

# Independent Monitoring Group

## Eighth HSEC Monitoring Review

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## Acronyms and Abbreviations

Name	Description
API	American Petroleum Institute
AOC	Africa Oil Corporation
CDP	Carbon Disclosure Project
CPF	Central Processing Facility
EHS	Environment, Health and Safety
EHS MP	Environment, Health and Safety Management Plan
EOPS	Early Oil Pilot Scheme
ESAP	Environmental and Social Action Plan
ESRS	Environmental and Social Review Summary
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESG	Environmental and Social Governance
EWT	Extended Well Test
FEED	Front End Engineering Design
FFD	Full Field Development
FID	Financial Investment Decision
FPIC	Free Prior Informed Consent
GHG	Green House Gases
GIIP	Good International Industry Practice
GoK	Government of Kenya
GRI	Global Reporting Initiative
HR	Human Resources
HSEC	Health, Safety, Environment and Community
IAOGP	International Association of Oil and Gas Producers
IMS	Integrated Management System
IFC	International Finance Corporation
IMG	Independent Monitoring Group
IPIECA	International Petroleum Industry Environmental Conservation Association
KJV	Kenya Joint Venture
KPI	Key Performance Indicator
LALR	Land Acquisition and Livelihood Restoration
LARF	Land Access and Resettlement Framework
LLCOP	Lokichar to Lamu Crude Oil Pipeline
NEMA	National Environmental Management Authority
NGO	Non-Governmental Organisation
PS	Performance Standard
RAP	Resettlement Action Plan
SASB	Sustainability Standards Accounting Board
SEP	Stakeholder Engagement Plan
TCFD	Task Force on Climate Related Financial Disclosures

## EXECUTIVE SUMMARY

*Africa Oil Corporation (AOC)* is a Canada based oil and gas exploration and development company with exploration and development assets in Kenya, exploration, development and producing assets offshore Nigeria, as well as a portfolio of exploration assets in Guyana, Namibia, South Africa and in the Senegal/Guinea Bissau Joint Development Zone. AOC holds its interests through direct ownership of concessions and through its shareholdings in investee companies (Prime Oil & Gas BV, Africa Energy Corp, Eco (Atlantic) Oil & Gas Ltd and Impact Oil and Gas Ltd).

The Equity Subscription Agreement between AOC and the International Finance Corporation (IFC) for oil and gas exploration, appraisal and development activities requires AOC, and its Joint Venture partners, to conform to the IFC Performance Standards (PS) on Environmental and Social Sustainability (2012) and fulfil the requirements of an agreed Environmental and Social Action Plan.

AOC's onshore assets in the South Lokichar Basin in north-west Kenya are operated by its Joint Venture partner, Tullow Kenya. The Operator is progressing with the Full Field Development Project which is undergoing further field development planning. Currently activities on site are at a low level, mainly in response to the restrictions resulting from the Covid-19 pandemic. The Environmental and Social Impact Assessment (ESIA) for the Project is due to be finalised by the end of 2021 with a Final Investment Decision planned for 2022. An ESIA for the associated pipeline development has been submitted to the Kenyan authorities for determination. A number of findings from previous reviews regarding finalising management plans and procedures remain open pending recommencement of site activities and progress with these will be assessed in subsequent reviews.

AOC has revised its Corporate Environmental and Social Management Framework, and associated corporate Policies and Standards of Operation, to be applicable to potential future operational roles, and to provide oversight of its current and potential future interests in non-operator roles within its broader portfolio of assets. At a corporate level, these new policies and standards are aligned with the requirements of the IFC Performance Standards (PSs) with respect to establishing systems to identify and manage risks. For non-operated assets, the level of influence that AOC has over conformance with the IFC PSs, and to obtain reportable information to demonstrate this conformance, varies depending on the nature of the investment. For JV arrangements, such as with Tullow Kenya, or where AOC has a position on the Board of Directors of the company invested in then level of influence is higher than where AOC only has an invested interest. The level of risk also varies with location, the nature and stage of the assets, and with the capacity and experience of the Operator.

Recommendations are made on strengthening the new ESG Due Diligence Procedure to further address this risk and for the new Performance Monitoring Standard of Operation to focus on obtaining the required information from non-operated assets to demonstrate conformance with the FC PSs.

AOC are at an early stage in external reporting and is planning an ESG performance section in its next quarterly report, scheduled for early 2021. The approach developed to report conformance with IFC PSs for the non-operated assets, along with progress with the South Lokichar Project, will be assessed at the next IMG review. This is currently scheduled for the second quarter of 2021.

## 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. The agreement included a requirement for AOC to conform to the IFC Performance Standards (PS) on Environmental and Social Sustainability (the Performance Standards) and to undertake specific actions detailed in an agreed Environmental and Social Action Plan (ESAP). The ESAP was developed by the IFC based on its Environmental and Social Review Summary (ESRS) of AOC's activities produced in June 2015.

*Environmental Resources Management Consulting East Africa Limited (ERM)* was commissioned by AOC and the IFC to act as the Independent Monitoring Group (IMG) <sup>(1)</sup>. 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 with respect to IFC's environmental and social requirements.

Reviews were scheduled every six months during exploration and development phases, and annually during production phases. The first seven IMG reviews were undertaken in:

- December 2015 (including site visit to South Lokichar and Block 12A);
- July 2016 (including site visit to South Lokichar and Block 12A);
- January 2017 (including site visit to South Lokichar);
- July 2017 (desk based due to travel restrictions associated with elections in Kenya);
- May 2018 (including site visit to South Lokichar);
- December 2019 (delayed due to reduced levels of activity on site and included site visit to Early Oil Pilot Scheme and oil transport); and
- February/March 2020 (including site visit to South Lokichar and desk based reviews of upstream Phase 1 development and midstream pipeline project Environmental and Social Impact Assessments).

This report covers the findings of the eighth review undertaken in November/December 2020. The review was desk based due to travel restrictions and a low level of site activity at South Lokichar due to the Covid-19 pandemic.

### 1.2 Scope of the Review

Previous reviews have focussed on AOC's interests in Kenya and, to a lesser extent, Ethiopia. AOC's current interests in East Africa are the non-operated assets (Blocks 13T, 10BA and 10BB in the South Lokichar Basin, north-west Kenya) operated by a JV partner, Tullow Kenya. AOC currently have no other non-operated or operated interests in Kenya and Ethiopia as AOC and JV Partners have relinquished its interests in Block 12A (2017) and Block 9 (2018) in Kenya and the Ethiopian interests (2019), as reported in previous reviews. The current review provides an update on the previous reviews that were focussed of the South Lokichar development activities.

From late 2018, AOC has broadened its investment portfolio and now has interests across the oil and gas exploration, development and production cycle, including non-operated assets in Nigeria, Namibia, South Africa, Senegal/Guinea Bissau Joint Development Zone and Guyana (as described in Chapter 2). The current review has therefore been expanded to also include an assessment of AOC's recently updated Environmental and Social Governance (ESG) systems, policies, standards of operation and performance reporting requirements that apply to these and potential future non-operated assets as well as to assets where AOC may have an operator role.

(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).

## 1.3 Objectives

The overall objective of the IMG review is to identify areas of non-conformance <sup>(1)</sup> within the review framework and to make recommendations for corrective actions, or improvements in line with Good International Industry Practice (GIIP).

The current review covers the following areas.

- Progress against the current AOC ESAP requirements.
- Progress with operational-level HSEC management plans, procedures and operational performance at the South Lokichar Development Project.
- Overview of AOC's other non-operated interests.
- Review of AOC revised Environmental and Social Governance (ESG) systems, policies and standards of operations relating to the control and oversight of environmental and social risks and issues.

## 1.4 Approach

The approach taken for the current review was as follows.

- Attend an inception meeting to receive a briefing on AOC current and planned activities.
- Conduct a desktop review of AOC's and JV partners new, revised or finalised ESG policies, plans and procedures; stakeholder engagement plans; land access plans; and associated studies and reports. This included the revised Draft South Lokichar Foundation Phase ESIA.
- Request clarifications or further information from AOC and report the review findings.

It is noted that no site visits were possible due to travel restrictions and low level of site work at South Lokichar associated with the Covid-19 pandemic.

Each IMG report provides updated information on assets and project progress as well as an update on previous observations/findings and any new observations/findings. Where appropriate, information in the previous IMG reviews is referenced or summarised to avoid unnecessary repetition. The review methodology and action tracking procedure is presented in Chapter 3.

## 1.5 Review Period

This review covers the activities in progress between the seventh review in February/March 2020 and the current review in November 2020. Where reference is made in this report to the 'next review period', this would cover the approximately six-month period from December 2020 to the next review currently scheduled for the second (Q2) of 2021. Due to ongoing travel restrictions related to the Covid-19 pandemic if it not currently known if field visits will be possible or if the review date will be delayed due to related project delays.

## 1.6 IMG Review Team

The ERM IMG review team comprised four consultants, covering the following skills specified in the IMG Scope of Work, ie desk-based study with a focus on the new Environmental and Social Management Framework.

- Mark Irvine: Team Leader and Environmental Specialist.
- Reed Huppman: Sustainable Finance Specialist
- Damian Weldon: Environmental Management Systems Specialist.
- Holly Jeans: Greenhouse Gas Emission Specialist.

(1) The term 'compliance' relates to specific legal and regulatory measures or contract requirements, whereas the term 'conformance' relates to a standard that is outcome-based.



An ERM social specialist reviewed the draft South Lokichar Development Land Access Strategy and draft Land Access and Resettlement Framework as part of the seventh review in March 2020. No updates of these documents were available for this review, however, a social specialist will be part of the next review when updates of these documents and progress with the strategy are expected.

## 1.7 Limitations

The findings in this report are based on the Scope of the Review described above. ERM performed these services in a manner consistent with the normal level of care and expertise exercised by members of the environmental and social consulting profession. The work is based primarily upon documents produced and studies performed by third parties, and follow-up interviews and discussions.

ERM has used information provided by AOC, JV Partners and their representatives in good faith and with verification limited to requests for clarifications and additional documentary evidence. The assessment and recommendations made are based on professional judgement drawing on 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.

## 1.8 Report Structure

The remainder of this review report is structured as follows.

- Chapter 2 summarises the key AOC and JV assets and status of activities.
- Chapter 3 outlines the assessment framework and applicable standards.
- Chapter 4 presents an assessment of the progress against the AOC ESAP requirements
- Chapter 5 presents an update of the findings of the review of the South Lokichar Development (Foundation Phase) Project and AOC's other non-operated assets with respect to the IFC Performance Standards, along with the actions required for conformance and recommendations to meet GIIP.
- Chapter 6 presents an assessment of the revised AOC ESG system, policies and standards of operation with respect to potential operated assets and AOC's role as an investor.
- Chapter 7 presents the conclusions and recommendations for the next review.

The review is supported by the following appendix.

- *Appendix A: Additional Documents Provided by AOC for the Current Review.*

## 2. AOC AND JV ASSETS AND CURRENT ACTIVITIES

### 2.1 Overview of Non-Operated Interests

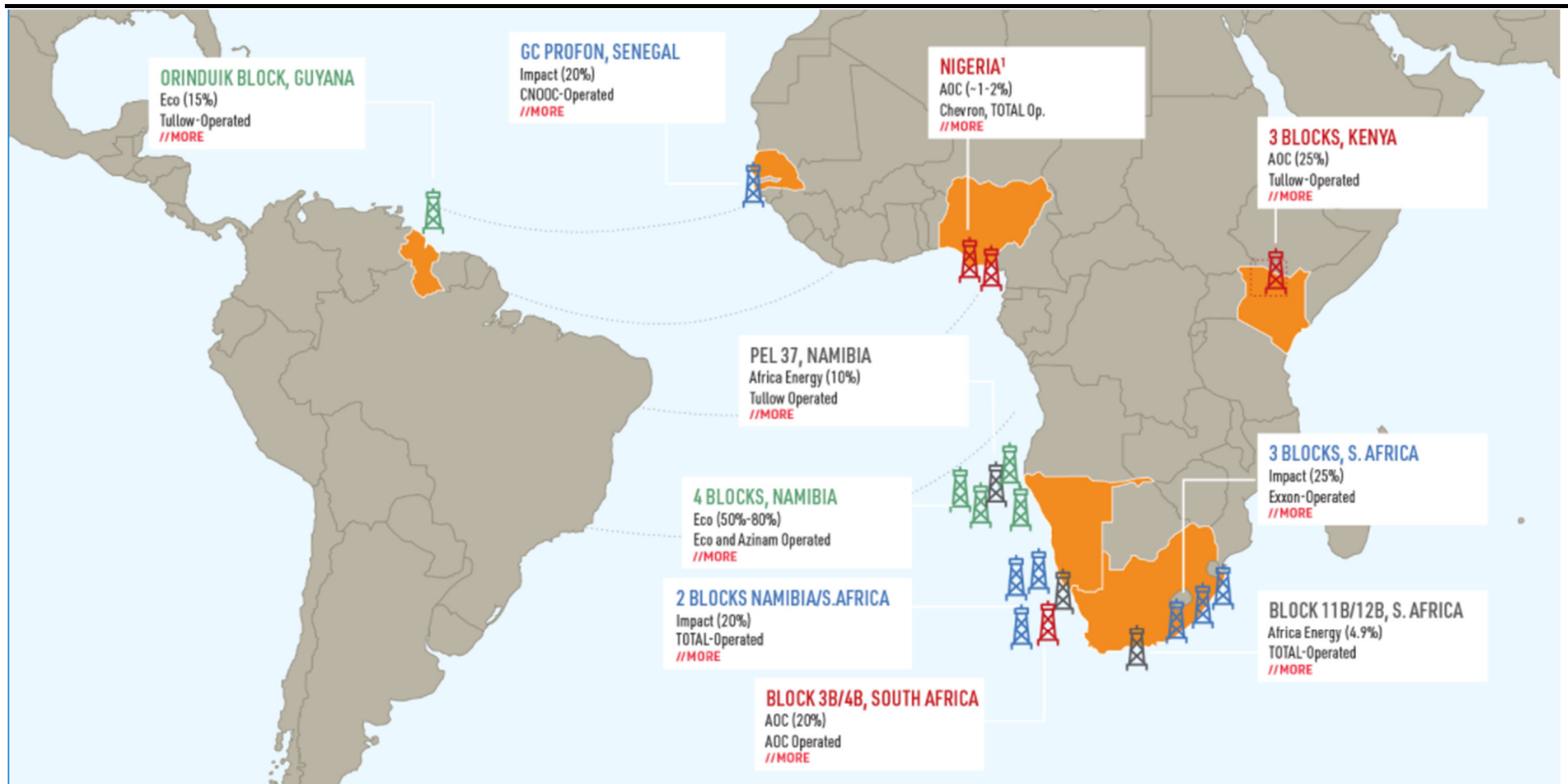
A summary of AOC's and its JV Partners interests is provided in Table 2.1 and illustrated in Figure 2.1. Further details are provided in the following sections.

**Table 2.1 AOC Non-Operated Interests**

Company and AOC Relationship	AOC Shareholding and date of entry	AOC Influence	Country	Block/Fields	Company Shareholding	Operator
Africa Oil Kenya	100%	Wholly owned	Kenya	10BA, 10BB, 13T	25%	Tullow Kenya
Africa Oil SA Corp	100%	Wholly owned	South Africa	3B/4B (Exploration Rights)	20%	Africa Oil SA
Prime Oil and Gas	50% Jan 2020	AOC has Director on Board	Nigeria	OML 127 (Agbami producing field)	8%	Chevron
				OML 130 (Akpo and Egina producing fields)	16%	Total
Africa Energy Corp	31.3% March 2015	Independent Director	South Africa	11B/12B (Exploration Rights)	4.9%	Total
				2B (Exploration Rights)	90%	Africa Energy
			Namibia	PEL 37	10%	Tullow
Impact Oil and Gas	31.1% May 2018	AOC has Non-Executive Director on Board	Namibia/ South Africa	2 blocks	20%	Total
			South Africa	3 blocks	25%	ExxonMobil
			Senegal/ Guinea Bissau	GC Profond	20%	CNOOC
Eco Atlantic	18.4% Nov 2017	Independent Director	Guyana	Orinduik Block	15%	Tullow
			Namibia	Four blocks	50-80%	Eco and Azinam

Sources: AOC website, November 202, AOC Shareholders Report October 2020

Figure 2.1 Current AOC JV Assets



Source: AOC website November 2020

## 2.2 Africa Oil Kenya

Africa Oil Kenya is wholly owned by AOC. Non-operated assets in Kenya include Blocks 10BA, 13T and 10BB in Turkana County, in north-west Kenya. The assets are operated by Tullow Kenya (50%) in a JV with AOC (25%) and Total (25%), named the KJV later in this report. The extended exploration licence for Block 10BA runs to 26 April 2021. Activities in blocks 13T and 10 BB described in Section 2.2.1 below.

It was reported in the previous review that AOC and its JV partner, Tullow Kenya, no longer have an interest in Block 12A in Kenya, having exited in 2017, which is now operated by Delonex. Delonex have been involved in the block since March 2016 and took over operatorship from Tullow Kenya in March 2018 and then Tullow Kenya exited the block in 2019. There is currently a complaint being considered by the Office of the Compliance Advisor Ombudsman (CAO) on behalf of the IFC regarding the stakeholder consultation and disclosure processes that were previously undertaken for activities in that block (including seismic surveys and exploratory drilling undertaken between 2014 and 2016 and seismic surveys in 2018). A CAO Assessment Report, documenting positions of each party was produced by the CAO in October 2020 stating that the complainant and Delonex have both expressed an interest in addressing the issues through a voluntary dialogue process convened by CAO's Dispute Resolution Function. As AOC interests in Block 12A were as non-operators from 2010 to 2017, they stated to the CAO that they could not comment on the issues that had been raised by the complainants and therefore will not be part of the voluntary dialogue process, however, AOC have stated to the IMG that any lessons learned from this process may be considered in subsequent reviews, to the extent that they are relevant to ongoing AOC and JV activities.

### 2.2.1 South Lokichar Basin Exploration, Appraisal & Development

For the purposes of this report, the South Lokichar Basin comprises Blocks 13T and 10BB. 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 an update of the current activities for the upstream project and the associated midstream component.

The permitted phase of exploration and appraisal activities within Blocks 10BB and 13T in South Lokichar commenced on 19<sup>th</sup> of September 2015 and expired on 18<sup>th</sup> September 2020. A Force Majeure was declared by the operator, Tullow Kenya, on 15 May 2020, mainly in response to the restrictions resulting from the Covid-19 pandemic and project economics. The Force Majeure was lifted on 20 August 2020 and discussions with the Government of Kenya are ongoing on the next steps in the project development. A licence extension has been granted to 31 December 2021, contingent on agreeing a work programme and budgets. The upstream team has largely been demobilised (with a care and maintenance team in place) pending the redefinition of the project.

### 2.2.2 South Lokichar Early Oil Pilot Scheme

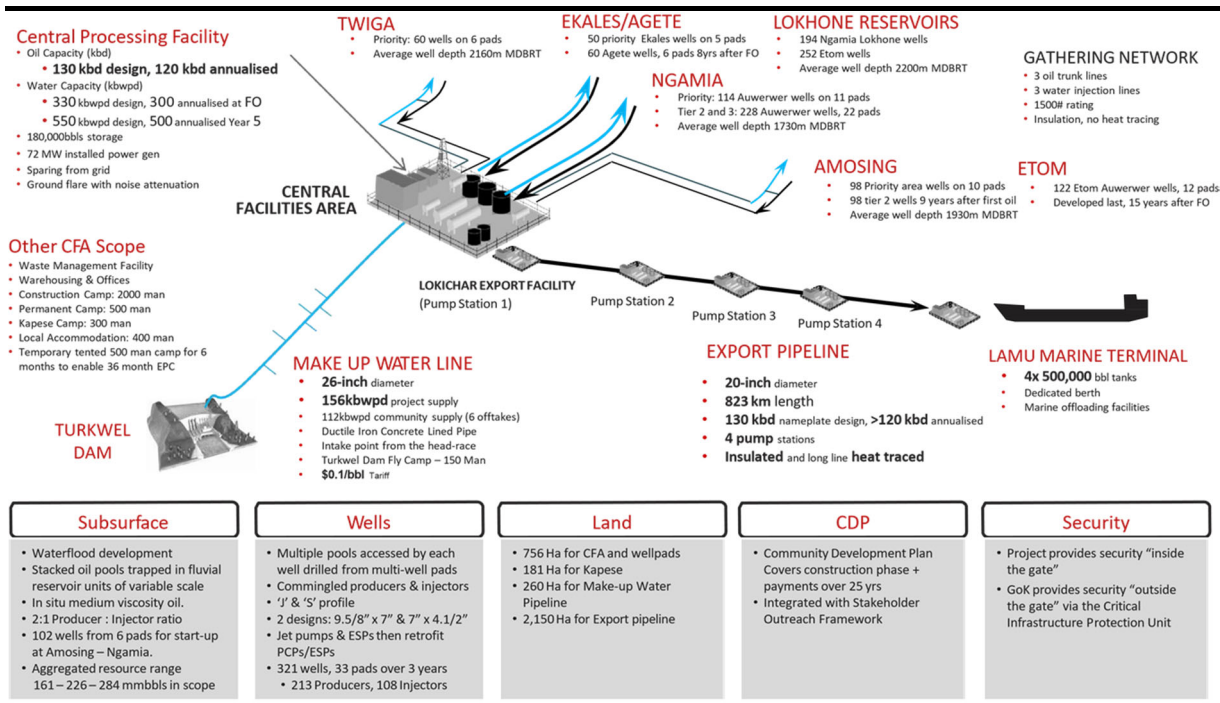
The transport by road tanker of produced crude oil from previously undertaken Extended Well Test (EWT) activities from South Lokichar to Mombasa (known as the Interim Trucking Project and part of the Early Oil Pilot Scheme) commenced in June 2019 with the first cargo of 240,000 barrels of oil being exported from Mombasa in August 2019. The project was suspended in November 2019, following a fatal road accident. The outcome of the investigation was reported in the previous IMG review, which included a series of corrective actions, however, the decision was taken in May 2020 not to recommence these activities following further delays due to flood-induced road damage in late 2019 and then the pandemic in early 2020. It was reported by AOC that the on-site storage and offloading infrastructure is being decommissioned.

### 2.2.3 South Lokichar Full Field Development Project

The field development plan for the South Lokichar Full Field Development (FFD) Project is being redefined and will now include the discoveries at Twiga, Amosing and Ngamia in block 10BB and 13T as well as additional of wells from Ekales/Agete and Etom. This will comprise a series of well pads, interconnecting flowlines, a Central Processing Facility (CPF), and support facilities and infrastructure (e.g. roads, logistics base/storage areas, waste storage sites, and power and water supply). The project redefinition process is ongoing and a revised Field Development Plan is scheduled for the end of 2021. Figure 2.1 illustrates the redefined Project schematically.

KJV is working on revised Field Development Plan that is due to be submitted to the Government of Kenya for approval by 31 December 2021. Once the project Final Investment Decision (FID) is taken, expected in 2022, then bid evaluation and contractor selection for the Project Management Company (PMC), Engineering, Procurement and Construction (EPC), Drilling, and Operations and Maintenance Services contractors can be undertaken.

**Figure 2.2 South Lokichar FFD Project and Pipeline Route: Updated Schematic**



Source: AOC Kenya update October 2020

The draft Environmental and Social Impact Assessment (ESIA), to meet Kenyan regulatory requirements, for the Foundation Phase project was disclosed on the Operator's website in June 2020 and is currently being updated to take into consideration the additional wells, well pads, land requirements and other material issues related to the Project (targeted for the fourth quarter of 2021). A supplementary lender's report focussing on IFC Performance Standards requirements is planned for 2022. The scope and scheduled completion date of that report is not yet available.

The draft upstream ESIA was reviewed by the IMG in the previous review and comments provided in Appendices to that report. A second draft ESIA has been provided to the IMG as part of the current review and the findings are updated in Chapter 5.

### 2.2.3.1 Water Supply

The Turkwel reservoir was selected as the project water source for well pressure control (water injection) following an evaluation of options (reported in previous IMG reviews). Final agreements on the water supply are pending and will be in place prior to FID.

### 2.2.4 Lokichar to Lamu Crude Oil Pipeline

The Lokichar to Lamu Crude Oil Pipeline (LLCOP) is planned to run from the CPF at South Lokichar to a marine export terminal to be built at the Port of Lamu. A Joint Development Agreement was signed between the Kenya JV (Tullow Oil Kenya, TOTAL and AOCI) and the Government of Kenya in October 2017 and a Pipeline Steering Board and Pipeline Project Management Team was established. Oversight and governance is provided by a formally mandated Pipeline Steering Board comprising representatives of the four partners that provide personnel and other resources to the project management team. AOC is therefore able to provide advice and has some influence over how activities are planned and undertaken.

An ESIA for the mid-stream component of the project was submitted to the National Environmental Management Authority (NEMA) in November 2019, with subsequent addendum issued in March 2020 to address design and pipeline route changes. The submitted midstream ESIA to meet Kenyan regulatory requirements was reviewed by the IMG in the previous review and comments provided in Appendices to that report. The LLCOP is an associated facility to the upstream development project and, as such, a supplementary assessment is planned by the end of 2021 to address gaps with respect to the IFC Performance Standards. The comments made by the IMG on the submitted midstream ESIA will be considered when the supplementary assessment is being undertaken.

The GoK LAPSSSET Corridor Development Authority, via the National Lands Commission, is leading the land access and stakeholder engagement for the pipeline, as well as the upstream land requirements. It was reported by AOC that work to survey and gazette the required land along the pipeline route was progressing well but the work required in Turkana Country was suspended due to Covid-19 access restrictions and has not yet recommenced. An updated Stakeholder Engagement Plan (SEP) for this work is planned for Q1 2021.

### 2.2.5 Summary of Activities in South Lokichar

A summary of the status and main activities underway or planned in south Lokichar described above are presented in *Table 2.2*.

**Table 2.2 Status and Current Activity in South Lokichar Basin**

Licence Block	Status	Current Activity
Blocks 13T and 10BB (South Lokichar Basin), Kenya	Exploration and appraisal licence extended to end of 2021 for blocks 13T and 10BB.	All exploration and appraisal work is currently suspended.
	The EOPS Interim Trucking Project to transport stored oil from previous well testing to Mombasa commenced was suspended in 2019.	The Interim Trucking Project has ceased and the project infrastructure is being decommissioned.
	The South Lokichar FFD Project Field Development Plan has been re-defined and a revised plan is due for completion by the end of 2021. FID is targeted for 2022 and construction is scheduled to take place over a 36 month period from FID.	Work on site has been suspended due to Covid-19 restrictions. Final ESIA for the FFD Project due for completion by end of 2021. Work on contracting the PMC, EPC and other key contractors has currently been suspended pending FID.
	Joint Development Agreement with GoK to progress export pipeline from South Lokichar to Port of Lamu.	Land access process currently suspended due to Covid-19. ESIA review by NEMA underway and feedback has not yet been provided. Supplementary Assessment to meet IFC standards is due for completion by the end of 2021.

### 2.3 Africa Oil SA Corp (South Africa)

Africa Oil SA Corp, owned by AOC, has a 20% participating interest in the Exploration Rights for Block 3B/4B, offshore South Africa became the Operator for the block in February 2020, however, this role is currently limited to the desk-based review and evaluation of previously acquired seismic survey data is being evaluated.

## 2.4 Prime Oil and Gas BV (Nigeria)

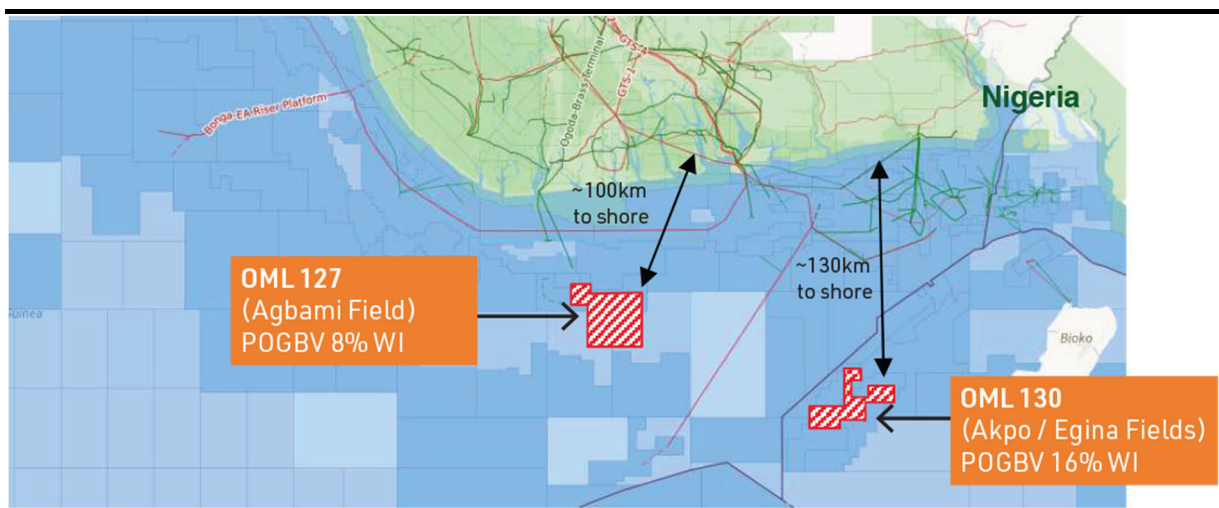
AOC holds a 50% non-operated interest in Prime Oil and Gas that has a non-operator working interests in three FPSO based deep-water producing assets offshore Nigeria. These are listed below and shown in Figure 2.3.

- Block OML 127: Agbami field operated by Chevron (AOC has approximately a 4% interest as part of Prime's approximately 8% interest).
- Block OML 130: Egina and Akpo fields operated by Total (AOC has approximately an 8% interest as part of Prime's approximately 16% interest).

## 2.5 Africa Energy Corp (South Africa & Namibia)

AOC has an approximate 31% interest in Africa Energy Corp. Africa Energy has a 4.9% interest in the Exploration Rights for Block 11B/12B, offshore South Africa, where Total is the operator. Following discoveries in 2019 (Brulpadda) and 2020 (Luiperd), further drilling and appraisal work is ongoing with the Blaasop well planned for late 2020. Africa Energy currently has a 90% participating interest in the offshore Exploration Right for Block 2B, offshore South Africa. Africa Energy also has a 10% interest in PEL 37 offshore Namibia where Tullow is the operator.

**Figure 2.3 Offshore Nigeria Assets**



Source AOC website Nov 2020

## 2.6 Impact Oil and Gas (Namibia)

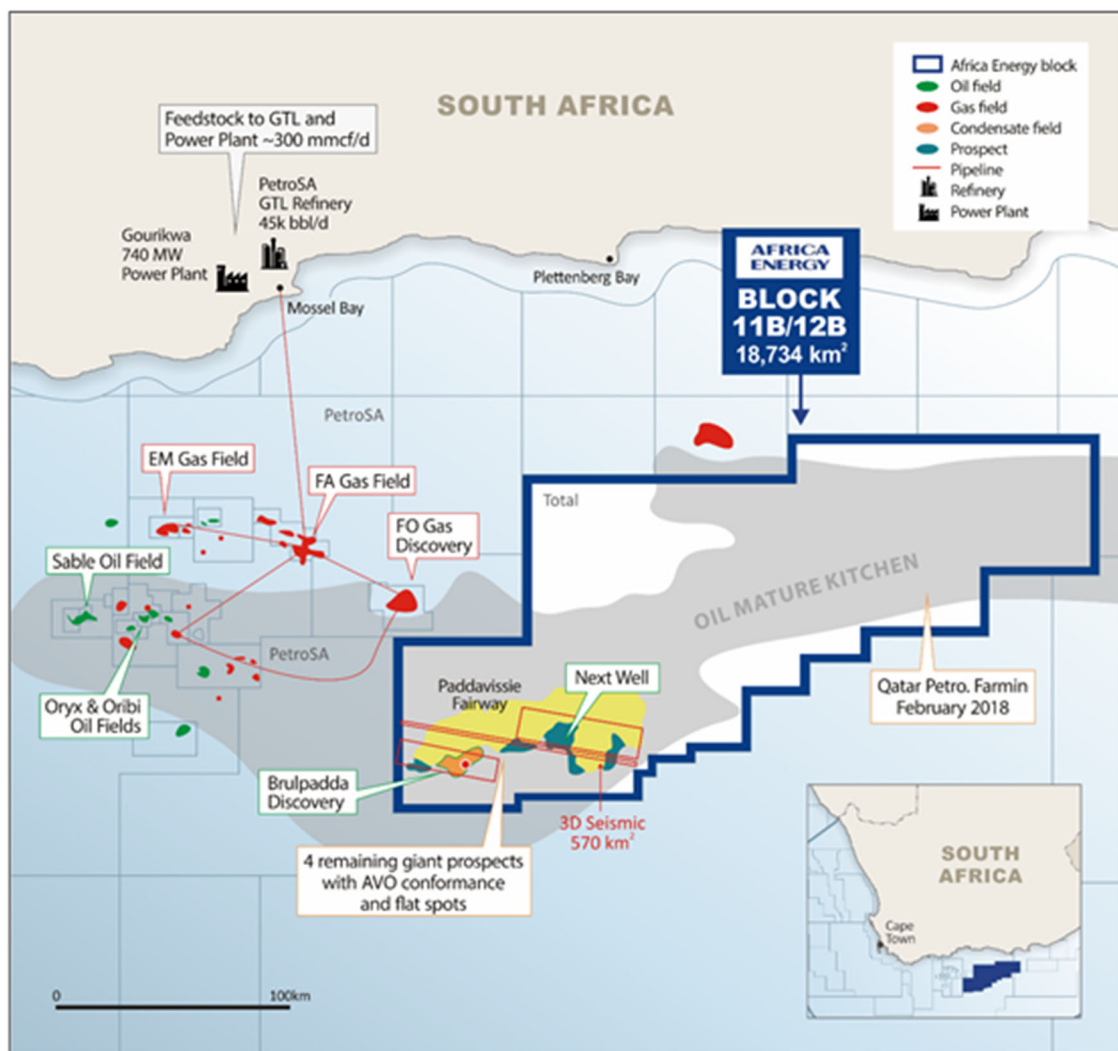
AOC has an approximately 30% interest in Impact Oil and Gas which has a 20% interest in block 2912/2913B offshore Namibia. Total is the operator and the Venus well is planned for late 2020/early 2021. Impact Oil and Gas also has interests in the CNOOC Operated AGC Profond Block in the Senegal/Guinea Bissau Joint Development Zone.

## 2.7 Eco (Atlantic) Oil and Gas Ltd (Guyana and Namibia)

AOC has an approximate 18.4% interest in Eco (Atlantic) Oil and Gas, which has a 15% interest in the Orinduik block, offshore Guyana. The operator is Tullow. Two discoveries were made in 2019 (Jethro-1 and Joe-1 wells) and the potential for further exploration and appraisal wells under current permits. Eco-Atlantic also has exploration interests in four blocks, offshore Namibia.

Figure 2.4 and Figure 2.5 provide with details of the South Africa and Namibia assets, respectively. Note figures for other assets were not available. The information and figures are from AOC's Corporate Presentation <https://www.africaoilcorp.com/investors/corporate-presentations/>.

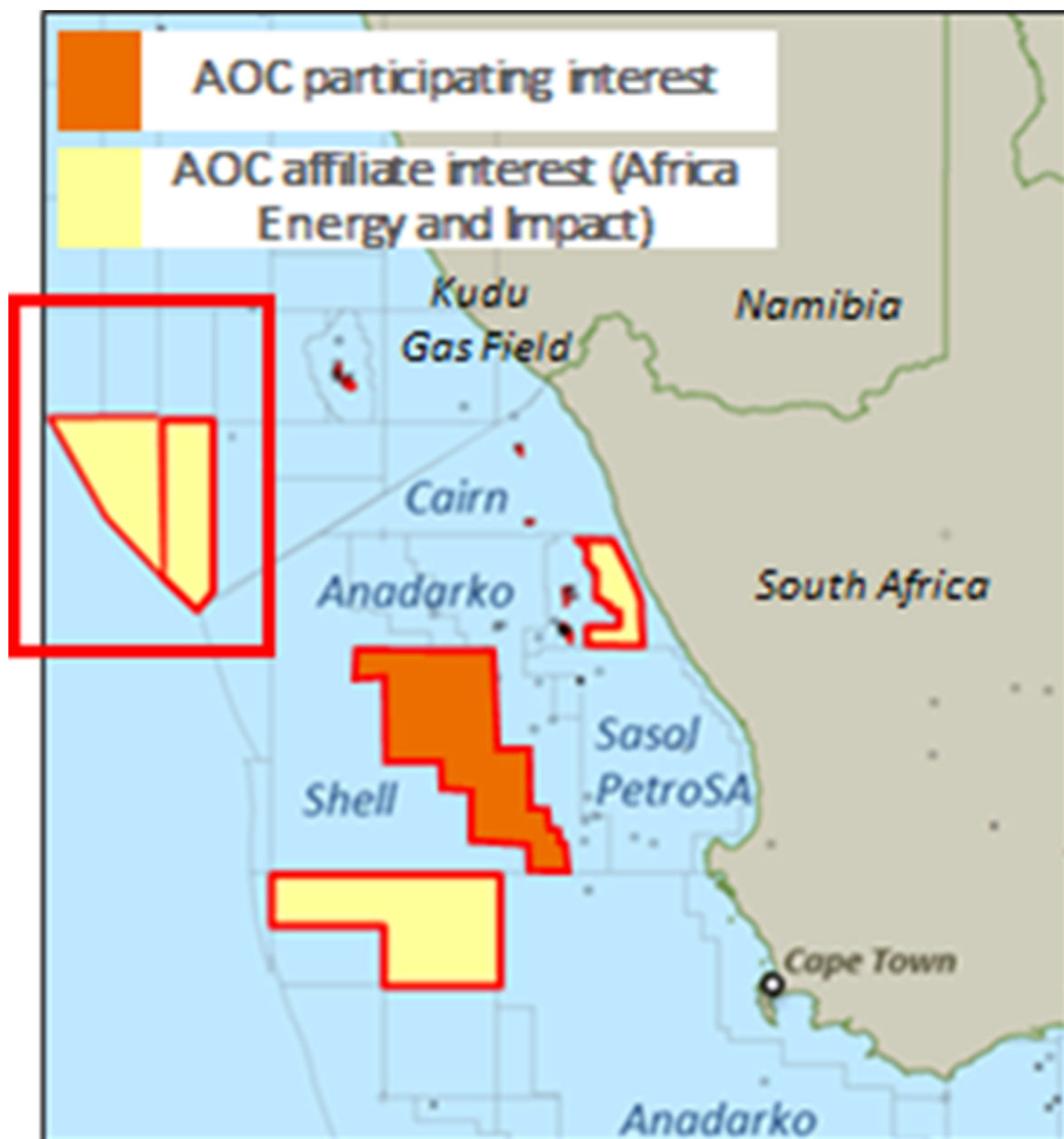
Figure 2.4 Offshore South Africa and Namibia Assets



Source: AOC Corporate Presentation May 2020. Note the oil field labelled 'next well' is now the Luiperd discovery, leaving 3 remaining prospects, and 2,900 km of 3D seismic lines have now been completed.



Figure 2.5 Offshore South Africa and Namibia Assets



Source: AOC Corporate Presentation May 2020

### 3. ASSESSMENT FRAMEWORK AND METHODOLOGY

#### 3.1 Assessment Framework

The IMG review of AOC's and its JV partners' plans and activities was undertaken through a combination of document review, corporate presentations, email exchanges and telephone conversations.

The assessment was undertaken against the following environmental and social standards.

- Relevant environmental and social laws and regulations of the host country in force at the time of the assessment.
- AOC's agreed ESAP requirements (disclosed by the IFC on 31 August 2015).
- IFC Performance Standards on Environmental and Social Sustainability (2012) and related policies and guidance, 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).
- Environmental, Health, and Safety Guidelines for Offshore Oil and Gas Development (June 2015).

The proposed pipeline along the LAPSET corridor from South Lokichar to Lamu is considered as an associated facility as it is required for the upstream project to be viable and would not be developed without the upstream project. With respect to such third party development, PS1 (paragraph 9) states: *In the event of risks and impacts in the project's area of influence resulting from a third party's actions, the client will address those risks and impacts in a manner commensurate with the client's control and influence over the third parties, and with due regard to conflict of interest.*

Regarding AOC's non-operated interests in a broader portfolio of projects, it is recognised that the application of its revised ESG systems, policies and standards of operations to these assets and projects is limited by what the Operator is willing and able to implement. The *Sustainability Reporting Guidance for the Oil and Gas Industry* (IPIECA, API and IAOGP 2020) refers to joint venture reporting, citing reporting agreements that can be entered into. Reference is made in this report to the previous IAOGP and IPEICA (2002) *Guidelines on Minimum Standards for HSE Governance in Joint Ventures*. This document refers to the need for joint HSE Policies, management teams and reviews. In the absence of such agreements then the influence of the non-operator parties may be quite limited.

It is noted that the revised AOC policies and procedures have only recently been developed, are in draft and have not yet been fully applied to existing or new investments, therefore the current assessment is high-level and presents recommendations rather than comments on non-conformances.

#### 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 in October 2020 with a video-conference link to AOC's offices in London and Nairobi. Copies of presentations and related documents were provided (see Appendix A).
- Activities were evaluated against the assessment framework to determine compliance with national laws and regulations, corporate requirements, and conformance with lender requirements.

### 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 reviews with updated and additional plans, procedures and associated documents provided for the current IMG review. Details of the documents provided for the current review are presented in Appendix A. The documents submitted for the previous IMG reviews are listed in the previous reports.

An operational update was presented to the IMG by AOC outlining operational and HSEC issues and management plans.

These covered the following main areas.

- Overview of AOC's current and planned operations and investments.
- Full Field Development Project update, revised draft ESIA and IFC comments on the draft TKJV Upstream Land Access Strategy.
- LLCOP update, ESIA status and copies of IFC comments on the draft LLCOP Resettlement and Livelihood Restoration Framework.
- Prime Oil and Gas (Nigeria non-operated asset) ESG Management, shareholders reports and Monthly Reports
- AOC ESG strategy, ESMS Framework, Policies, Standards of Operation and ESG Due Diligence Procedure.
- AOC Action on Climate Change and Shadow Carbon Pricing

### 3.2.3 Performance Evaluation

The status of the findings from the ESAP review and the HSEC performance, based on previous findings that remain open, are rated and evaluated according to the categories presented in *Table 3.1* and *Table 3.2*.

For the updated status on non-operated assets, and the review of the draft revised AOC Management System Framework and associated documents, these have not been assigned a rating, rather recommendations have been made for improvements to the AOC systems to conform with the IFC Performance Standards and related guidance (see Chapter 6).

**Table 3.1 Performance Status Ratings**

Performance 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 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 period.	Workplan to be completed with an agreed 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 conformance. Closed items are shown on the ESAP items to demonstrate progress. Closed items are removed from the PS Conformance Actions

**Table 3.2 Performance Status Ratings**

Assessment Rating	Criteria	Action
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 HSEC 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 on-going HSEC 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 HSEC 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. ENVIRONMENTAL AND SOCIAL ACTION PLAN

### 4.1 Conformance with Current ESAP Requirements

The current ESAP was developed in 2015 and focused on planned and potential operations in Ethiopia and Kenya. As discussed in Chapter 2, AOC has relinquished its Ethiopian interests, has no current operated assets in Kenya and has recently invested as minority shareholder and non-operator in other geographies. The current review assesses progress with the remaining open ESAP requirements, including providing updated planned completion dates for the draft ESIA's and associated plans.

Table 4.1 presents the IFC ESAP requirements, the tasks identified to be completed and status of actions. For the purposes of the current ESAP, the requirements relating to Ethiopia have been assigned as 'closed'. The ESAP requirements relevant to the current and planned operations in the South Lokichar Foundation Phase Project area are mainly closed, with some assigned as 'in progress', pending finalisation of documents or completion and approval of ESIA's. The more detailed project-specific requirements are presented in Chapter 5.

The 2015 ESAP was developed following the ESRS undertaken by the IFC. This report also had additional actions for AOC to undertake. Progress against these have been addressed in previous IMG reviews and the majority of these are now closed or will be addressed through planned document updates, for example provision of evidence that Free, Prior Informed Consultation (FPIC) has been undertaken through the FDD Foundation Phase Project SEP and Land Access agreements

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**Table 4.1 Evaluation of ESAP 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		Closed	Training process established and training undertaken
ESAP 1.2	(ii) hiring an Environmental, Social and Governance Manager.		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.		Closed	A SEP Framework document was produced by AOC and approved by IFC. The Ethiopia block have now been relinquished.
		Q1 2021	In Progress	For the South Lokichar Basin FFD Project, Tullow Kenya has prepared a Stakeholder Engagement Framework and Pre-Development Stakeholder Engagement Plan. These were finalised following review by the IFC. The Foundation Phase SEP is under revision and will be updated in Q1 2021 in line with the revised plans for the FFD Project.
ESAP 2.2	Company to prepare and submit ESIA's to IFC for review and approval – undertaken per project.		Closed	An ESIA for potential drilling on the west coast of Lake Abaya in Ethiopia was completed in Q2 2018. The Ethiopian Blocks were relinquished
		Q4 2021/2022	In Progress	For the South Lokichar Basin development, Tullow Kenya undertook an ESIA for EOPS in Q4 2018 and is finalising an ESIA for the FFD Project (drafts were disclosed on Tullow website in June 2020) and is expected to be completed in Q4 2021 with a Supplementary Assessment against IFC PSs in 2022. The LLCOP ESIA was submitted to NEMA in Q4 2019 and a Supplementary Assessment against IFC PSs is planned for Q4 2021.
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		As required	For the exploration phase of the South Lokichar Basin development, Tullow Kenya has prepared a <i>Stakeholder Engagement Framework, Pre-Development Stakeholder Engagement Plan</i> and <i>Land Acquisition and Resettlement Framework</i> that outlined the approach required to achieve and document FPIC based on the definition of the project footprint and specific impacts. These were finalised following approved by the IFC. For future phases of the project, the FPIC process will be further developed, agreed with the IFC and evidence of its implementation in agreements made provided to the IFC.

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
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 associated country specific implementation procedures		Closed	Tullow Kenya has an Employee's Handbook that includes a Human Resources Policy. This has been reviewed by the IFC and confirmed as acceptable.
	(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		Closed	Tullow Kenya follows national law and conformance with IFC requirements regarding retrenchment as evidenced in relevant HR procedures that provided during previous IMG reviews.
	(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.		Closed	Framework document has been produced and approved by IFC.
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.		Closed	Framework document has been produced and approved by IFC.
			Closed	Tullow Kenya 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.
ESAP 5.1	The Company will develop Land Acquisition and Livelihood Restoration (LALR) Plans for each of the two countries (Kenya, Ethiopia).	2021	Closed	Framework document has been produced and approved by IFC.
			In Progress	A draft Land Access Strategy and draft Land Access and Resettlement Framework (LARF) have been prepared for the South Lokichar Foundation Phase project. These have been reviewed and commented on by the IFC. Once the strategies and frameworks are finalised, detailed project specific plans, including procedures for any supplementary benefits and entitlements, will be developed. It is expected that this will be completed in 2021, subject to completion of the government-led evaluation and land acquisition process.
ESAP 5.2	The Company will redesign its compensation plan in Ethiopia to incorporate procedures to		Closed	Compensation Plan redesigned and the Management of Change provided to IFC as evidence.

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
	compensate prior to commencing work, vacating land and any potential damage that could occurred after seismic survey.			
ESAP 6.1	i. The Company will develop a biodiversity strategy for Kenya as described in the ESRS.		Closed	AOC have issued a Biodiversity Management Strategy (KE/ESG/FRM/BD/2017/8) that has been aligned with the Operators Biodiversity Management Framework that has been accepted by the IFC (see below).
			Closed	For blocks where Tullow Kenya is the Operator, a Kenya Biodiversity Management Framework has been produced and accepted by the IFC. In the event that critical habit is identified in later stages of the project or in new areas, then the strategy will require to be updated to address the relevant PS requirements.
			Closed	A biodiversity panel has been set up and a Terms of Reference agreed (commented on by the IMG during the fourth review). This first panel meeting was held in early April 2018 and the second meeting was held in January 2019.
	ii. The Company will develop a similar plan prior to any substantive work related to development of successful wells in Ethiopia		Closed	Ethiopia blocks have now been relinquished.
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.		Closed	AOC commissioned an ESIA for the potential exploratory drilling well at Lake Abaya. The ESIA was completed in Q2 2018.
			When required	For the South Lokichar Foundation Phase Project this requirement is addressed under ESAP item 2.2. AOC currently has no other planned developments that require an ESIA.

Notes: Grey shaded items are closed. It is recognised that there remains some uncertainty on completion dates due to ongoing project delays and Covid-19 pandemic related travel restrictions.



## 5. ASSESSMENT AGAINST IFC PERFORMANCE STANDARDS

### 5.1 Introduction

This chapter provides an update on previous findings and recommendations made with respect to the South Lokichar Project and on the investment in the Nigeria OML 127 and 130 blocks. Regarding AOC's other non-operator investments, as these are mainly at early exploration/data review stages, no information on significant ESG risks and issues were available for the current review.

### 5.2 South Lokichar Project Update

In the previous IMG review, there were a number of findings from that review and from previous reviews related to the South Lokichar Project. Due to ongoing project delays and the demobilisation of many of the KJV project team members, limited progress has been made on many of these findings. The findings were mainly related to the need to finalise and operationalise various environment and social management plans and procedures to conform to the IFC Performance Standard requirements.

It is noted, however, that most of the draft and final Operator's procedures and guidance documents assessed in the previous reviews will be superseded by the Project ESMS and associated Operator and Contractor ESMPs to be developed prior to the FFD Project construction and operations. These FFD Project systems, plans and procedures will require to conform to the requirements of the IFC PSs and associated EHS guidance and will therefore require IMG and IFC review during development and implementation. Where previous findings are relevant to future activities associated with the upstream project, the relevant findings remain open. The narrative provided in the previous IMG review is not repeated here, however, the summary of the findings are presented in Table 5.1. Where relevant, the findings have been updated based on new information provided to the IMG, such as the revised draft of the upstream ESIA. These have been assigned as a Level 1 finding as there is no immediate environmental and social risks, given the current low level of onsite activity. These will be re-assessed in future reviews, depending on the changes to the Project design, the activities being undertaken or planned at that time, and the status of the required plans and procedures.

As discussed in chapter 2, additional baseline data collection to address information gaps will be undertaken during 2021. The existing SEP is to be updated in early 2021 to address ongoing consultation and disclosure activities and in preparation for future activities. The process of review and update of the SEP will be required as the FFD Project develops over the next few years prior to commencement of construction activities with a focus on localised disclosure on community health and safety issues, land access issues and the grievance mechanism.

The draft South Lokichar Development Land Access Strategy and draft Land Access and Resettlement Framework for the Upstream and Midstream have both been reviewed by IFC and comments have been provided to AOC. The IMG commented on drafts of these documents as part of the previous (seventh) review. The detailed implementation plans are due to be prepared following completion of statutory land acquisition by the National Land Commission and hand-over of household/socio-economic data to the Project. These plans are due to be updated in Q1 2021 will be reviewed by the IMG at the next scheduled review.

**Table 5.1 South Lokichar Foundation Phase Evaluation of IFC PSs**

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
<b>Performance Standard 1 Assessment and Management of Environmental and Social Risks and Impacts</b>						
Dec 2015 Rev1-PS1-1	<i>Environmental and Social Assessment Management Systems, Policy, Identification of Risks and Impacts, and Management Programmes</i>	Previous IMG reviews identified that the various project and Company documents were a combination of controlled documents and uncontrolled documents and draft reports without issue dates and revision/status.	ESMP and associated mitigation measures, commitments and monitoring requirements that are required by the Operator and the Operator's contractors will need to form part of the tender process and contractual documentation to ensure that commitments are carried forward to detailed project plans and procedures.	Operator HSE and SP Teams with respect to their relevant operations.  Prior to commencement of construction activities, expected in 2022.	In Progress  This revised draft ESIA includes an E&S Management Framework that presents the key mitigation measures and project commitments that will require to be adopted by the Operator and its contractors.	Level I  Action required to address this issue to avoid future risks
Jun 2016 Rev2-PS1-1						
Feb 2018 Rev7-PS1-1						
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. The operator is developing a Human Resources Procedure including competency frameworks. It was reported that some of these have been completed and others are under development.	It is expected that the Human Resources Procedure will be finalised and operationalised to ensure and demonstrate that a robust process is in place prior to increased work activities, and to fulfil the requirements of PS1.	Operator HR Department  Prior to commencement of construction activities expected in 2022. .	In Progress  A Human Resources Procedure will be developed once the Project recommences following the current suspension of the main Project activities.	Level I  Action required to address this issue to avoid future risks

<b>Performance Standard 2 Labour and Working Conditions</b>						
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.	The <i>Contractor Non-Technical Risk Management Procedure</i> (which covers the expectations of contractors and their key obligations for delivering a Non-Technical Risk Management Plan for their specific activities) requires to be finalised for the FFD construction phase.	Operator EHS Team  It is expected that these procedures will be finalised and made operational prior to commencement of construction and other on-site activities involving contractors.	In Progress  <i>Contractor Non-Technical Risk Management Procedure</i> is undergoing a review and update and was not available for the current IMG review.	Level I  Action required to address this issue to avoid future risks
<b>Performance Standard 3 Resource Efficiency and Pollution Prevention</b>						
Mar 2018  Rev5-PS3-1	<i>Greenhouse Gas Emissions</i>	The Operator collates companywide CO <sub>2</sub> emissions through Procedure (T-KE-ESP-PRO-0004) and (T-ESP-PRO-0001).  The FFD ESIA reported the project specific emissions, assuming a worst case of flaring excess associated gas. Further design work is ongoing to evaluate alternatives.	A procedure for the annual collation and reporting of greenhouse gas emissions at project level should be prepared. Where emissions are estimated to be more than 25,000 tonnes per annum then options to improve efficiency and preventative maintenance plans will be required.	Operator EHS Team  Project-specific procedure to be developed following a decision on options for dealing with excess associated gas, expected. To be addressed in FEED expected in 2021.	In Progress  Data on predicted project emissions is being reported once alternative options fully evaluated during the current redefined project FEED.	Level I  Action required to address this issue to avoid future risks
<b>Performance Standard 5 Land Acquisition and Involuntary Resettlement</b>						
Mar 2018  Rev5-PS5-1  Feb 2020 Rev7-PS5-1,2,3	<i>Land Access and Resettlement Framework</i>	A revised <i>Land Access and Resettlement Framework (Dec. 2019)</i> and associated strategy was reviewed and is generally aligned with PS 5. This document defines a revised land acquisition process, decoupling the GoK led statutory land acquisition process from KJV's commitments for PS 5	Finalise the Land Access and Resettlement Framework, confirming the actions required to bridge the gap between GoK and IFC PS 5, including the provision of supplementary payments to achieve full replacement cost. Develop RAP and LRP to settle affected households and restore livelihoods. These plans must also specify an appropriate stakeholder engagement process and grievance	Operator Social Performance Team  Final LARF, RAP and LRP to be finalised and made operational prior to commencement of construction and other on-site activities.	In Progress  The IFC have commented on this framework document and an update is now being developed. Procedures for full replacement cost to be decided and incorporated into	Level I  Action required to address this issue to avoid future risks

		alignment, including supplementary compensation.	mechanism for affected individuals and households, including affected indigenous peoples as per PS7 requirements.		LARF. RAP and LRP to be developed.	
<b>Performance Standard 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>						
Dec 2015  (Rev1-PS6-1, 6-2, 6-3, 6-5, 6-6, 6-7, 6-8,  Jun 2016  Rev2-PS6-9)  Feb 2020  Rev7-PS6-1	<i>Baseline Biodiversity and Habitat Assessment; Ecosystem Services Screening; Conservation Significance Mitigation; Supply Chain Sustainability Assessment; and Monitoring and Evaluation Criteria</i>	The revised draft ESIA for the FFD Project now includes habitat mapping, an Ecosystem Services assessment. Critical Habitat has been identified within the Project area. The detailed mitigation strategies and monitoring requirements for a number of key issues have been deferred to the development of detailed management plans. These include the Biodiversity Management Plan (and Biodiversity Action Plan for critical habitats) and Invasive Species Management Plan, amongst others.	The ESMP developed from the ESIA and the BAP should address monitoring and evaluation criteria for biodiversity impacts.	Operator HSE Team  The ESMP, BMP and BAP will be required prior to commencement of FFD construction activities, expected in 2022.	In Progress  Outputs from the habitat mapping study along with mitigation measures within the ESMS to be used to develop the BMP and BAP.	Level I  Action required to address this issue to avoid future risks
June 2016  Rev2-PS6-10  Feb 2020  Rev7-PS6-2	<i>Restoration activities</i>	<i>Line Clearance and Restoration Guidelines (T-KE-EHS-GUD-0003 Rev 02)</i> outlines the general approach to managing restoration of disturbed sites. A number of sites that are no longer required have been or are planned to be restored and a site-specific approach requires to be developed.	The restoration guidelines to be updated, drawing on lessons learnt from restoration activities undertaken to date and incorporating the outcomes of the discussions with the TCG. The guidance should include monitoring and maintenance schedules, where required, for future site restoration practices.	Operator HSE Team  It is expected that the procedures will be finalised and made operational prior to construction activities commencing on site, expected in 2022.	In Progress  Pending outcome of discussions with TCG on requirements and standards for restoration and hand-back of sites.	Level I  Action required to address this issue to avoid future risks.

Dec 2015 Rev1-PS6-5 Jun 2016 Rev2-PS6-11	<i>Invasive Species Management</i>	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 existing invasive species management list is contained in the broader Kenyan Biodiversity Management Plan.	An <i>Invasive Species Management Procedure</i> should be produced to relate to site-specific requirements and incorporated into site specific EHS MPs.	Operator HSE Team  It is expected that the procedures will be finalised and made operational prior to construction activities commencing on site, expected in 2022.	In Progress  This requirement should be aligned with the site restoration guideline update described above.	Level I  Action required to address this issue to avoid future risks.
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## 5.3 Nigeria Blocks OML 127 and 130

### 5.3.1 Previous Review

In the previous IMG review, the 2018 Due Diligence report undertaken for Delonex for the non-operated investment in the OML 127 and OML 130 blocks in deep water offshore Nigeria was reviewed. A number of recommendations were made to address information gaps with respect to the IFC Performance Standards. These covered the following issues.

- Flaring.
- Compliance with Permitted Limits.
- Stakeholder Engagement and Grievance Mechanism - no evidence of community grievance logs.
- Worker Rights - no evidence of worker grievance logs, nor any specific details on the management of worker rights.
- Worker Health and Safety - limited data on recordable incidents or performance against KPIs.
- Waste Management - no detail on waste management provided.
- Biodiversity- no monitoring data or management plans provided.
- Cultural Heritage – no evidence of a chance find procedure.

Given the offshore, deep-water locations a number of these were assessed as being of low significance and priority, however the flaring and non-compliance with permits limits were considered significant and of high priority to obtain further information on the nature of the risks.

### 5.3.2 Flaring

The Delonex ESDD report highlighted that flaring of associated gas was being undertaken from the Agbami and Akpo FPSOs (Egina was not operational at the time of the review). The high flaring rates for Agbami were reported as being primarily related to an issue with the gas compressors (GCT), that the operator, Chevron, was taking steps to address this, and that the regulator was being kept informed. It was noted that the Government of Nigeria, Chevron, Total and the World Bank are all partners in the Global Gas Flaring Reduction Partnership (GGFR). The GGFR aims to reduce gas flaring and increase the use of natural gas associated with oil production by working to remove technical and regulatory barriers, undertaking research, sharing GIIP as well as developing country-specific programmes to reduce gas flaring.

In the previous IMG review, a number of recommendations were made to obtain more information on the flaring activities and measures being planned or undertaken to reduce these. These included obtaining information on any submitted programmes for associated gas utilisation/ minimisation required under Nigeria's *Associated Gas Re-injection Act* and any flaring related communications with the Ministry of Petroleum Resources, including any fines, from both operators.

From the information provided to the IMG for the current review (examples of monthly reports, Prime Oil and Gas Q3 and 9M 2020 Shareholders Report) there is reference to recorded decrease in flare volumes in all three fields with the marked improvements at Agbami (reduction from 64 million standard cubic feet per day (mmscf/d) in Q1 2020 to 32 mmscf/d in Q3 2020) related to the repair and maintenance of the GTCs. The Operator's longer term target for Agbami is 10 mmscf/d, although details on when that is targeted to be achieved was not made available. Across the three fields, there was a predicted decrease from initial estimates of 69.2 mmscf/d in 2020 to an expected 36.8 mmscf/d to the end of 2020 (a decrease of 53%). Details of the root cause analysis of the previously reported 2018 high flaring volumes, the agreed flare reduction programmes and the sources and methods for the current greenhouse gas (GHG) emission calculations were not provided in the reports reviewed.

### 5.3.3 Compliance with Permitted Limits

AOC has developed a draft Standard of Operations for Reporting of Accidents and Incidents (AOI-SO-RAI-001, dated 21 August 2020) that addresses the requirement to report all incidents including near misses, hazards, occupational illness and asset-integrity related hazards. The reporting requirements are based on a series of three incident categories. Category 3 incidents include fatalities, environmental spills that require Tier 3 responses (ie requires national or international level response), and community incidents that causes an armed response or work to stop for more than one day. Category 2 incidents include serious injury requiring medical treatment, sustained breaches of regulatory limits, permit or licence conditions that requires mandatory reporting to regulatory authorities. Whilst the Standard of Operation makes reference to near misses and asset integrity hazards, these are not listed in the Incident Reporting Matrix, which would be required to meet GIIP.

AOC requires that Operators, in the monthly EHS reports, should provide a summary of findings of any Incident Report prepared and set out measures implemented to reduce the likelihood of similar events occurring in the future. However, as stated in AOC's Standard of Operations for Reporting of Accidents and Incidents, for non-operator roles AOC's ability to influence conformance with this standard is limited.

As part of the current Review the IMG were provided with copies of the November 2020 quarterly Shareholders' report from Prime Oil and Gas, as well as example copies of monthly reports and correspondence between AOC and Prime Oil and Gas on what reporting data is likely to be available from the Operators (Total and Chevron). While the report covers some of the required information, for example on lost time injuries and oil spills, it does not provide information on breaches of permit conditions for emissions (exceedance of air quality standards), discharges (exceedance of compliance limits for seawater quality) and any related fines. Insufficient detail on the type and sources of total GHG emissions is provided, making it difficult to understand the contribution of GHG emissions from each source. These details, in the monthly/quarterly EHS reports, or from other sources, are required to allow the root causes to be understood, and progress with improvement programmes agreed with regulators, to be monitored.

Continued non-compliance with the permitted emission and discharge levels and monitoring requirements constitute a material, and therefore reportable risk, to the operations. Further work is required by AOC to obtain more details on the causes of these breeches and to get a clearer understanding of what actions are planned or being undertaken to address these. . See also the recommendations section in Chapter 6 regarding this issue.

## 6. ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM REVIEW

### 6.1 Overview

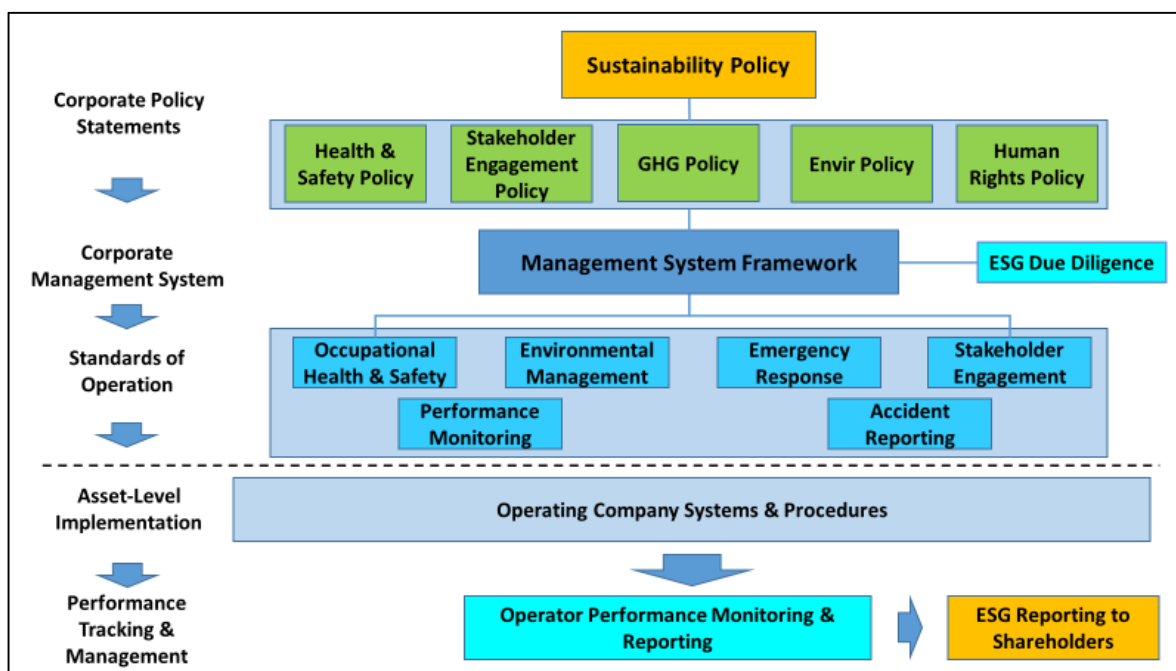
The AOC's environmental and social management system per IFC PS1 (2012) is the AOC Management System Framework. The AOC Environmental and Social Management System (ESMS) Framework is underpinned by a series of policies and standards of operation that sit within the overall ESMS Framework. These replace earlier framework documents that were reviewed during previous IMG reviews and by the IFC.

AOC has also issued the new ESG Due Diligence Procedure (14 August 2020) which details how AOC will conduct environmental and social due diligence (ESDD) on potential new equity investments and corporate loans (i.e. as a non-operator). The ESG Due Diligence Strategy was prepared in response to a significant change in AOC's investment portfolio in 2019/2020, which now includes exploration, development and producing assets, mainly on a non-operated basis.

A review of the new AOC ESMS Framework and the new ESG Due Diligence Strategy is provided in Section 6.2 AOC Management Systems. Comments on AOC's GHG Emissions Management Policy and planned ESG reporting are provided in Sections 6.3 and 6.4 respectively. Overall recommendations are presented in Section 6.5.

The AOC ESMS Framework is illustrated in Figure 6.1.

**Figure 6.1 AOC ESMS Framework**



Source: AOC 2020. Management System Framework

### 6.2 Corporate Level

The revised AOC ESMS Framework and associated policies and standards of operation were approved by the AOC Board in August 2020 and disclosed on AOC's website. The documents are focussed on the corporate level, given that AOC is mainly a non-operator, with detailed systems, plans and procedures required to be developed for operated assets. The overarching Sustainability Policy references activities being undertaken in accordance with the requirements of the IFC PS where AOC have operational control (see Section 6.3.2 regarding commitments for non-operated assets). The ESMS Framework also references the IFC PS in terms of AOC's commitment to



standards of operation that meet good industry practice. A number, but not all, of policies also make direct reference to the IFC PSs (eg Environmental Policy, Human Rights Policy, Stakeholder Engagement Policy) as do a number of the Standards of Operation (Workers Health and Safety, Community Health, Safety and Security, and Stakeholder Engagement and Community Relations). Implementation of the AOC Policies are overseen at AOC Board level with the implementation of the Standards of Operation being overseen at Chief Operating Officer level. The ESMS Framework will be reviewed once a year, or sooner if required to address significant changes. The associated Policies do not state a review period, however the Standards of Operations are to be reviewed every two years.

The ESMS Framework conforms to the requirements of the IFC Performance Standards on Environmental and Social Sustainability (2012), with respect to setting up a system to identify and manage risks, as they relate to AOC's role as an operator. Reference is made within the ESMS Framework and associated policies to the IFC PS. The policies states that "Where we have operational control, all activities will be planned and implemented in accordance with the more stringent of national regulatory requirements and the Performance Standards on Environmental and Social Sustainability of the International Finance Corporation. Where we do not have operational control, we will work with our Operating Partners to the extent possible to ensure that activities are undertaken in a manner consistent with this Policy."

The AOC ESMS Framework is guided by the principles set out in an overarching AOC Sustainability Policy. This policy covers the following environmental and social criteria:

- Health, Safety and Wellbeing;
- Our People;
- Environment;
- Our Host Communities;
- Human Rights;
- Governance and Stewardship; and
- Application and Accountability.

The AOC Sustainability Policy states specifically that AOC "will develop an appropriate management system to implement this Policy, and measure performance as part of a process of continuous improvement". In addition, the AOC Sustainability Policy references further standalone policies that provide further details and support the execution of the policy. These standalone policies are listed as follows.

- AOC Health and Safety Policy.
- AOC Stakeholder Engagement Policy.
- AOC Greenhouse Gas Policy.
- AOC Environmental Policy.
- AOC Human Rights Policy.

The AOC Sustainability Policy and associated standalone policies are implemented through an AOC Management System Framework based on the 'Plan-Do-Check-Act' format.

For each of the above components the AOC ESMS Framework provides guidance on the objective, scope, and procedures that would need to be developed for each asset being operated by AOC. To give effect to certain of the key components, the ESMS Framework requires the development of Standards of Operation. These Standards of Operation are adopted and implemented at the asset level for AOC operated assets.

To date, the following Standards of Operation have been developed at the corporate level.

- Community Health, Safety and Security.
- Emergency Preparedness and Response.
- Performance Monitoring and Reporting.
- Reporting of Accidents and Incidents.
- Stakeholder Engagement and Community Relations.
- Worker Health and Safety.

The security element of the Community Health Safety and Security Standard of Operation makes reference to the requirement for all AOC activities complying with the Voluntary Principles on Security and Human Rights. These are also listed, amongst other commitments, within the AOC Human Rights Policy.

The AOC ESMS Framework further outlines roles and responsibilities of AOC staff and contractors in implementing the AOC MS and monitoring requirements.

For operational roles, there are a number of steps that would be required to develop the current Standards of Operation into effective E&S risk and impact management plans and procedures that make specific references to the requirements under IFC Performance Standard 1 (and relevant requirements under Performance Standards 2-8). These include in the following main areas.

- Developing hazard and risk management procedures, hazard and risk assessments and development and maintenance of an asset/project Risk Register.
- Development of additional Standards of Operation to address identified hazards and risks e.g. on Labour and Working Conditions, Resource Efficiency and Pollution, Land Acquisition and Involuntary Resettlement, Biodiversity Conservation and Cultural Heritage.
- Outline organisational capacity and competency, definition of the structure, roles and responsibilities of the AOC board, CEO and EHS staff, and ongoing training requirements.
- Project and asset-specific Emergency Response and Preparedness plans.
- Monitoring H&S, environmental and social performance and compliance with legal and contract/permit requirements.
- Project and asset-specific Stakeholder Engagement Plans and worker and community Grievance Mechanisms.

The Africa Oil board, and its ESGHS Committee, provides direction to the company's activities, based on setting objectives and goals for ESG management that are then monitored by the board.

### **6.2.1 ESG Due-Diligence Procedure**

The AOC ESG Due Diligence Procedure lays out the process AOC will implement when evaluating environmental, health and safety, and social performance risks related to potential new acquisitions or investments (of \$10 million or more).

The stated objectives of this procedure are to:

- define the scope of ESG due diligence required for different types of transaction;
- set out the basic ESG issues to be addressed during due diligence;
- set out the process to ensure that potential GHG emissions are factored into the due diligence process; and
- define roles and responsibilities.

The ESG Due Diligence Procedure differentiates requirements based on the type of transaction and the nature of the asset. The procedure defines three categories of investments (Minority Stake, Operatorship within a Joint Venture, and Sole Ownership), and four categories of assets ranging from lower risk exploration data review to higher risk full operation:

- Exploration, data interpretation only;
- Exploration drilling and appraisal;
- Development; and
- Operations.

The procedure will initially produce a 'Red Flag' screening report that may result in the potential transaction being reconsidered. If the decision is taken to proceed, a site visit and/or the commissioning of an independent party due diligence assessment may take place depending on asset risk characteristics. Subsequently, an ESG Due Diligence report will be prepared for internal review.

An ESG Due Diligence Screening Checklist is also provided, which lists a number of the potential environmental and social risks and impacts identified in the IFC Performance Standards (2012) as well as corporate governance.

The AOC Board reviews all proposed transactions and uses the ESG due diligence summary as a key tool to evaluate each transaction and to make an informed decision as to whether to endorse a management recommendation to proceed with a transaction, while also setting out any requirements or conditions (including related to ESG) to be factored into further due diligence. If the transaction is approved by the board of directors, an Environmental and Social Action Plan (ESAP) will be prepared based on the findings and recommendations of the ESG Due Diligence report. Direct reference to the IFC PSs WBG EHS Guidelines are not made within the ESG DD Procedure. The procedure does refer to sharing AOC ESDD reports for completed transactions with the IMG as part of periodic assessment of AOC's compliance with the IFC PSs and that AOC will review any relevant ESAPs with the IMG and agree any appropriate revisions. This requirement depends on the project phase and the nature of the transaction. Reports are not shared for exploration phase transactions that involve data interpretation only and where AOC has a minority stake in exploration/appraisal drilling. For transactions involving exploration/appraisal drilling phase assets (where AOC is the operator in a JV or sole owner) and for Development or Operations phase assets (where AOC has a minority stake, is the operator in a JV or sole owner) then the ESG DD reports will be shared. For transactions where AOC is the sole owner of assets that are in the Development or Operations phases, then the ESAP will be agreed with the IFC.

It is noted that the ESG DD procedure was in late 2020 and at the time of this IMG review, no potential transaction had progressed beyond the preliminary due diligence stage.

## 6.3 Asset Level

### 6.3.1 Operated Assets

The policies, Management System Framework and developed Standards of Operation are all corporate level management systems primarily designed to be adopted and implemented at an asset level in instances where AOC is an Operator. As such, for each operated asset, AOC will develop an asset-level ESMS, in alignment with the AOC Corporate Management System Framework.

In addition to these policies and standards of operation, if AOC takes on an operator role in any existing or future blocks then project specific ESAs and any other regulatory requirements may be developed as necessary. As discussed above, the ESG DD Procedure includes the requirement for an ESAP to be developed for operated assets in the exploration and appraisal drilling, development, and operations phases.

### 6.3.2 Non-Operated Assets

AOC require that all their operated projects and invested non operated sub-projects conform to the IFC PSs. For non-operated assets, the level of influence that AOC has over conformance with the IFC PSs, and to obtain reportable information to demonstrate this conformance, varies depending on the nature of the investment. This issue is acknowledged in AOC's Standards of Operation that state that the AOC standards will be used as 'far as practicable' with Operating Partners and AOC will make reasonable efforts to ensure conformance with the AOC standards. The aim is to exert a positive influence on the operations by providing support through the JV representatives and/or appointed JV board members so that health, safety, environment and social performance policies and commitments are adopted that meet the requirements of all the parties.

For JV arrangements, such as with Tullow Kenya, or where AOC has a position on the Board of Directors of the company invested in, the level of influence is higher than where AOC is one step removed from the operator or JV through an invested interest. The level of risk also varies with location and nature of the assets and with the capacity and experience of the Operator. These factors will influence the level of support from, and oversight by AOC, required.

## 6.4 GHG Emission Management Policy

AOC has developed a Greenhouse Gas Emission Management Policy (draft dated August 2020) which references its commitment to contributing to the goals of the 2015 Paris Agreement through monitoring, management and reporting of greenhouse gas emissions associated with its activities and investment decisions. A Climate Action and Disclosure Study was undertaken by Accenture in 2020 that presents a series of recommendations and a roadmap with short, medium and long term actions for AOC, including positioning AOC to align with Climate Related Financial Disclosures (TCFD) requirements. The report recommended using shadow carbon pricing as part of AOC's risk management processes and AOC has since developed (July 2020) a method statement for the use of this mechanism in its ESG due diligence for potential new investments.

The IMG reviewed the policy, Accenture report and related documents provided by AOC and concurs with the analysis and recommendations made. A number of observations are provided below on some of the specific requirements.

AOC has committed to an annual review of its portfolio to assess its resilience to climate change scenarios in relation to physical climate change risks across their assets and investments. Ongoing review of the implications of the Paris Agreement on operated or invested assets will also be required, particularly in relation to development of Nationally Determined Contributions (NDCs) for the countries that AOC has interests in. For example, Nigeria's NDC (submitted in March 2017) builds on the 2012 'Nigeria Climate Change Policy Response and Strategy' and signals its intent to decarbonise, which may have an impact on AOC's current and potential future investments in the offshore producing assets. Key to AOC achieving its GHG management aims will be quantifying emissions GHG emissions from operated assets, non-operated assets and other investments. Obtaining such information is also a requirement of the AOC ESG Due Diligence Procedure for new investments.

As part of AOC's ESG strategy, it has stated its intension to monitor and report GHG emissions data in a manner to allow the calculation of emissions efficiency (in kg CO<sub>2</sub> equivalent per barrel of oil equivalent). This is an important metric to report alongside the emissions data to demonstrate performance over time and to benchmark against peers. GHG emission are included in AOC's minimum reporting requirements in its Performance Management and Reporting Standard of Operation.

Examples of the data provided by operators to date is high level, providing volumes of gas flared and total GHG emissions as CO<sub>2</sub>-equivalents. There is no breakdown on the types of GHG, specifically on the volume of methane emitted, and no information on the sources (flaring, combustion, venting and fugitive).

## 6.5 Monitoring and Reporting

AOC developed an ESG strategy in February 2020 with a greater focus on governance of shareholder equity given AOC's equity investments in a number of exploration, development and producing assets. As discussed in the previous sections, systems and procedures to monitor H&S, environmental and social performance of AOC's JV partners and other invested interests have been established. These include the Standards of Operation on Reporting of Accidents and Incidents and Performance Monitoring and Reporting.

AOC is at an early stage in the process of monitoring and reporting and only limited data has been received from operators to date (no data from exploration and development assets with current focus on obtaining data from the Nigeria producing assets). As part of external reporting commitments related to these standards, AOC have contracted Buchannan Communications to prepare AOC's first ESG performance section for its quarterly shareholder report in Q1 2021. The ESG reporting will identify the most significant issues to AOC and its shareholders through a materiality assessment, drawing on good international industry practice reporting requirements including those of IPIECA, GRI and SASB, amongst others. Details of the planned reporting structure, content and how conformance with the IFC PSs will be addressed are not yet available therefore the outcome of this process will be reviewed at the next IMG review.

## 6.6 Recommendations

For existing assets, AOC should continue with its efforts to exert its influence to obtain the required data for reporting on the most material issues that present risks to its investments in order that it can assess conformance with the IFC PSs and applicable ESH Guidelines. These include the following key areas.

- GHG, flaring and permit conditions.
- Emissions and discharges, including drill cuttings and produced water with respect to standards/permit conditions (amongst other environmental criteria).
- Process safety, worker health and safety and security.
- Labour related issues.
- Accidents, incidents, spills.
- Fines, non-compliances, permit breaches.
- Grievances/complaints from workers or third parties.

With respect to the Management System Framework procedures and standards the following recommendations are made

- As AOC is required to apply the IFC Performance Standards (2012) and applicable EHS Guideline per IFC's equity investment, the IFC PS and applicable EHS Guidelines should be explicitly referenced in Section 4.3, ESG Due Diligence Screening Checklist.
- Policies should be signed to demonstrate senior management approval.
- The due diligence procedure should incorporate a risk factor based on increasing risks across the asset stage categories (e.g., from exploration data interpretation only to full operation) and AOC's ownership position as identified in the ESG Due Diligence Matrix, recognising AOC's ability to exert influence declines from a sole ownership position to a minority stake position.
- AOC should develop and maintain an asset based risk register and related risk management action plan for current activities and for when existing assets move into new phases (e.g. exploratory drilling, appraisal, development, production). For lower risk assets, oversight may be achieved through obtaining copies of monthly/quarterly reports from the Operators, but for higher risk assets the action plan may include reviews/audits to assess performance against IFC

PS/EHS Guidelines and the development of timebound corrective action/improvement programme to address gaps (to be developed with the operator). The review of the risk register and actions required to address emerging issues should be overseen at AOC board level, ie through scheduled presentations to the board.

- The AOC ESG DD procedure should include an assessment of the operator's capability and capacity to conform with the relevant IFC PS and the ability of AOC to have the level of influence, oversight and access to performance data that it requires. This would provide a firmer basis for obtaining information to meet AOC's management and reporting framework. Mutually agreed reporting formats should be aligned with each party's requirements, based on industry guidance (e.g. IPEICA, SASB, GRI, EITI, TCFD).
- Revise the new Performance Monitoring Standard of Operation to focus on obtaining the required information to demonstrate conformance with the IFC PS.
- With respect to GHG emissions calculations, the AOC method should address variations in the type of quality of data that will be provided by Operators and how that will be used for reporting. This includes the differences in the emissions calculation methods, conversion factors, intensity metrics and reporting structures used. As future reporting requirements may need a more detailed breakdown of the type of GHG, obtaining disaggregated data, in a standard format, from operators and other parties will be needed to prepare AOC to disclose information through different reporting mechanisms (e.g. GRI, CDP, TCFD), as well as for monitoring the performance of the assets within AOC's portfolio.
- Regarding reporting, AOC should describe its current assets as per the ESG Due Diligence Matrix, describe how they are performing, and what, if any, measures AOC is taking to resolve issues or address corrective actions. AOC should also consider relevant granularity in their planned ESG reporting structure to demonstrate how each asset is performing against the IFC PSs and the applicable EHS Guidelines. The materiality assessment for reporting should include relevant IFC PS requirements (i.e., resource efficiency, livelihoods, biodiversity) as well as the current identified issues in the draft ESG reporting Materiality Matrix.
- To support continuous improvement, as well for internal and external reporting, the requirement to report and monitor near misses and process safety/asset integrity upsets should be detailed more explicitly at a Category 1 incident in the Reporting of Accidents and Incidents Standard of Operation (AOI-SO-RAI-001). These should also feature in the minimum reporting requirements in the Performance Monitoring and Reporting Standard of Operation (AOI-SO-PMR-001).

## 7. CONCLUSIONS

### 7.1 ESAP Requirements

This review presents an assessment of AOC's progress with the ESAP requirements, identifying those actions that have been completed, are in progress or pending commencement of activities. The ESAP requirements relevant to the current and planned Tullow Kenya operations in South Lokichar are mainly closed, with some pending revisions to draft documents or completion of current ESAs.

AOC has now acquired non-operator interests in producing assets offshore Nigeria and has other non-operator interests in offshore exploration and appraisal programmes in South Africa, Namibia, Senegal/Guinea Bissau and Guyana.

### 7.2 South Lokichar FFD Project

Updates have been provided on the actions arising from the previous reviews of the South Lokichar FFD Project activities, systems and procedures, including actions arising from the review of the upstream and midstream ESAs. Most actions are pending the recommencement of activities on site and further developments with the project as it moves into FID and then construction and operational phases. Final ESAs, supplementary documents and associated plans are scheduled for completion for the end of 2021 and into 2022 with detailed construction management plans and associated procedures to be developed by the appointed PMC and EPC contractors in due course.

The outstanding actions have been assigned as a Level 1 finding where there is no immediate environmental and social risks, given the current low level of onsite activity. These will be re-assessed in future reviews, depending on the activities being undertaken or planned at that time and the status of the required plans and procedures.

The EOPS project and the trucking of crude oil from South Lokichar to Mombasa has now ceased and the project infrastructure is being decommissioned so previous findings with respect to these operations are closed.

### 7.3 Nigeria Offshore Producing Assets

In the previous IMG review, a number of recommendations were made to obtain more information on the activities in the offshore Nigerian assets, in particular the GHG emissions and the measures being planned or undertaken to reduce these. These included obtaining information on any submitted programmes for associated gas utilisation/ minimisation and any flaring related communications with the Ministry of Petroleum Resources, including any fines, from both operators. Limited information has been provided by the operators to date, however, it does show improvements in the volume of gas flaring being undertaken. The IMG has recommended that further attempts are made to obtain more detailed information on the causes and agreed improvement programmes so that the nature of the risks are more fully understood.

### 7.4 Management System Review

To address issues arising out of its broader portfolio of interests, AOC has revised its Corporate Environmental and Social Management Framework and associated corporate Policies, Standards of Operation to be applicable to potential future operational roles and for oversight of its interest in non-operated assets. At a corporate level, these new policies and standards are aligned with the requirements of the IFC Performance Standards (PSs) with respect to establishing systems to identify and manage risks. For non-operated assets, the level of influence that AOC has over conformance with the IFC PSs, and to obtain reportable information to demonstrate this conformance, varies depending on the nature of the investment. AOC has also developed an ESG Due Diligence Procedure for potential new investments.

The Management System Framework includes requirements for performance monitoring and reporting, including greenhouse gas reporting. AOC is at an early stage in the process of monitoring and reporting with the first quarterly external reporting scheduled for the first quarter of 2021.

Recommendations are made on strengthening the ESG Due Diligence Procedure to further address risk management and for updates to the Performance Monitoring Standard of Operation to focus more on obtaining the required information from non-operated assets to demonstrate conformance with the FC PSs and to support the planned ESG reporting requirements.

## **7.5 Recommendations for Next Review**

The focus of the next review will be dependent on the level of activity at existing assets, future investment decisions, the outcome of ESG reporting process and any revised ESAP agreed between the IFC and AOC. The implementation of the ESMS framework and AOC oversight of its non-operated assets are likely to be key areas of focus. The next review is currently scheduled for the second quarter of 2021.



## APPENDIX A      ADDITIONAL DOCUMENTS PROVIDED BY AOC FOR CURRENT REVIEW

SOURCE/TOPIC	DOCUMENT TITLE
AOC Updates	<p>Africa Oil Corp Presentation September 2020</p> <p>Africa Oil Report to Shareholders September 2020</p> <p>AOC ESG Strategy Update 16 September 2020</p> <p>AOC – Kenya Update 26 October 2020</p> <p>ESAP REQUIREMENTS updates October 2020</p>
	<p>Africa Oil Climate Action Project Presentation June 2020</p> <p>Walnut - Shadow Carbon Price Method 290720</p> <p>Shadow Carbon Price Note 270720</p>
AOC Systems, Policies and Standards of Operation	<p>2020-10-15 AOI - ESMS Framework final</p> <p>AOI - Environmental Policy</p> <p>AOI - GHG Emissions Management Policy</p> <p>AOI - Health &amp; Safety Policy</p> <p>AOI - Human Rights Policy</p> <p>AOI - Stakeholder Engagement &amp; Community Relations Policy</p> <p>AOI - Sustainability Policy</p> <p>AOI Procedure - ESG Due Diligence 140820 final</p> <p>AOI Standard of Operation - CHSS - 210820 final</p> <p>AOI Standard of Operation - ERP - 210820 final</p> <p>AOI Standard of Operation - Perf Monitoring - 210820 final</p> <p>AOI Standard of Operation - Reporting of Incidents - 210820 final</p> <p>AOI Standard of Operation - SEP - 210820 final</p> <p>AOI Standard of Operation - OHS - 190820 final</p>
Kenya: South Lokichar Upstream and LLCOP Midstream Projects and Block 12A Complaint	<p>Kenya ESIA Non-Technical Summary Draft June 2020</p> <p>ESIA A2 Tullow Kenya BV June 2020</p> <p>Draft Upstream Land Access Strategy. IFC Comments Revised</p> <p>LLCOP PipeCo RLRf draft 020720. IFC Comments Revised</p> <p>CAO Assessment Report Delonex_Africa Oil 01. October 2020</p>
Nigeria Assets	<p>AOC Prime ESG Management</p> <p>3Q and 9M 2020 Shareholder's Report. POG 4 November 2020</p> <p>Q2 2020 Shareholders' Report POG 7 August 2020</p> <p>Prime HSES Reporting 030820 Spreadsheet</p> <p>Prime ESG reporting - record of call 210720</p> <p>Agbami Unit Monthly Report Final May 2020</p> <p>OML130 Monthly Report Key HSE Statistics May 2020</p>

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