

**Nyota Minerals: Tulu Kapi Gold Prospect
Environmental and Social Action Plan
April 2010**

No.	Action Description	Indicator of Completion	Timeframe
PS 1: Social and Environmental Assessment and Management System			
1	Sustainability Organization and Management a. Develop and implement a Health, Safety, Environment and Community (HSEC) Policy and Procedures ("HSEC Policy") document that is consistent with the requirements of the IFC Performance Standards and Ethiopian legislation, appropriate to the level of activities. b. Disclose HSEC Policy on Nyota's website after review and agreement by IFC.	Provide IFC with a copy of HSEC Policy for review and approval Disclosure of HSEC Policy on Company Website	Within one month of subscription Within two weeks of IFC's approval of the HSEC Policy
2	Emergency Preparedness and Response Plan (ERP) a. Develop and implement Emergency Preparedness and Response Plan. The plan will include provisions for community emergency preparedness and response b. Provide training to Nyota staff, contractors and communities on emergency preparedness and response	Submit copy of the ERP to IFC for review and approval Submit to IFC a schedule of training program and completion report.	Within three months of subscription
3	Social and Environmental Impact Assessment study (SEIA)		

	Complete, consult and disclose in accordance with IFC's disclosure policy detailed SEIA documents prior to any substantive mine construction or development. The SEA must include a cumulative impacts assessment and resettlement plan. At a minimum, the documents must be disclosed to project affected communities, be available to the public at the Nyota office in Ethiopia, and be available online.	SEIA documents submitted to IFC for review and approval prior to public disclosure	Submission to IFC minimum of 90 days prior to commencement of mine construction
4	Stakeholder Engagement 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, 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>. b. The SEP will include a grievance mechanism for the local communities that will be disclosed publicly. c. Nyota will hire a community liaison officer responsible for community engagement, compensation and managing community aspects d. As part of the SEP, Nyota will provide regular (at a	Submit SEP to IFC for review and approval by IFC prior to public disclosure Disclosure of the grievance mechanism in project affected communities and provision of training in its use. Position will be shown in the SEP. Document community reporting activities with a summary of outcomes in the Annual	Within three months of subscription Within 15 days after acceptance of the SEP by IFC Within three months of subscription (ie: prior to public disclosure of SEP) Ongoing

	minimum annual) feedback to local stakeholders on the implementation of agreed environmental and social mitigation measures related to impacts that could affect them.	Monitoring Report	
PS 2 Labor and Working Conditions			
5	Human Resources Policy		
	a. Nyota will update its Human Resources policy to become consistent with the requirements of PS 2 and disclose it on its website b. Nyota will conduct internal training for its employees to raise awareness on the HR Policy and the grievance mechanism (its use and applicability) c. Nyota will provide a copy of the HR policy to all its employees both in the corporate office in Addis Ababa and the site office at Tulu Kapi. d. Nyota to prepare guidance on influx management (appropriate to level of activities) including the relocation of hiring of new staff to an off-site location.	Provide IFC with a copy of the updated for review and approval Provide IFC with a schedule for training sessions Provide IFC with a copy of a completion report Provide IFC with progress update	Within three months of subscription Within one month after completion IFC's approval Within one month after IFC's approval of training schedule Within three months of subscription
6	Occupational Health and Safety		
	a. Nyota will develop detailed Occupational Health and Safety (OHS) procedures consistent with the HSEC Policy. The procedures will include provisions for employee training on OHS and emergency preparedness. The procedure will also include a system for reporting incidents and	Provide IFC with a copy of the procedures	Within three months of subscription

	accidents. The procedure will also include define the provisions on OHS requirements for all its contracts for Contractors.		
PS 3 Pollution Prevention & Abatement			
7	Fuels Used and Fuel Storage - Construct a bund wall at the fuel storage site - House the natural gas tanks outside of the cooking areas and install cut off switches for the gas supply to the cooking areas - Nyota will investigate the phasing out of the use local wood for cooking in the camp	Photographs provided to IFC Photographs provided to IFC Provide details of alternative to IFC	Immediate Within three months of subscription Within three months of subscription
8.	Water Supply - Nyota will establish a water supply for its project needs which does not impact on the sources available to the local community (ideally Nyota should have a source for its sole use). - Complete equipping and capacity testing of camp borehole	Documentary evidence of water supply (quantity and quality) provided to IFC Documentary evidence of water supply (quantity and quality) provided to IFC	Within three months of subscription Within one month of subscription
9	Water Resource Monitoring Nyota will monitor community water resources (e.g. well and stream quality and quantity) and any abstraction (quality and quantity) for the Nyota project (eg: river, spring water, borehole) and will	Summary of data including any exceedance of relevant standards in AMR	Start monitoring immediately

	erect an onsite weather station.			
10.	Waste Management			Within 1 month of subscription
	a) Nyota will cease the burning of non-hazardous domestic waste and instead implement compaction and covering of this material in a suitable pit.	Photographs of revised system to be provided to IFC		
	b) Nyota will cease the burning of waste oil and investigate alternative methods of disposal such as recycling back to the company fuel supplier	Documentary evidence of acceptable disposal practice to be provided to IFC		Within 3 months of subscription
	c) Nyota will investigate the alternative methods of domestic water and sewage disposal including treatment options	Documentary evidence of alternative practices to be provided to IFC		Within 3 months of subscription
11	Dust Control			
	Initiate dust suppression (eg: wetting down) in critical areas where tracks pass close to settlements	Positive feedback from communities documented and reported in AMR		Immediately
PS 4 Community Health, Safety & Security				
12	Defensive Driving			
	Nyota will provide defensive driver training to its workers and will ensure that their Contractors follow similar requirements	Provide details of training given in AMR		Start process to initiate training immediately
13	Worker/Community Health Program			
	Nyota will develop awareness and prevention programs appropriate to its level of activities for	Provide details of program in AMR		Within 6 months of subscription

	malaria, HIV / AIDS and any other prevalent diseases.		
PS 5 Land Acquisition and Involuntary Resettlement			
14	Temporary Compensation Process Nyota will also document the process followed for compensation of farmers during the early exploration program. This document will include the policies and procedures and requirements under the Ethiopian regulation.	Provide IFC with a copy of the compensation procedure and documentation for review	Within one month of subscription
15	Land Acquisition and Compensation Plan Nyota will develop a Land Acquisition and Compensation Plan (LACP). The LACP will outline the principles, guidelines and approaches that will be followed for land acquisition activities.	Provide IFC with a copy of the LACP for review and approval prior to disclosure	Within three months of subscription