

Environmental and Social Action Plan (ESAP)
African Eagle Resources
November 06, 2011

African Eagle commits to the actions as specified below, within the specified deadlines, and declares that the resources required to implement the action plan will be allocated.

No.	Action Description	Indicator of Completion	Timeframe
PS 1: Social and Environmental Assessment and Management System			
1	Environmental and Social Baseline Studies <ol style="list-style-type: none"> Submit Scope of Work for the proposed baseline environmental and social studies as part of ESIA development consistent with the Performance Standards to IFC for review and comment prior to commencement of the studies. Develop a detailed baseline study document addressing local regulatory requirements and IFC Performance Standards. The baseline study will have appropriate environmental and social baseline data describing relevant existing physical, biological, socioeconomic and labor conditions. 	<p>Scope of Work submitted to IFC for review and approval</p> <p>Draft baseline report submitted to IFC for review and approval prior to issuance of final report</p>	<p>In advance of commencement of studies</p> <p>Upon completion of the draft report and prior to the development of the ESIA</p>
2	Environmental and Social Impact Assessment <ol style="list-style-type: none"> Develop a detailed ESIA document consistent with local regulatory requirements and IFC Performance Standards in parallel with the feasibility studies prior to any substantive mine construction. The completed ESIA will be made available to the public online, at the African Eagle's office in Tanzania and at suitable locations in the local communities. The conclusions and recommendations of the draft ESIA will be discussed with local communities to seek feedback and their views on issues that affect them and incorporate into the mitigation plans as necessary. 	<p>ESIA documents submitted to IFC for review and approval prior to issuance of final document and public disclosure</p>	<p>Four months prior to start of construction</p>
3	Stakeholder Engagement Framework and Plan <ol style="list-style-type: none"> Develop a Stakeholder Engagement Framework (SEF) that describes the Company's policies and procedures for consultation with all the relevant stakeholders and affected communities and disclosure of information, Tanzanian regulatory requirements and the Performance Standards, process for identifying stakeholders, strategy, schedule for sharing information, a grievance mechanism and roles and responsibilities. Prepare a detailed Stakeholder Engagement Plan (SEP) documenting all engagement activities to date, proposed engagement schedule aligned with the project's various stages, a detailed list of stakeholders, a process for engaging the communities during the ESIA, a schedule of disclosure of information, a process 	<p>SEP is provided and agreed with IFC prior to disclosure.</p> <p>Disclosure of the grievance mechanism in project affected communities and provision of training in its</p>	<p>Condition of Disbursement</p> <p>Within six (06) months of subscription</p>

	<p>for receiving, documenting and addressing feedback and a system for documenting engagement sessions, feedback received. The SEP will also include a grievance procedure for the local communities, which will be disclosed publicly.</p> <p>Both documents will be consistent with “<i>Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets</i>”, IFC, 2007; “<i>Addressing Grievances from Project Affected Communities: Guidance for Projects and Companies on Designing Grievance Mechanisms</i>”, IFC, 2009.</p> <p>c. African Eagle will hire a community liaison officer responsible for community engagement, compensation and managing community aspects; and will provide regular (at a minimum annual) feedback to local stakeholders on the implementation of agreed environmental and social mitigation measures related to issues that directly affect them.</p>	<p>use.</p> <p>Position will be shown in the SEP and community reporting activities will be documented.</p>	<p>Within six (06) months of subscription</p>
4	<p>Influx Management Plan</p> <p>a. Assess the probability of the occurrence of project-induced in-migration through a scoping exercise (as part of the baseline studies) – characteristics of the project, existence of a mobile population and capacity of the area to meet project needs. This scoping exercise will assess the probability of in-migration and feed into the development of the detailed Influx Management Plan (IMP). Refer to IFC Publication “<i>Project and People: A handbook for addressing project-induced in-migration</i>, IFC, 2009.</p> <p>b. Develop an influx management plan for assessing and mitigating environmental, health, safety and security impacts from potential project-induced in-migration in the surrounding communities. The plan will describe project specific approaches and mitigation measures for project-induced in-migration.</p>	<p>Submit Scoping exercise as part of baseline studies</p> <p>IMP provided and agreed with IFC</p>	<p>Same as baseline study submission</p> <p>Same as ESIA submission</p>
5	<p>Artisanal Miners</p> <p>a. Assess potential impacts the proposed nickel mine development may have on artisanal miners in the project area as part of the ESIA.</p> <p>b. African Eagle will consult with the relevant authorities with regards to the presence of artisanal miners. If there is any need for the artisanal miners to vacate areas needed for project activities, this process will be implemented through negotiation and consultation, agreed with the authorities, and will include identification of any areas that might require mitigation measures.</p>	<p>Report describing the activities, potential impacts and proposed mitigation measures.</p>	<p>Same as ESIA submission</p>
6	<p>Monitoring</p> <p>a. AFE will monitor the implementation of its exploration phase ESMP prepared as part of the preliminary environmental assessment for Ngasamo. AFE will also ensure implementation of the HSES Policy is consistent with the</p>	<p>Document status and progress in annual report</p>	<p>Within twelve (12) months of subscription</p>

	<p>Tanzanian regulations and IFC Performance Standards.</p> <p>b. AFE will implement an environmental monitoring program for surface water hydrology and groundwater which will include both quality and water level fluctuations and document results in an annual report.</p>	Provide annual report	Immediately
PS 2 Labor and Working Conditions			
7	<p>Human Resources Policy</p> <p>a. African Eagle will review its Human Resources policies to ensure consistency with the requirements of PS 2; disclose the policies on its website; conduct internal training for its employees to raise awareness on the HR policy including the grievance mechanism; and provide a copy of the HR policy to all its employees in the corporate office in Mwanza and on site at Dutwa.</p> <p>b. African Eagle will also prepare an employment strategy appropriate to the proposed increased level of activity including plans regarding hiring of new staff.</p>	Provide IFC with a copy of the updated HR Policy for review and approval, training schedule, implementation and completion report	<p>Within six (06) months of subscription</p> <p>At time of Bankable Feasibility Study</p>
8	<p>Worker/Community Health Program</p> <p>a. Develop awareness and prevention programs appropriate to its level of activities for malaria, HIV/AIDS and any other prevalent diseases.</p> <p>b. Review its existing HR policy to include provisions on employee rights and responsibilities; employee privacy and confidentiality of HIV/AIDS status; and non-discrimination against employees with real or perceived infection and no requirements for compulsory HIV/AIDS screenings of job applicants or those employed.</p>	<p>Provide details of program</p> <p>Submit to IFC copy of the revised policy for review and approval</p>	<p>Within twelve (12) months of subscription</p> <p>Within Six (06) months of subscription</p>
9	<p>Incident Reporting</p> <p>a. Initiate formalized Occupational Health and Safety and environmental incident reporting.</p>	OHS and incident reporting	Immediately
PS 3 Pollution Prevention & Abatement			
10	<p>Solid Waste Management</p> <p>a. AFE will follow adopt environmentally sound waste disposal practices by segregating the waste and burying non-hazardous waste in pits, compacting the material and covering with soil.</p>	Photographic evidence	Once the exploration camp becomes operational
11	Secondary Containment	Photographic evidence	Immediately

	a. AFE will equip all existing fuel and oil tanks with secondary containments to hold 110% of the tank capacity, and ensure all newly installed tanks are equipped with secondary containment at the time of installation.		
PS 4 Community Health, Safety & Security			
12	Community Safety a. AFE will organize information campaigns on road safety and emergency response and preparedness to directly affected community.	Report describing the campaign and schedule of information sessions	Within twelve (12) months of subscription
13	Defensive Driving a. AFE will provide defensive driver training to its workers and will ensure that their Contractors follow similar requirements.	Provide details of training program	Start process to initiate training immediately
PS 5 Land Acquisition and Involuntary Resettlement			
14	Compensation Framework for Economic Displacement a. Develop a Compensation Framework that outlines the principles, guidelines and approaches that will be followed for compensation during exploration and future development stages.	Provide IFC with a copy of the Compensation Framework review and approval prior to disclosure	Within six (06) months of subscription