

## Corrective Action Plan Toreador

Toreador 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>	<u>Target Completion Date</u>
Environmental and Social Assessment and Management Systems	<p>At the Corporate Level:</p> <ul style="list-style-type: none"> <li>• Develop an Integrated Environment, Health, Safety and Social (EHSS) Management System taking into consideration IFC's Performance Standards. The (EHSS) will include a Corporate Public Consultation and Disclosure Plan.</li> </ul> <p>At the country level:</p> <ul style="list-style-type: none"> <li>• Conduct gap analysis between current E&amp;S legislation and IFC's Performance Standards and Disclosure Policy.</li> <li>• Develop a country-specific EHSS for Turkey and Romania building on existing documentation, processes and procedures, and taking into consideration IFC's Performance Standards and Disclosure Policy.</li> <li>• For Turkey, the system should demonstrate how Toreador will ensure compliance with IFC Performance Standards once operations will be handed over to TPAO.</li> </ul>	<ul style="list-style-type: none"> <li>• May 2007</li> </ul>
Human resources	<p>Hire an E&amp;S Manager at corporate level with decision making authority.</p> <p>Appoint an E&amp;S manager at country level to manage social, environmental, health and safety, and community relations issues in Turkey and Romania. The manager should also be responsible for interactions with the respective government regulatory agencies in the two countries.</p>	<ul style="list-style-type: none"> <li>• February 2007</li> </ul>
Land Acquisition and Resettlement Framework	<p>Develop a Land Acquisition and Resettlement plan for future Toreador operations in Turkey and Romania. A gap analysis should be conducted between current legislation and IFC Performance Standards, and the Land Acquisition and Resettlement Plan should be based on the incorporation of IFC Performance Standard 5.</p> <p>Undertake land acquisition according to the Project's Resettlement Action Plan Framework, and prepare as necessary any detailed Land Acquisition and Resettlement Action Plan for any future land acquisition.</p>	<ul style="list-style-type: none"> <li>• May 2007</li> </ul>
Community Development Plan	<p>Prepare detailed Community Development Plan (CDP) with local communities, local authorities and other stakeholders. Implement CDP projects.</p>	<ul style="list-style-type: none"> <li>• April 2007</li> </ul>

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Community Engagement- Public Consultation and Disclosure	Develop and implement a Public Consultation and Disclosure plan for the construction, operations and closure phases of projects. The plan will include a grievance mechanism. The Public Consultation and Disclosure Plan should be utilized by Treador's contractors and Treador will assume responsibility for ensuring contractors' compliance.	<ul style="list-style-type: none"> <li>• May 2007</li> </ul>
Archeology and cultural resources	Develop and implement an Archeological Resource Plan in accordance with national legislation and taking into consideration IFC Performance Standard 8. Include a chance find procedure for project construction and operation phases.	<ul style="list-style-type: none"> <li>• May 2007</li> </ul>
Impacts on fishing activities in Turkey	Consult with local fishermen and develop a plan for conducting seismic activities that minimizes impact on local fishermen's operations and fish breeding season.	<ul style="list-style-type: none"> <li>• Throughout project execution</li> </ul>

Approved on October 30, 2006

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