

Environment & Social Action Plan South Asia Petroleum Limited

The BORROWER commits to the actions as specified below, within the specified deadlines, and declares that the resources specified below have been allocated

<u>Issue</u>	<u>Proposed Actions</u> (Mitigation, Management, Monitoring, and Institute Methods)	<u>Target Completion Date</u>
Social and Environmental Assessment and Management System	Finalize and disclose the ESIA for the Egyptian site, and ensure that the ESIA meets both local regulatory requirements and IFC E&S policies and guidelines.	Prior to the first disbursement
	Establish an independent EHS department at the Indian site, reporting to the plant manager.	By June 30, 2008
	Set up an effective corporate EHS management system in accordance with the requirements of the IFC Performance Standards	By December 31, 2008
	Set up a formal community grievance mechanism at the Indian site	By June 30, 2008
	Prepare a labor camp management plan to minimize the OHS, social, cultural, and environmental risks during the construction phase at Indian site	Prior to commitment
	Public consultations at Egypt site	First – prior to the Board approval Second – prior to major construction
	Disclosure annual E&S performance reports on the SAPL website	On-going
Labor and Working Conditions	Ensure that the HR management at its proposed Egyptian operation meets both local regulatory and IFC policy requirements	On-going
	Review the personal protection equipment procedures at the Indian site for all positions and enforce the procedures strictly	By March 31, 2008
	Monitor the E. coli in the drinking water for the Indian operations	By March 31, 2008
Pollution Prevention and Abatement	Conduct hazard operability (HAZOP) studies	Indian site – by December 31, 2008 Egyptian site – during detailed design
	Conduct a comprehensive energy efficiency audit at its Indian site as a mitigation method to increase energy efficiency and reduce GHG emission	By December 31, 2008
Cultural Heritage	Prepare a Chance Finds Procedure of potential buried antiquities for the construction works of the Egyptian site.	Prior to commitment