Environmental and Social Action Plan (ESAP)
Sama Nickel, November 9 2011

Sama Nickel 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.

#	Action Description	Indicator of Completion	Timeframe
1	**Sustainability Organization and Management** Develop Health, Safety, Environment and Community (HSEC) Policy documentation with commitments appropriate to the level of activities.	Disclosure of HSEC Policy on Sama website	Within 3 months of subscription
2	**Stakeholder Engagement Plan** Document existing and planned community engagement activities in a detailed **Stakeholder Engagement Plan (SEP)** outlining: a detailed list of stakeholders; the process for engaging the communities process for disclosure of information; and for receiving, documenting and addressing feedback and grievances. The SEP will include a grievance procedure for the local communities, which will be disclosed The SEP will also include a system for documentation of engagement sessions, feedback received, etc, following the guidelines set out in IFC's Publications *"Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets", IFC, 2007; "Addressing Grievances from Project Affected Communities: Guidance for Projects and Companies on Designing Grievance Mechanisms", IFC, 2009*. Sama will hire a community liaison officer responsible for community engagement, compensation, where applicable, 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 impacts that could affect them.	SEP is provided and agreed with IFC.	Within four months of subscription Within four months of subscription
3	**Human Resources Policy** Review Human Resources policies to ensure consistency with the requirements of PS 2; conduct internal training for employees to raise awareness on the HR policy including the grievance mechanism; and provide a copy of the HR policy to all employees.	Provide IFC with a copy of the updated HR Policy for review and approval, training schedule, implementation and completion report	Within three months of subscription
4	**Worker/Community Health Program**		

	a. Develop awareness and prevention programmess appropriate to its level of activities for malaria, HIV/AIDS and any other prevalent diseases. b. Review existing HR policy to include provisions regarding HIV/AIDS on employee rights and responsibilities; employee privacy and confidentiality; non-discrimination and non-compulsory screening.	Provide details of programmes in AMR and submit to IFC copy of the revised policy for review and approval	Within 4 months of subscription for revised policy and 12 months of subscription for AMR reporting and
5	**Security Management Plan** Develop and implement a Security Management Plan which clearly defines roles and responsibility with regards to compliance with (and training on) the UN Voluntary Principles and security issues in general, including a detailed risk assessment matrix identifying areas of threat and accompanied by mitigation measures and guidance for immediate action (emergency preparedness plan) should any incident occur.	Plan provided and agreed with IFC	Within 4 months of subscription
6	**Screening Methodology for High Biodiversity Values** Conduct a screening of target exploration sites to identify potential high biodiversity values associated with those sites. If, based on the results of the screening, high biodiversity values are associated with exploration sites, then identify and implement appropriate mitigation measures. This exercise should be designed and conducted with a well-regarded biodiversity specialist with regional experience in Nimba.	Identify biodiversity specialist, subject to approval by IFC Develop screening methodology, subject to the approval of IFC Develop biodiversity mitigation measures, subject to approval by IFC	Three months prior to exploration Two months prior to exploration, if applicable Prior to exploration, if applicable
7	**Relationship-Building with Conservation Organizations** Initiate dialogue with Nimba Darwin Project and with other international conservation groups with a working presence in Nimba. This should take place as part of an initial stakeholder engagement exercise with the aim to introduce Sama and their activities and to explore the possibility for a long-term partnership in the event that an economic resource is identified in an area associated with high biodiversity values, i.e. in the buffer zone of Mount Nimba Biosphere Reserve.	Provide documentation of efforts and outcomes (e.g., minutes from meetings, trip reports, and other documentation of agreed planned activities, etc.)	Within three months of IFC commitment
8	**Environmental and Social Impact Assessment**		

	Develop a detailed ESIA document addressing local regulatory requirements and IFC Performance Standards as part of a Bankable Feasibility Study prior to any substantive mine construction or development. The completed ESIA will be made available to the public online, at Sama's office in Côte d'Ivoire and Guinea and at suitable locations in the local communities for a minimum of 60 days. Affected stakeholders are to be consulted during the process of developing the ESIA.	ESIA documents submitted to IFC for review and approval prior to public disclosure	Four months prior to start of construction
9	**Biodiversity Partnership and Biodiversity Assessment** If an economic resource is identified and this resource overlaps with an area associated with high biodiversity values, the following will be carried out as part of the ESIA for project development: (i) development of a formal partnership with an internationally-recognized conservation group with regional knowledge and a working presence in Nimba; (ii) a robust literature review and consultation with relevant stakeholders (e.g., conservation organizations, academic institutions, government); (iii) a biodiversity assessment and in-field data collection by qualified regional specialists and species-specialists; (iv) a robust locations alternatives analysis that gives due consideration to high biodiversity values; (v) development of a go/no-go decision process for development and if appropriate development of a mitigation strategy that follows the mitigation hierarchy, prioritizes avoidance measures as the first means to mitigation and demonstrates compliance with PS6.	If applicable, provide IFC with a Memorandum of Understanding (MOU) or similar instrument defining the arrangement with an organization that is suitable and appropriate for the task as agreed with IFC. Completion indicators for tasks (ii) through (v) will be developed by IFC and agreed upon with the company in the event that an economic resource is identified and this resource overlaps with an area associated with high biodiversity values.	If applicable, activities (i) through (v) should take place 6 to 9 months before ground breaking. Exact time frames will be identified by IFC and agreed upon with the company in the event that an economic resource is identified and this resource overlaps with an area associated with high biodiversity values.