

**AFRICO - KALUKUNDI PROJECT #26209 - ENVIRONMENT AND SOCIAL ACTION PLAN**

#	Action	Entity Responsible	Deadline
1	Request detailed proposals from suitably experienced independent HSEC consultants to complete ESIA rewrite and assist Africo's Environmental Manager in capacity building as required prior to start up	Africo with IFC input	Immediate
2	Collect additional socio-economic baseline data for artisanal miners residing in Kisankala village	Africo / Synergy Consultants	Prior to Equity Disclosure
3	Identify vulnerable groups amongst project affected persons for further investigation during the Debt Phase ESIA update	Africo / Synergy Consultants	Prior to Equity Disclosure
4	Prepare Interim RAP for Kisankala Village to PSS standard	Africo / Synergy Consultants	Prior to Equity Disclosure
5	Complete and document a full round of local disclosure and consultation	Africo / Consultants	Prior to Equity Disclosure
6	Re-write existing Environmental Adjustment Plan as IFC Performance Standard compliant ESIA to address Gap Analysis	Africo with Consultants (to be identified)	Prior to Debt Finance Disclosure
7	Undertake and document Alternatives Analysis with respect to key technologies and infrastructure design and layout for potential environmental and social impacts.	Africo / Consultants	Prior to Debt Finance Disclosure
8	Undertake and document Cumulative Impact Assessment with respect to surrounding properties	Africo / Consultants	Prior to Debt Finance Disclosure
9	Prepare Final RAP for Kisankala Village to PSS standard	Africo / Synergy Consultants	Prior to Debt Finance Disclosure
10	Develop draft of HR policies and Labor and Training Plan	Africo	Prior to Debt Finance Disclosure
11	Develop draft Emergency Preparedness and Response Plan (that also includes the Construction period)	Africo	Prior to Debt Finance Disclosure
12	Commission Tailings Dam Independent Review of Design, Construction (and ongoing maintenance and monitoring)	Independent Geo-Technical Specialist	Prior to Finalisation of Dam Design
13	Expand existing Sustainable Development Plan to cover community development, community health, local employment strategy and revenue management	Africo / Synergy / IFC Advisory Services	Prior to debt Finance Disclosure
14	Develop with support from qualified professional a comprehensive EHSMS along with a mutually acceptable time frame for implementation	Africo / Consultants	Framework Document in Revised ESIA, full implementation within 12 months of mine commissioning
15	Carry out regular independent monitoring of Africo assets including review of ESIA commitments and management plans implementation as well as compliance with DRC and IFC requirements	Africo	Resettlement monitoring frequency: every 4 months for initial 2 years of village relocation implementation; thereafter annually for three years. Environmental monitoring: annual

Note: Documents all for submission to IFC for review