

**Final
Rialto Energy
Environmental and Social Action Plan (ESAP)
January 13, 2012**

Rialto Energy 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 Impact Assessment (ESIA) a. Submit Terms of Reference (ToR) for the proposed ESIA studies consistent with the Performance Standards to IFC for review and comment prior to the bidding request for proposals b. Develop a detailed ESIA for the development phase consistent with IFC Performance Standards. The Draft ESIA will be made available to the public online, at Rialto's office in Abidjan and at suitable locations in the local communities. c. The conclusions and recommendations of the draft ESIA will be discussed with project stakeholders and potentially project stakeholders to seek feedback and their views on issues that may potentially affect them and incorporate their feedback into the mitigation plans and project design as appropriate. d. Rialto will convene public consultation sessions to inform the communities of how their feedback is incorporated and disclose the final ESIA.	a. Submit to IFC the draft TOR for review and comment b. ESIA documents for review and approval prior to disclosure to project stakeholders c. Documentary evidence of the consultation process with stakeholders and a register of issues and comments. d. Issuance of final document and public disclosure	a. Jan 31 2012 b. Sixty (60) days prior to the commencement of the development phase c. After completion of the draft ESIA report d. Prior to the issuance of the final ESIA report

2	Health, Safety, Environment and Quality (HSEQ) Management System a. Rialto will update its HSEQ Management System to incorporate IFC Performance Standards and EHS Guidelines. This will include social elements (community engagement, grievance mechanism), environment and social impact assessment, management program, monitoring and reporting and expand on standard operating procedures. b. Rialto will revise the Contractor bridging documents for consistency with IFC Performance Standards and EHS Guidelines.	a. Submit to IFC the revised HSEQ management system for review and approval b. Draft bridging documents submitted to IFC for review and approval prior to issuance of final document	a. June 2012 b. Upon completion of the draft report and prior commencement of the drilling program
3	Oil Spill Contingency Plan (OSCP) a. Rialto will finalize the OSCP consistent with good international industry practices. The OSCP will contain spill scenarios and the potential trajectory of the spills including length of spill to reach the coastline and emergency response and preparedness.	Submit to IFC the draft OSCP for review and comments.	Thirty (30) days prior to commencing the work
4	Organizational Capacity a. Rialto will hire a Corporate Health, Safety, Environment and Social (CHSE&S) to strengthen institutional capacity and ensure that management of its future operations (i.e. development phase) is consistent with its commitments. b. Rialto will hire an in-country Health, Safety, Environment and Social Coordinator to manage HSE&S aspects of the operations. c. Rialto will strengthen institutional knowledge of IFC's Performance Standards and applicable IFC EHS Guidelines to all staff responsible for managing environmental and social performance through training	a. Notify IFC of appointment b. Notify IFC of appointment c. Submit to IFC training proposal	a. February 2012 b. February 2012
5	Monitoring Program a. Rialto will develop a monitoring program for the drilling campaign on all aspects related to HSE&S. The program will monitor contractor compliance and performance in light of Rialto's policies and procedures, bridging documents and IFC Performance Standards and EHS Guidelines applicable to this investment. b. The program will include monitoring of compliance with HSE procedures	a. Submit to IFC a draft of the proposed monitoring program for review and comment	a. 31 Jan 2012 b. First Report April 2012. Subsequent – annually

	including waste and effluent management, spills and spill response; training requirements and worker conditions (working hours, compensation, accommodation) among others. c. The findings of the monitoring program will be reported to senior management and a corrective action plan will be developed to close non-conformances and/or improve HSE&S Performance.	b. Submit to IFC a copy of the findings report c. Submit to IFC copy of the Corrective Action Plan if applicable	
6	Stakeholder Engagement Framework and Plan a. Rialto will develop a Stakeholder Engagement Plan (SEP) that describes the Company’s policies and procedures for consultation with all the relevant stakeholders and affected communities and disclosure of project information and documentation. The Plan will include Ivorian regulatory requirements and be consistent with the Performance Standards. The key components will include: (i) principles and process for identifying stakeholders, (ii) strategy and schedule for sharing information, (iii) grievance mechanism for the affected community to receive and resolve complaints which will be disclosed, (v) a high level schedule for engagement and disclosure of information aligned with the project’s various stages including the ESIA and (iv) a detailed list of stakeholder categories, (v) organizational roles and responsibilities. b. The Plan will include provisions for consultation with project stakeholders and potentially affected communities during the ESIA stage (including a process for receiving, documenting and addressing feedback received during the impact assessment and incorporating into project design and strategy). c. Rialto will report annually on progress made in implementing the company’s environmental and social action plan. The Plan will be consistent with IFC’s “<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.	a. SEP is provided and agreed with IFC prior to disclosure. b. Disclosure of the grievance mechanism in project affected communities and provision of training in its use.	a. Within six (06) months of subscription b. Within one (01) month after completion of final SEP

7	Artisanal and Commercial Fishing a. Undertake a baseline to determine fishing activities in the area surrounding the Block and map fishing grounds with respect to the project; b. Determine the potential impacts that may have significant effects on the fishermen communities in the area of influence - decrease in fishing grounds, impacts on livelihood etc; c. Consultation with the fishermen to gather specific details on the fishing grounds and seasons; and d. Develop a fishermen management plan to address the potential impacts consistent with the requirements of IFC Performance Standards	a. Submit baseline report to IFC for review and comment	a. February 2012 b. Same as ESIA c. Prior to the commencement of the work d. Same as ESIA
PS 2 Labor and Working Conditions			
8	Human Resources (HR) Policy a. Develop a Human Resources Policy manual for its country office in Abidjan consistent with the requirements of PS 2 and the Ivorian labor code.	Provide IFC with a copy of the HR Policy for review and approval	June 29 2012
9	Occupational Health and Safety (OHS) a. Prepare standard operating procedures for its operations in Abidjan consistent with IFC Performance Standards, best industry practice and the WBG EHS Guidelines for Offshore operations. The operating procedures will address aspects related to (i) identification of potential hazards to workers and risk assessment procedures for aspects such as job safety analysis, (ii) mandatory health and safety training for all its field staff including those of the contractors, (iii) fire and life safety, (iv) permit-to-work system, (v) use of personal protective equipment, and (vi) emergency response procedures among others. b. Health and safety performance including that of contractors will be monitored and the results reported to senior management.	a. Submit to IFC the draft procedures for review and comment b. Submit to IFC copy of the report	a. Prior to the commencement of the drilling campaign – February 2012 b. April 2012
PS 3 Pollution Prevention & Abatement			
10	Waste Management Plan a. Finalize the Waste Management Plan	Submit a final copy to IFC	Prior to commence drilling activities
	Monitoring a. Include a monitoring program for the following components (i) Table 1: Effluent levels from Offshore Oil and Gas developments from the WBG Offshore Oil and	Submit to IFC report of the monitoring results	Throughout the duration of the drilling activities

	Gas Health and Safety Guideline		
PS 4 Community Health, Safety & Security			
11	Community Safety a. Organize consultations with the fishermen on safety issues and adherence to the exclusion zone to be applied around the drilling platform. b. Develop emergency response and preparedness for handling emergencies that may involve the affected communities and the fishermen	a. Report describing the campaign and schedule of information sessions	b. Prior to installation of the platform for the drilling campaign
PS 6 Biodiversity, Conservation and Sustainable Management of Living Natural Resources			
12	Marine Environment a. Undertaken a desk review of the current data to assess distribution and conservation status of national and international protected species in the project's area of influence. This will include (i) Turtle nesting areas; (ii) nationally and internationally recognized protected areas; (iii) migratory routes including seasonality and species. b. Retain a qualified marine biologist/expert on biodiversity with regional experience to undertake the desk review and prepare a report.	a. Submit to IFC a copy of the report for review and comment b. Provide IFC with credentials of the expert	a. Prior to the commencement of any work on the ground – 31 Jan 2012 b. Prior to awarding the contract