

March 31, 2009

## Environmental and Social Action Plan Laraib Energy Limited

The following are the actions that Laraib Energy Limited is planning to implement in accordance with the recommendations by the environmental and social assessment report (2009 Initial Environmental Examination) and in line with IFC Performance Standards on Social and Environmental Sustainability (April 30, 2006).

| PS     | Action                                                                                                                                                                                                | To be verified by:                                                                                                                                      | Timeline                                                                                                                                                                          |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PS1    | Appointment of Environmental Social Occupational Health and Safety (ESOHS) Manager                                                                                                                    | LEL's organizational chart showing ESOHS Manager and CV of the appointed ESOHS Manager                                                                  | Before first disbursement by IFC                                                                                                                                                  |
| PS1    | Establishment of Environmental Management System                                                                                                                                                      | Copies of corporate policies, procedures, organizational chart, annual budget for mitigation measures.                                                  | Before first disbursement by IFC                                                                                                                                                  |
| PS1    | Formulation of corporate environmental policy                                                                                                                                                         | A copy of the finalized corporate environmental policy signed by LEL's management.                                                                      | Before first disbursement by IFC                                                                                                                                                  |
| PS1, 3 | Implementation of Environmental Management Plan (management arrangement, mitigation measures, monitoring program) proposed in Section 6 of 2009 IEE                                                   | Updated Environmental Management Plan incorporating detailed arrangements by EPC Contractor / O&M Contractor                                            | Construction phase: Before start of construction.<br>Operational phase: Before start of operation.                                                                                |
| PS1    | Provision of ESOHS training to LEL staff, EPC workers and O&M workers                                                                                                                                 | Monitoring reports summarizing trainings provided                                                                                                       | Construction phase: Before start of construction and on an ongoing basis until construction is complete.<br>Operational phase: Before start of operation and on an ongoing basis. |
| PS2    | Ensure that the construction labor camp has appropriate and adequate accommodations, health and sanitation facilities, cooking and recreation facilities and security for the construction workforce. | A copy of the EPC Contractor's design document                                                                                                          | Before start of construction.                                                                                                                                                     |
| PS2    | Ensure standards for labor health and safety (construction and operational phases) are consistent with IFC's Environmental, Health and Safety General Guidelines                                      | Provisions of EPC and O&M contracts that reference international industry best practice with regard to construction and O&M working conditions and OHS. | EPC contract: before start of construction.<br><br>O&M contract: before start of operations                                                                                       |
| PS2    | Adoption of the Occupational Health and Safety standards of HUBCO                                                                                                                                     | Certification of the Project's operations with OHSAS or equivalent.                                                                                     | By the end of the first year of Project operations                                                                                                                                |
| PS4    | Preparation of Contingency                                                                                                                                                                            | Copies of the Contingency                                                                                                                               | Construction phase: Before                                                                                                                                                        |

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|     | Plans for construction and operational phase                           | Plans                                                                                                                                                             | start of construction.<br>Operational phase: Before start of operation. |
| PS5 | Implementation of the Project's Resettlement and Entitlement Framework | Updated draft Framework with details of affected individuals/families, and rate and schedule of compensation payments and/or livelihood restoration arrangements. | Before start of construction.                                           |