

Environment & Social Action Plan Vostok Energy

The Company 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	Hire external consultants to conduct an environmental and social impact assessment (ESIA) for the proposed gas treatment plant according to both Russian regulatory requirements and IFC's Performance Standards (PS). The ESIA will be sent for IFC review and approval.	Three months prior to construction start
	Develop a Public Consultation and Disclosure Plan (PCDP) that will describe procedures for informing nearby affected communities about the impacts of the project and consulting with them on mitigation measures and project development	March 31, 2008
	Establish a comprehensive grievance mechanism to receive and facilitate resolution of the affected communities' concerns and grievances about environmental and social performance.	March 31, 2008
	Develop Community Development Plan (CDP) that will describe the procedures for planning, implementing and reporting on, monitoring and evaluating Vostok's social investment in the areas of its operations	March 31, 2008
Labor and Working Conditions	Include sulfur dioxide and noise measurements in its workplace monitoring program	On-going
Pollution Prevention and Abatement	Include sulfur dioxide and noise measurements in the ambient environment monitoring program	On-going
	Survey oil contamination of the soil at and near the company's drilling pads, and set up the database for soil quality baseline and on-going monitoring	• First survey and database setup – by June 30, 2008 • Database update – once per year
Community Health, Safety and Security	Provide necessary emergency response (ER) training for the local communities and conduct joint ER drills together with local communities and the Blowout Prevention Team/Gas Safety Team.	On-going

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	Take additional methods for well management near the proposed reservoir to prevent polluting the water, including fugitive dust control and additional berm to prevent spill runoff.	On-going
	Establish a two-way communication system with the local communities for receiving inquiries on HSE concerns and alerting on potential emissions exceedences and procedure for addressing such concerns	March 31, 2008
Biodiversity Conservation and Sustainable Natural Resource Management	Submit habitat preservation research report, prepared by Ecology and Evolution Institute of Russian Academy of Science (EEIRAS), for IFC review.	December 31, 2007
	Establish the monitoring database by types and headcount of rare species based on the report by EEIRAS	March 31, 2008
	Include recommendations by EEIRAS for minimizing the impacts on natural habitat in project design and correct any practices that may impact the habitats	On-going
Cultural Heritage	Include recommendations of the archaeological research institute into project design and pipelines routing	March 31, 2008
	Establish chance find procedure for cultural and historical artifacts and ensure construction contractors' compliance with the procedure	On-going