

ARICOM #25914 - FINAL ENVIRONMENT AND SOCIAL ACTION PLAN (REVISED)

#	Action	Entity Responsible	Deadline
1	Submit Public Consultation and Disclosure Strategy (PCDS) prepared by suitable qualified professional acceptable to IFC to reflect compliance with IFC Performance Standards and consultation to date at Kuranakh	Aricom Moscow	Prior to IFC Board approval
2	Submit draft of HR policies and Labor and Training Plan to IFC for review	Aricom Moscow	Prior to IFC Board approval
3	Aricom to hire an experienced HSEC consultant to be commuting between London, Moscow and Blagoveschensk to manage cultural change and oversee environmental and social management for each operation	Aricom with Peter Hambro plc and PHMC input	Maximum 6 month after IFC investment signing
4	Submit draft concept note on HSEC management for Kuranakh to IFC review including a final list of environmental management plans to be developed	Aricom Moscow	Maximum 3 month after IFC investment signing
5	Provide copies of all Government permitting, consents and clearance documents required to establish and operate the Kuranakh and K&S project	Olekminskiy Rudnik + Kimkano-Sutarsky Kombinat/ Aricom Moscow	Available information before Board approval and thereafter an update every 3 month
6	Submit full set of Environmental Management Plans to IFC for Kuranakh and K&S to meet IFC Performance Standards requirements to IFC review	Olekminskiy Rudnik + Kimkano-Sutarsky Kombinat/ Aricom Moscow	30 days before mine commissioning
7	Provide copy of Environmental Approval of OVOS for Kuranakh and K&S issued by Amur Administration under the Regulation on Environmental Impact Assessment, 2000 recently revised in its procedural aspects	Olekminskiy Rudnik + Kimkano-Sutarsky Kombinat	Before mine commissioning
8	Develop with support from qualified professional a comprehensive HSMS for Kuranakh along with a mutually acceptable time frame for implementation	Aricom Moscow	30 days before mine commissioning
9	Submit draft Emergency Preparedness and Response Plan to IFC for review	Aricom Moscow	30 days before mine commissioning
10	Develop with support from qualified professional a comprehensive corporate ESMS along with a mutually acceptable time frame for implementation, including allocation of adequate E&S staff and resource for implementation	Aricom plc	Maximum 12 month after IFC Board approval
11	Carry out annually independent audits of Aricom assets including review of EIA commitments and management plans implementation as well as compliance with Russian and IFC requirements The first audit will include a gap analysis on the ESMS	Aricom plc/ Aricom Moscow	Each year once mines are operational
12	Carry out a detailed socioeconomic baseline study for the K&S deposit and subsequently develop a Resettlement Action Plan (RAP) for the Snarsk village in compliance with Russian and IFC requirements	Kimkano-Sutarsky Kombinat / Aricom Moscow	Maximum 8 month after IFC Board approval