

SALAMANDER 2011 (#30727)

Environmental and Social Action Plan

Salamander commits to the actions as specified below, within the specified deadlines, and declares that the resources specified below have been allocated.

No.	Action	Completion Indicator	Timeframe
1.	Environmental and Social Corporate Policies (a) Salamander will periodically review and update its Corporate Social Responsibility and Health, Safety and Environmental Policies commensurate with its operational risks and expanding portfolio.	(a) Develop a system for periodic review aligned to the expansion program and portfolio acceptable to IFC (b) Provide a report summarizing annual reviews (both operated and non-operated) and proposed amendments to the Corporate Policies. (c) Develop annual HSE audit program for: i. Operated assets ii. Non-operated assets (d) Include HSE & Social as a formal Senior Management Team meeting agenda item – provide example minutes and agenda	(a) - (e) Annually

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2	Impact Assessment Studies and Risk Analysis (a) Bualuang: Salamander will undertake an Environmental and Social Impact Assessment for installation of the Bualuang offshore production platform and drilling of new wells not covered under the existing field ESIA (b) Salamander portfolio: Salamander will prepare and publicly disclose a full Environmental and Social Impact Assessment and an Environmental and Social Action Plan in line with IFC requirements for all future assets where Salamander is the operator (c) Salamander portfolio: Salamander will ensure that specific requirements under the Performance Standards not addressed through host country requirements are included in impact assessment studies and monitoring (d) Salamander portfolio: Salamander will assess E&S risk via a screening mechanism as part of any farm-in or asset acquisition activity providing IFC with a findings report 10 working days ahead of transaction completion (e) Kambuna: Salamander will undertake (or provide IFC with) a Quantitative Risk Assessment (QRA) of Boiling Liquid Expanding Vapor Explosion (BLEVE) risks and impacts on the Kambuna asset and its workers. The QRA will also assess the need for an exclusion area for the Low Pressure and High Pressure flare (f) Kambuna: Salamander will undertake a QRA based approach in assessing potential risks associated with households located in proximity to the ROW and develop control and mitigation measures if necessary (g) Kambuna: Salamander will undertake a gap analysis to ensure that requirements of the Performance Standards are addressed in the ESIA and EMP	(a) Provide a draft ESIA report for review and comments. Disclose final ESIA on Salamander's corporate website. (b) Provide IFC with draft ESIA for review and comment. Disclose final ESIA on Salamander's corporate website. (c) Submit ESIA/ monitoring Terms of Reference to IFC prior to consultant contract award (d) Submit BBA E&S screening report to IFC prior to farm in (e) Submit draft QRA report to IFC for review and comment (f) Submit draft risk analysis report for review and comment (g) Submit gap analysis report for review and comment.	(a) +180 days prior to installation (b) +30 days prior to EPC contract award (or equivalent) (c) +10 days prior to consultant selection (d) +10 days prior to farm-in completion (e) 180 days after 1st disbursement (f) 180 days after 1st disbursement (g) 180 days after 1st disbursement
3	Management of Change (a) Salamander will develop and implement a management of change procedure and will embed it in the Health Safety and Environment Management System	(a) Submit a procedure acceptable to IFC (b) Integrate procedure within the Company's HSEMS	(a) 60 days after 1st disbursement (b) 60 days after 1st disbursement

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4	Health, Safety and Environment (HSE) Capacity (a) Salamander will develop an HSE staffing plan to ensure that ongoing management of its operations is consistent with its commitments. The plan will include review of job descriptions, roles and responsibilities in line with its expanding portfolio (b) Salamander will strengthen country level HSE capacity through the recruitment of additional full time HSE staff at country level (c) Salamander will strengthen institutional knowledge of IFC's Performance Standards and applicable IFC EHS Guidelines through appropriate training to Regional, General and appropriate line managers, country HSE coordinators, community liaison officers and all staff responsible for managing environmental and social performance.	(a) Develop and submit a plan acceptable to IFC (b) Provide updated organization chart (including filled and budgeted vacant posts) (c) Submit training register	(a) 90 days after 1st disbursement (b) 180 days after 1st disbursement (c) Annually
5	Global Human Resources Policy (a) Salamander will finalize its Global Human Resources Policy in line with the requirements of Performance Standard 2 "Labor and Working Conditions". The policy will address specific elements related to workers' organizations, non-discrimination and equal opportunity, a grievance mechanism for employees and contractor personnel, disciplinary and termination procedures and rights and terms of employment including entitlements, benefits and wages. Salamander will distribute copies of the policy to all its employees (b) As part of the Policy, Salamander will formalize its system for raising workplace concerns.	(a) Provide final approved version to IFC (b) Include grievance mechanism procedures into corporate policy.	(a) 180 days after 1st disbursement (b) 90 days after 1st disbursement

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6	Community Health, Safety and Security (a) Salamander will design a community safety awareness strategy ensuring aspects such as informing local communities in close proximity to Salamander operations of the potential risks and impacts from project activities and ensuring communities emergency preparedness consistent with IFCs Performance Standards requirements. (b) Salamander will document country and asset level emergency preparedness procedures and response activities, resources and activities and will disclose this information in a culturally appropriate manner to the affected communities. Salamander will educate fishermen on adherence to safety zones to reduce the risk of potential collision including management of boat traffic to offshore facilities.	(a) Submit strategy (b) Submit country and asset level plans (c) Provide updates in the annual monitoring review report submitted to IFC	(a) 180 days after 1st disbursement (b) 270 days after 1st disbursement (c) Annual
7	Land Acquisition and Involuntary Resettlement (a) Salamander will prepare detailed Land Acquisition and Compensation Plans (LACPs) for site specific projects where a new project within the operated assets requires resettlement and/or compensation (b) As part of the existing Corporate LACP Framework, Salamander will outline the Company's approach to fishermen's compensation and principles for valuation and calculation of compensation rates consistent with the requirements of PS 5.	(a) Provide draft LACPs for review and comment (b) Disclose LACPs to affected communities (c) Provide IFC with draft fisherman's compensation plan for review and comment (d) Integrate the final fisherman's compensation plan into the Group LACP (GEN-PLA-HSE-0001).	(a) – (d) 60 days prior to resettlement activities
8	Environmental Monitoring (a) Salamander will define an environmental monitoring program for its operated assets and report on environmental parameters - noise, air emissions, and liquid effluents – as part of its environmental monitoring program.	(a) Develop and submit an environmental monitoring program acceptable to IFC (b) Provide environmental monitoring data as part of the Annual Monitoring Report	(a) Annually (as part of AMR) (b) Annually (as part of AMR)
9	Waste Management Plan (a) Salamander will develop a waste management plan for each operated asset in the BBA portfolio to ensure chain of custody is managed appropriately	(a) Develop and submit waste management plans acceptable to IFC	(a) 90 days after 1st disbursement

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10	Community Engagement (a) Salamander will develop country specific level community engagement plans that target affected communities at its operated assets; is gender-inclusive; is a two-way process; ongoing throughout the life of the operations; and documented. (b) Salamander will prepare a Framework Fishermen Management Program that will include: (i) A summary of the identified impacts on fishermen's activities vis-à-vis Salamander's operations and proposed mitigation measures (in consultation with the fishermen associations) for the different project phases, (ii) Compensation framework benchmarked against actual impacts (developed in agreement with the fishermen's associations), (iii) A summary of compensation to date, (iv) fishermen and fishermen's associations engagement strategy, (v) establishment of grievance mechanism specific for fishermen, (vi) community development as part of Salamander's CSR activities and (vi) monitoring framework. (c) As part of the Framework Fishermen Management program, Salamander will develop an engagement program for the fishermen communities affected by the activities in Block 8/38. The engagement program will aim to update the fishermen on project activities, any changes (e.g. to fishing exclusion zones) that may affect them and address any concerns and issues raised. . (d) Salamander will develop a community engagement plan for Kambuna. As part of the community engagement plan for Kambuna, Salamander will develop a specific engagement schedule to raise awareness on pipeline safety and emergency response	(a) Develop and submit country level plans acceptable to IFC (b) Submit draft framework for review and comment (c) Develop and submit a fishermen engagement plan acceptable to IFC (d) Develop and submit a draft community engagement plan for IFC review and comment. Provide IFC with progress reports through the annual monitoring reports submitted to IFC	(a) 180 days after 1st disbursement (b) Discuss timing with Salamander (c) 90 days after 1st disbursement (d) 180 days after 1st disbursement

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11	Community Grievance Mechanism (a) Salamander will develop a grievance mechanism procedure to receive record and resolve concerns and grievances of communities affected by Salamander's operations. Salamander will inform the affected communities about the mechanism during its consultation program. (b) Salamander will formalize its process of receiving complaints from the village heads and explaining to the communities the procedures that will be followed for receiving, reviewing and closing out complaints. Salamander will actively seek to gather updates on grievances that might have been logged to ensure timely resolution of complaints and document them.	(a) Develop and submit country level plans acceptable to IFC (b) Develop and submit complaints register mechanism	(a) 90 days after 1st disbursement (b) 90 days after 1st disbursement
12	Community Development (a) Consistent with its existing community development strategy, Salamander will develop country level annual community development plans outlining descriptions of the proposed projects, partners for implementation, schedule and development impact indicators for monitoring and evaluation.	(a) Submit community development plan acceptable to IFC	(a) 180 days after 1st disbursement