

Environmental and Social Action Plan – ESAP

Kenya: Africa Oil #36699

Task Title/Description	Anticipated Completion Date	Indicator of Completion
The Company will enhance HSE capacity through i) an IFC PSs focused training for senior management and operational teams; and (ii) hiring an Environmental, Social and Governance Manager.	12/31/2015	(i) Contract with consulting firm delivering training (ii) Name of appointed person
The Company will develop a Stakeholder Engagement Plans (SEP), for its Kenya and Ethiopia activities per the requirements of PS1.	3/31/2016	Deliver of SEP
The Company will complete the additional requirements for Free Prior Informed Consent (FPIC), per the circumstances listed in PS7, and complete a mutually acceptable process between Company and affected community and provide evidence of an agreement between the two parties on the outcome of the negotiation	3/31/2016	Provide evidence of an agreement between the two parties on the outcome of the negotiation (at each occurrence)
The Company will develop an overarching human resource policy (HR) for Kenya and Ethiopia, which will make reference to PS2 and ILO conventions, and will include associated country specific implementation procedures, (ii) The Company will develop a Retrenchment Framework Plan that aligns with the requirements of PS2 and that should be utilized in cases of collective dismissal by the Company and/or contractor/subcontractor, and (iii)The Company will develop and implement a formal internal grievance mechanism applicable to all employees and	The Company will enhance HSE capacity through i) an IFC PSs focused training for senior management and operational teams; and (ii) hiring an Environmental, Social and Governance Manager.	(i) Deliver the HR policy; (ii) Resettlement Framework, and (iii) Grievance mechanism

workers employed at Company's sites by contractors and sub-contractors.		
The Company will prepare a security risk assessment and develop Security Management Plans that are aligned with PS 4. These will be reviewed and updated as the project evolves.	3/31/2016	Deliver the security risk assessment and security management plans. Provide the name of the security manager
The Company will develop Land Acquisition and Livelihood Restoration Plans (LALRP) for each of the two countries (Kenya, Ethiopia).	3/31/2016	Copy of LALRP
The Company will redesign its compensation plan in Ethiopia to incorporate procedures to compensate prior to commencing work, vacating land and any potential damage that could occurred after seismic survey.	7/31/2015	Management of Change for Ethiopia Compensation
The Company will develop a biodiversity strategy for Kenya as described in the ESRS, and (ii) The company will develop a similar plan prior to any substantive work related to development of successful wells in Ethiopia.	3/31/2016	The company develops Biodiversity Strategies for Kenya and Ethiopia to be approved by IFC
The Company will prepare and submit ESIA's to IFC addressing local regulatory requirements and IFC PSs in any case where wells progress to production. These will be presented to IFC for review and approval at least four months prior to start of any substantive construction.	10/31/2016	ESIA approved by IFC

Provide evidence of an agreement between Company and community on the outcome of FPIC negotiations	6/30/2016	Provide evidence of an agreement between the two parties on the outcome of the negotiation (at each occurrence)
The Company will develop a biodiversity strategy specific to the Turkana upstream area and which will be updated as further ESIA's are completed for upstream, midstream and downstream areas	6/30/2017	Provide strategy to be approved by IFC