

July 20 2009
ContourGlobal Togo SA

SUPPLEMENTAL ENVIRONMENTAL AND SOCIAL ACTION PLAN (SESAP)

CG Togo developed the environmental and social action programs for the project :

- ContourGlobal, Environmental and Social Assessment of a Dual Fuel 100 MW Power Plant in Lomé, Togo, Exhibit 6: Environmental Management Plan, May 2009
- ContourGlobal, Phase II Soil & Groundwater Investigation and Proposed Management Plan, Centrale Thermique de Lomé (Lomé Thermal Power Plant), Lomé, Togo, October 2008
- ContourGlobal, OHS Management System, Construction Phase, Centrale Thermique de Lomé, Togo

This SESAP was prepared to identify additional actions for the project to comply with IFC Performance Standards on Social and Environmental Sustainability.

ACTION	DELIVERABLE	DEADLINE
LABOR AND WORKING CONDITIONS		
1. CG to develop a Human Resource policy by addressing the following areas in line with IFC Performance Standards and host country laws and regulations: (i) the recruitment process; (ii) wages; (iii) promotions; (iv) freedom of association; (v) grievance mechanism, and (vi) conditions of employment. The client will document and communicate the terms of the HR policy to all workers contracted by the CG. 2. CG to hire or assign responsibility to an employee to manage human resources.	• Provide IFC with an updated HR policy addressing these sections.	• Condition of first disbursement.
COMMUNITY HEALTH AND SAFETY		
3. The farmers adjacent to the site must be advised of the wells contamination from hydrocarbons and PCB. Signage should be posted near the wells to indicate they should not be used for drinking purposes. CG to finalize and implement the groundwater monitoring program.	• Provide IFC with evidence of signage or communication to farmers in coordination with the Togolese authorities, finalized groundwater monitoring program.	• Prior to IFC's board date.
LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT		
4. CG to engage, in coordination with the Port Authority, with the affected vendors that will be economically displaced to ensure that they do not incur any economic loss in the event CG proceed with the construction of the second gate.	• Provide IFC with documentary evidence of the engagement and consultation process as well as outcome of the negotiation.	• Prior to start of construction of the second gate.