

GRYPHON**ENVIRONMENTAL AND SOCIAL ACTION PLAN**

May 18, 2009

#	Action Description	Indicator of Completion	Timeframe
1	Sustainability Organization and Management a) Finalize the draft Health, Safety, Environment and Community (HSEC) Policy documentation with commitments appropriate to the level of activities, including a commitment to undertake a Soils and Land Capability Survey and prepare a Land Use Plan that will inform the Feasibility Study. b) Finalize the draft Human Resources Policy (that also covers management of contractors and sub-contractors) in line with PS2. c) Disclose key HSEC/Labor documents on Gryphon's website after they are reviewed and agreed with by IFC. d) Develop Emergency Preparedness and Response Plan.	HSEC Policy and Human Resources Policy reviewed and approved by IFC Disclosure of HSEC and HR Policies on the Company Website	Within 3 months of subscription
2	Social Impact Assessment Hire a consultant with relevant experience to help Gryphon undertake a rapid socio-economic assessment and impact assessment of temporary economic displacement on the owners of agricultural land and on other affected parties that is resulting from exploration activities and develop an impact mitigation strategy targeting those impacted people.	Consultant Terms of Reference developed jointly with IFC and consultant selection process initiated Signed consultant contract Social Impact Management Plan reviewed and approved by IFC	Prior to commitment Within 1 month of subscription Within 4 months of subscription

ENVIRONMENTAL AND SOCIAL ACTION PLAN

3	Stakeholder Engagement Plan a) Document existing and planned community engagement activities in a Stakeholder Engagement Plan (SEP) with policies and procedures for engagement with all stakeholders (including communities affected by land acquisition or temporary economic displacement, artisanal miners, new migrants, communities indirectly affected beyond the project footprint, NGOs, governmental agencies, interested groups, influential parties, etc.) following IFC's publication <u>Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (May 2007)</u>. The SEP is to be reviewed and approved by IFC before being disclosed publicly. b) <u>Grievance Mechanism</u>: As part of the SEP, prepare a grievance mechanism for the local communities that will be disclosed publicly. c) <u>Community Reporting</u>: As part of the SEP, provide regular (at a minimum annual) feedback to local stakeholders on the implementation of agreed environmental and social mitigation measures related to impacts that could affect them.	Stakeholder Engagement Plan reviewed and approved by IFC Document community reporting activities in the Annual Monitoring Report	Within 1 month of subscription. On ongoing basis
4	Monitoring Carry out regular monitoring of Gryphon assets and HSEC Policy implementation as well as compliance with Burkina Faso and IFC Performance Standards requirements.	Submit Annual Monitoring Report to IFC (format to be provided by IFC)	Annual
5	Incident Reporting Initiate formalized OHS and environmental incident reporting	OHS and incident reporting in the Annual Monitoring Report	Immediate
6	SEIA Preparation Complete and disclose (in accordance with IFC's disclosure policy) for a minimum period of 60 days a detailed SEIA prior to any substantive mine construction or development. The SEIA must include a Cumulative Impacts Assessment.	SEIA submitted to IFC for review and approval prior to being publically disclosed	Prior to start of mine construction.
7	Voluntary Principles on Security and Human Rights Design and conduct training for Management and Gryphon Security personnel to ensure that the principles and procedures for compliance with the Voluntary Principles on Security and Human Rights are in place and understood.	Training Plan and reporting on implementation	Within 3 months of subscription