KASBAH RESOURCES LIMITED
ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)

ACTION	DELIVERABLE	DEADLINE
INTEGRATED MANAGEMENT SYSTEM		
1. **Sustainability Organization and Management** Kasbah Resources Limited will: a. Revise existing E&S Policy to include a commitment to meet IFC Performance Standards. b. Develop Health, Safety, Environment and Community (HSEC) Policy documentation with commitments appropriate to the level of activities. c. Disclose HSEC Policy on Kasbah Resources Limited's website after review and acceptance by IFC.	• Provide IFC with a copy of the revised E&S Policy as well as the HSEC Policy.	Prior to subscription.
2. **Stakeholder Engagement Plan** Kasbah Resources Limited will as part of its community engagement requirement develop a Stakeholder Engagement Plan (SEP) for public disclosure with the following content: a. Documentation of existing and planned community engagement with all stakeholders (i.e. communities potentially affected by land acquisition, new migrants, communities indirectly affected beyond the project footprint, NGOs, governmental agencies, interested groups, influential parties, etc) following Stakeholder Engagement: *A Good Practice Handbook for Companies Doing Business in Emerging Markets (May 2007)*. The SEP will be disclosed publicly as well as be available in a abbreviated version in Arabic and French language to all parties with relevant information. The SEP will include a description of the principles and procedures of	• Provide SEP to IFC for review, approval and public disclosure.	Within three (3) months of subscription

good faith negotiations for land use and compensation. b. Grievance Mechanism. c. Framework for Community Reporting: 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.	• Document community reporting activities in the Annual Monitoring Report.	Ongoing basis.
3. **Social and Environmental Impact Assessment Preparation** Kasbah Resources Limited will 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 prior to disclosure.	Sixty (60) days prior to start of construction.
LABOR AND WORKING CONDITIONS		
4. Kasbah Resources Limited will strengthen its Human Resources (HR) policy by addressing the following areas in line with IFC Performance Standards and host country laws and regulations: a. Articulate a HR policy, Document recruitment process; promotion procedure; freedom of association; and formalized grievance mechanism. b. Integrate the various elements of its HR policy into one document to be made available to staff.	• Provide IFC with an updated HR policy addressing these sections.	Within three months (3) of subscription.