p> <p>To be addressed in the South Lokichar Development Project Phase 1</p>	<p>In Progress</p> <p>To be included in the TORs for the South Lokichar Development Project Phase 1 ESIA</p>	Recommendation

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
			Development Project area should be undertaken. Where necessary, additional baseline data should be collected. The results of the assessment are to be incorporated into the full-field ESIA.	ESIA due to report by Q3 2018.		
Dec 2015 Rev1-PS6-3	<i>Conservation Significance Mitigation</i>	Baseline data on species of conservation significance within the AOI is required to inform the Critical Habitat assessment. Sufficient spatial definition within the Development Project area is required to define whether project activities would impact on Critical Habitats.	Based on the spatial definition of natural, modified and critical habitats and data in relation to the distribution and utilisation of species of conservation significance within the AOI, the mitigation hierarchy should be applied to the likely Development Project area. Specific mitigation measures should be developed to limit impacts on species of conservation significance and their habitats and incorporated into the EHS MPs. Residual impacts on biodiversity values and ecosystem services should be measured using an appropriate metric to demonstrate compliance with no-net-loss or net gain goals. If required, biodiversity offsets can be considered to assist in achieving the goals. Consultation with relevant stakeholders such as government agencies and NGOs should be undertaken as required.	Operator HSE Team To be addressed in the South Lokichar Development Project Phase 1 ESIA due to report by Q3 2018.	In Progress To be included in the TORs for the South Lokichar Development Project Phase 1 ESIA	Recommendation
Dec 2015 Rev1-PS6-4	<i>Biodiversity Action Plan</i>	The IMG noted during the first IMG review that several elements of IFC PS6 were being assessed through the current ESIA for Phase 1 of the	If Critical Habitat is identified and impacted by the project, a Biodiversity Action Plan must be prepared in relation to the management of any critical habitats	Operator HSE Team To be addressed in the South Lokichar Development	In Progress	Recommendation

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
		South Lokichar Development Project.	by the Operator.	Project Phase 1 ESIA due to report by Q3 2018.		
Dec 2015 Rev1-PS6-5	<i>Invasive Species Management</i>	The existing invasive species management list is contained in the broader Kenyan Biodiversity Management Plan.	An Invasive Species Management Procedure should be produced to relate to site-specific requirements and incorporated into site specific EHS MPs.	Operator HSE Team By the end of Q1 2017.	In Progress Draft procedure issued to IMG for review. The IMG has provided specific comments on the draft procedure.	Level I Action required to address this issue to avoid future risks
Jun 2016 Rev2-PS6-11		During the second IMG review land was observed within Block 12A to contain infestations of the species, <i>Lantana camara</i> , which is listed as an invasive species in Kenya ⁽¹⁾ . It is a requirement of IFC PS6 that the risk of introducing invasive species be assessed and managed, where appropriate, to reduce risks of further transmission and proliferation due to project related activities.	The assessment of exploration activities in Block 12A using the SSA procedure are to specifically address the transmission and management of invasive species. The draft Invasive Species Management Procedure should be updated and operationalised.	Operator EHS Team The SSA and required mitigation to be completed prior to the commencement of further exploration activities in South Lokichar and Block 12A.	In Progress Revised SSA Procedure and draft guidelines for invasive species were provided to the IMG for review and specific comments have been provided on these documents by the IMG.	Level II Immediate corrective action now required to prevent risk of impact to resources or receptors.
Dec 2015 Rev1-PS6-6	<i>Decommissioning and Restoration</i>	Mitigation measures for the restoration of disturbed areas have been developed and are currently being implemented as part of the ESMP. These protocols include measures to reshape the land surface and seed/replant native	The Decommissioning and Restoration Guidance and Reinstatement and Restoration Plan should be updated to incorporate best practice techniques for restoration, relevant success criteria, monitoring protocols, and	Operator EHS Team End of Q4 2017.	In Progress	Level I Action required to address this issue to avoid future risks

¹ GISD (2006). Global Invasive Species Database online data sheet. *Lantana camara* (shrub). www.issg.org/database.

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
		vegetation.	mechanisms for continual improvement and contingency.			
Dec 2015 Rev1-PS6-7	<i>Supply Chain Sustainability Assessment</i>	The IMG noted during the first IMG review that several elements of IFC PS6 were being assessed through the current ESIA for Phase 1 of the South Lokichar Development Project.	An assessment of the supply chain to determine the sustainability of Natural Resources supplied should be undertaken and outlined in the full field ESIA.	Operator EHS Team To be addressed in the South Lokichar Development Project Phase 1 ESIA due to report by Q3 2018.	In Progress Being undertaken as part of the FFD ESIA	Recommendation
Dec 2015 Rev1-PS6-8	<i>Monitoring and Evaluation Criteria</i>	The IMG noted during the first IMG review that several elements of IFC PS6 were being assessed through the current ESIA for Phase 1 of the South Lokichar Development Project.	Monitoring and evaluation criteria should be defined and incorporated into the EHS MS; site specific plans, BMP (if required) and relevant revised restoration plans. The results of the assessment are to be incorporated into the full-field ESIA.	Operator EHS Team To be addressed in the South Lokichar Development Project Phase 1 ESIA due to report by Q3 2018.	In Progress Being undertaken as part of the FFD ESIA	Recommendation
Jun 2016 Rev2-PS6-9	<i>Compliance with IFC Performance Standards in Exploration Blocks</i>	During the second IMG review, it was observed in the field and through review of documentation that there may be gaps in the application of IFC Performance Standard 6 for exploration activities in licence blocks where the block-wide ESIA has not fully addressed biodiversity issues. During the third IMG site visit, the IMG was informed that SSA Procedures will be applied to determine compliance with IFC PS6, including defining impacts to Natural Habitat and Modified Habitat.	For new Site Specific Assessments (SSA) and ESIA's undertaken for activities such as exploration drilling and/or full field developments within the existing licence blocks, a spatial assessment of Natural Habitat and Modified Habitat within the relevant project areas should be undertaken. Application of the SSA procedure in exploration blocks should occur prior to commencement of activities in Block 12A and South Lokichar blocks which may be as early March/April 2017.	Operator EHS Team The Natural/Modified Habitat mapping is to be completed by the end of Q1 2017.	In Progress Progress on the spatial assessment of Natural Habitat and Modified Habitat within the relevant project areas was discussed at the third IMG review site visit and approach agreed.	Level I Action required to address this issue to avoid future risks

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
Jun 2016 Rev2-PS6-10	<i>Restoration Activities</i>	<p>There were a limited number of sites that had been rehabilitated to date but as the development project progresses there would be a requirement to have a more detailed procedure for site rehabilitation to reduce net loss of habitats and grazing areas.</p> <p>The final Line Clearance and Restoration Guidelines T-KE-EHS-GUD-0003 REV02 have been produced.</p> <p>Trial nursery facilities had been established at two locations in the South Lokichar blocks and local indigenous plants had been propagated.</p>	<p>Site restoration pilot schemes are to be progressed with technical assistance to investigate methods to improve and monitor site restoration in South Lokichar and Block 12A.</p> <p>Adequate field implementation is required to ensure that staff are trained and are knowledgeable of the contents of the Guidelines.</p>	<p>Operator EHS Team</p> <p>Planting trials commence by the Q2 2017</p> <p>Note this as of 31 March 2017 AOC no longer has an interest in Block 12A,</p>	<p>In Progress</p> <p>Progress was observed during the third IMG review in the establishment of site restoration activities in South Lokichar.</p>	Recommendation
Performance Standard 7 Indigenous People						
Dec 2015 Rev1-PS7-1	<i>Free Prior and Informed Consent for Land Access</i>	<p>A gap was identified within the existing Land Access Procedure and Stakeholder Engagement Plan for the South Lokichar Development Project regarding documentation of Free, Prior and Informed Consent (FPIC).</p>	<p>It is recommended that the Operator formalise requirements to undertake FPIC through the revision of the Land Access Procedure for the development project to reflect FPIC requirements. The implementation of FPIC should ensure that the following is achieved and documented.</p> <ul style="list-style-type: none"> Engagement and negotiation processes, including documentation of key milestones, agreements and feedback from the affected community. Details of the community 	<p>Operator SP Team</p> <p>Existing Land Access Procedure (dated 20/05/2016) to be finalised reflecting any feedback on LAF.</p> <p>Approved SEP by end of Q1 2017</p> <p>Approved LAF by end of Q4 2017</p>	<p>In Progress</p> <p>Final versions of these documents to be reviewed by IMG following consultation with the Government of Kenya and Turkana County Government to finalise these documents.</p>	Recommendation

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
			<p>members involved in the FPIC process.</p> <ul style="list-style-type: none"> The affected communities are fully informed of the land access process, and objectives of FPIC. 			
Performance Standard 8 Cultural Heritage						
Dec 2015 Rev1-PS8-1	<i>Cultural Heritage Training</i>	<p>During the first IMG visit, it was observed that contractors and Operator staff were not aware of the requirements to manage cultural heritage during SSA assessments.</p> <p>Contractors working on site need to be aware of the requirements of the Cultural Heritage Management Plan and be trained in Chance Finds procedures.</p>	<p>Maintain relevant training requirements for field staff that will be responsible for the management of impacts to cultural heritage resources. This will involve working with the necessary teams in the field to ensure that cultural heritage management measures are in place, and implemented when necessary.</p> <p>The company will ensure that SSA procedure includes reference to the Cultural Heritage Procedure.</p> <p>Company will ensure that cultural heritage procedures are included in contractor requirements.</p> <p>Company will ensure periodic training on cultural heritage procedure and especially chance find protocol to contractors engaged in activities involving disturbance of land surface, including road developments.</p>	Operator EHS Team The SSA Procedure is to be finalised by the first quarter of 2017	In Progress Revised SSA procedure undergoing development and review to include training needs and representation from NMK and/or TBI as required.	Level II Immediate corrective action now required to prevent risk of impact to resources or receptors.
Jan 2017 Rev3-PS8-1	<i>Relocation/ Management of Cultural Sites</i>	At a newly opened well site, community members reported the presence of a grave (not previously identified in the SSA or Community	The Operator should develop a procedure, within the existing Cultural Heritage Management Procedure, to manage the relocation or impacts to locally important	TKBV SP team End of Q1 2017	Open Procedure to be reviewed during next IMG review.	Level I Action required to address this issue to avoid future risks

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing	Status/Comment	IMG Rating
		Agreement). The grave site was demarcated in consultation with affected people and activities in the well site arranged to avoid the location of the grave. A grievance was registered by two community members for potential disturbance to a grave site and was closed out following a 'cleansing ceremony'. The Operator does not have a procedure in place to manage traditional requirements related to the relocation/ disturbance of graves or other locally important sacred sites.	cultural heritages sites such as graves. The procedure should take into account any traditional cultural practices required to appease ancestor's spirit or alterations to sense of place. The procedure should outline levels of compensation and support the Operator will provide to undertake traditional ceremonies etc in order to ensure fair and transparent treatment of affected people.			

Key: grey shaded rows are closed items and blue shaded rows are new items.

6 CONCLUSIONS

6.1 ESAP REQUIREMENTS

This review presents an assessment of AOC progress with ESAP/ ESRS requirements identifying those actions that have been completed, are in progress and are pending commencement of activities. A number of draft AOC ESG Framework documents have been reviewed by the IFC. These will be finalised by the next IMG review and specific plans and procedures produced prior to operations commencing in Block 9 or the Rift Basin Area Block. The ESAP/ESRS requirements relevant to the current and planned Tullow operations in South Lokichar are mainly closed, with some pending minor revisions to draft documents or completion of current ESIAs. For future JV-led activities in Block 12A additional site-specific plans and procedures may be required to address relevant ESAP and ESRS requirements. These will be identified through the Operator's Site Specific Assessment Procedure.

6.2 IFC PERFORMANCE STANDARDS REQUIREMENTS

The Operator is continuing to actively manage the key risks and potential impacts identified through previous ESIAs, current ESIAs and direct experiences during the exploration and appraisal phases. Overall the Operator's current activities are determined to meet the requirements of the IFC Performance Standards. There is however the requirement to finalise, approve and fully operationalise a number of important management systems, plans, procedures and guidance to ensure effective identification and management of environmental and social risks. This is of particular importance in preparation for increase operational activities associated with EOPS, further planned exploration and for progress with FFD, when there will be multiple activities occurring at the same time and larger numbers of contractors and workers on the operations sites.

6.3 RECOMMENDATIONS FOR NEXT REVIEW

There are no AOC-operated activities planned in Kenya and Ethiopia over the next review period. The draft ESG Framework documents and any procedures that are developed for operations planned for later in 2017 will be reviewed within the next review period along with an assessment of progress against relevant AOC ESAP and ESRS requirements.

The focus of the next review is again likely to be on the South Lokichar Basin exploration and appraisal operations as well as the developing EOPS ESIA and the Full Field Development ESIA. A key element of this will be reviewing progress in finalising relevant systems, plans, procedures and guidance and embedding these as controlled EHS management documents.

Annex A

IMG Review Schedule

23-27 January 2017

IMG REVIEW VISIT PROGRAMME

Monday 23rd January 2017		
TIME	ACTIVITY	REMARKS/ACTION
0830	Update Briefing by AOC on progress with ESAP/ESRS/IMR requirements- AOC current status and future plans	<ul style="list-style-type: none"> • Linda Were • Mark Dingley
1100 2hrs	Update briefing by Tullow <ul style="list-style-type: none"> • Overall company update • E&A status update • EOPS status update • Pipeline status update • ESIA Updates - EOPS/FFD/ pipeline 	<ul style="list-style-type: none"> • Martin Mbogo • Frederic Briens • Paul Mowatt
1400 3hrs	Technical updates <ul style="list-style-type: none"> • Compliance Tracking and follow-up from previous audit • Stakeholder Engagement • Land Access • Site Specific Assessment (SSA) • Biodiversity 	<ul style="list-style-type: none"> • Daniel Ogol • Rob Gerrits/Daniel Ogol/ Andy Booth • Susan Muchiri • Kenneth Kamau • Paul Mowatt

Tuesday 24th January 2017.		
TIME	ACTIVITY	REMARKS/ACTION
0700 1hr 15min (approx)	Flight to Kapese Camp	
0900 1hr 30min	Arrive Kapese Camp <ul style="list-style-type: none"> • Site induction, HSE briefing, medical inspection • Check-in to accommodation 	
1030 1hr	Briefing/Update on field activities <ul style="list-style-type: none"> • SSA/ESMPs in practice • SP activities 	<ul style="list-style-type: none"> • Gordon Scott • Rob Gerrits
1230hrs 4hrs	Site visit to Ngamia and Nakukulas - EWT, EOPS production well pads, water injection, Nakukulas office, nursery and demonstration farm	

IMG REVIEW VISIT PROGRAMME

Wednesday 25th January 2017		
TIME	ACTIVITY	REMARK/ACTION
0700 45 min	Fly to Eldoret	
0800 1hr 45min	Travel from Eldoret Airport to Cheptuket	
1000 3hrs	Visit the restored Cheptuket well pad at Chepsigot Location and seismic restoration activities at Epke Location	
1400 1hr 45min	Depart for Eldoret Airport	
1600 45min	Fly from Eldoret Airport to Nairobi	

Thursday, 26 th January 2017		
TIME	ACTIVITY	REMARK/ACTION
0900 -1700	IMG Follow-Up Meetings to close-out issues and compilation of draft audit report <ul style="list-style-type: none"> • EOPS contractor management • EOPS ESIA • FFD ESA • Others as required 	<ul style="list-style-type: none"> • Tullow offices

Friday 27 th January 2017		
TIME	ACTIVITY	REMARK/ACTION
0900 -1130	IMG report-back to AOC/TKBV/Maersk <ul style="list-style-type: none"> • Key findings (compliance issues, observations, recommendations) 	

The site visit was also attended by the following people.

- Alex Mayhook-Walker, Andrew Britten, Donald Mahaga and Linda Were representing AOC.
- Rob Gerrits, Gordon Scott, Andy Booth, Daniel Ogol and Ken Kamau representing Tullow Kenya.
- Sebastian von Leuders representing Maersk Oil and Gas
- Steve Torode representing Delonex Energy

Annex B

List of Additional
Documents Provided by
AOC and Tullow Kenya
Relevant to current
Activities

TOPIC	DOCUMENT
AOC ESG Framework documents	Environmental and Social Governance Framework AOC/CRP/ESG/FRM/2016/012/V1
	Security Framework for Africa Oil Operations AOC-CRP-HSE-FRM-16-002-V1
	Cultural Heritage Management Framework for Africa oil Operations AOC-CR-ESG-FRM-16-003-V1
	Biodiversity Guidance for Prevention and Management AOC-CRP-HSE-FRM-16-004
	Grievance Mechanism Framework for Africa Oil Operations AOC-CR-ESG-FRM-16-005-V1
	Human Resources Framework for Africa Oil Operations AOC-CRP-ESG-FRM-16-006-V1
	Stakeholder Engagement Framework for Africa Oil Operations AOC-CRP-ESG-FRM-16-007-V1
	Land Access/Acquisition Framework for Africa Oil Operations AOC-CRP-ESG-FRM-16-008-V1
	Incident Reporting and Investigation AOC-CRP-HSE-PRO-13-011-V2
	Management of Change Process AOC-CRP-HSE-PRO-13-013-V2
TKBV General EHS	ESMP Audit Form T-KE-HSS-STF-0110
	KLT Inspection Checklist Template T-KE-HSS-STF-0100
	Tiered EHSS Assurance Plan T-KE-EHS-PLN-0033
	Environmental & Waste Management Audit Form Tier1 T-KE-EHS-STF-0072
	EHS Bridging Document TKBV TAI Enterprises Limited T-KE-HSS-BRD-0055- SPE-0001
	Site Specific Assessment Procedure T-KE-ESP-PRO-0003 Rev 2
	Block 13T Erut-A Drilling SSA Baseline Assessment Report
	Civils Technical specifications for exploration and appraisal operations T-KE-OPS
	ESMP for Water Injection 01 09 16_Final
	Kapese IOB ESMMP 2016 02 06 16
	Line Clearance and Restoration Guidelines-Rev 2 T-KE-EHS-GUD-0003
	Draft Well Pad Revegetation for Restoration Plan
	Draft Invasive Species Management Procedure
	EOPS Risk Register
	EOPS traffic Position Paper
	Cultural Heritage Standard T-EHS-STD-0004
	Draft cultural Heritage Management Procedure T-KE-EHS-PRO-0024
	Tullow Fossil Avoidance Procedure Rev 4
Tullow training by NMK	

TOPIC	DOCUMENT
TKBV Water Supply	Strategic water supply Technical Reports
TKBV Stakeholder Engagement	Tullow community policing booklet A6
	Taking your safety seriously-English and Swahili Versions
	Early Oil Pilot Scheme (EOPS) Engagement Strategy
	Early Oil Pilot Scheme (EOPS) ESIA Background Information Document
	Minutes of Lokichar APELL meeting held on 14/12/2016 at Lokichar sale yard baraza ground.
TKBV Community Safety, Security & Human Rights	Awareness and Preparedness for Emergencies at the Local Level (APELL) APELL Risk Assessment Register
TLBV HR/Contracting	Draft Tullow HR Contractor Standard T-KE-HRS-GUD-0002