



Independent Monitoring Group:

Fourth HSEC Monitoring Review



Africa Oil Corporation

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Independent Monitoring Group:

Forth HSEC Monitoring Review

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For and on behalf of
Environmental Resources Management Ltd

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Date: 11 September 2017

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LIST OF ABBREVIATIONS

APELL	Awareness and Preparedness for Emergencies at the Local Level
AOC	Africa Oil Corporation
AoI	Area of Influence
CPF	Central Processing Facility
EHS	Environment, Health and Safety
EHS MS	Environment, Health and Safety Management System
EHS MP	Environment, Health and Safety Management Plan
EOPS	Early Oil Pilot Scheme
ERM	Environmental Resources Management Ltd
ESAP	Environmental and Social Action Plan
ESRS	Environmental and Social Review Summary
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESG	Environmental and Social Governance
FEED	Front End Engineering Design
FFD	Full Field Development
FPIC	Free Prior Informed Consent
GHG	Green House Gases
GIIP	Good International Industry Practice
HR	Human Resources
HSEC	Health, Safety, Environment and Community
IFC	International Finance Corporation
IMG	Independent Monitoring Group
JDA	Joint Development Agreement
JV	Joint Venture
LALR	Land Acquisition and Livelihood Restoration
NMK	National Museums of Kenya
NEMA	National Environmental Management Authority
NGO	Non-Governmental Organisation
SEP	Stakeholder Engagement Plan
SSA	Site Specific Assessment
VSO	Village Socialisation Officer

EXECUTIVE SUMMARY

Africa Oil Corporation (AOC) is a Canada based oil and gas exploration and development company that has been active in Kenya and Ethiopia since 2009 when it acquired an interest in blocks in Kenya and Ethiopia. AOC's current interests include both operated assets (Rift Basin Area Block in Ethiopia and Block 9 in Kenya) and non-operated assets (Blocks 13T, 10BA and 10BB in Kenya). AOC's Joint Venture (JV) partner, Tullow Kenya) is Operator of the non-operated assets in Kenya.

AOC entered into an Equity Subscription Agreement with the International Finance Corporation (IFC) in August 2015 to finance its oil and gas exploration, appraisal and development activities in Kenya and Ethiopia. The agreement requires AOC (and its JV partners) to comply with the IFC Performance Standards on Environmental and Social Sustainability (2012) and undertake specific actions detailed in an Environmental and Social Action Plan (ESAP) and Environmental and Social Review Summary (ESRS).

Environmental Resources Management was commissioned to act as the Independent Monitoring Group (IMG), which is a requirement for projects that have been classified by the IFC as Category A. The first three IMG reviews were undertaken in December 2015, July 2016 and January 2017. This report covers the findings of the fourth review, undertaken in July/August 2017. This review was desk-based given travel restrictions to Kenya during the August 2017 elections, and comprised a review of documents, project presentations by video conference and email discussions.

The Operator is continuing to finalise and operationalise relevant management systems, plans, procedures and guidance to ensure effective identification and management of environmental and social risks. Key to this process has been the development, over the previous review period, of an Environmental and Social Management System and a more comprehensive Site Specific Assessment procedure and associated guidance.

There are no specific AOC operated activities planned in Kenya and Ethiopia over the next six month review period with decisions on potential future operations pending further geological data review. AOC has developed number of Framework management documents and any procedures that are developed for future specific operations will be reviewed within the relevant review periods, along with an assessment of progress against relevant AOC ESAP/ESRS requirements.

The focus of the next review is likely to be on the South Lokichar Basin, as well as the developing ESIA's. A key element of this will be assessing progress in finalising relevant systems, plans, procedures and guidance and embedding these as controlled management documents.

1 INTRODUCTION

1.1 BACKGROUND

In August 2015 *Africa Oil Corporation (AOC)* entered into an Equity Subscription Agreement with the International Finance Corporation (IFC) for financing to support its oil and gas exploration, appraisal and development activities in Kenya and Ethiopia. The agreement included a requirement for AOC to comply with the IFC Performance Standards on Environmental and Social Sustainability (the Performance Standards) and to undertake specific actions detailed in an Environmental and Social Action Plan (ESAP) developed by the IFC and based on the IFC's Environmental and Social Review Summary (ESRS) of AOC's activities that followed the initial IFC site visit in June 2015.

Environmental Resources Management Consulting East Africa Limited (ERM) was commissioned by AOC and the IFC to act as the Independent Monitoring Group (IMG) ⁽¹⁾. The role of the IMG is to conduct a review of Health, Safety, Environment and Community (HSEC) aspects associated with AOC's activities related to oil and gas exploration, appraisal and development in Kenya and Ethiopia with respect to IFC's environmental and social requirements. Reviews will be conducted every six months during the exploration and development phases, and annually during the production phase. The first three IMG reviews were undertaken in December 2015, July 2016 and January 2017. This report covers the findings of the fourth review undertaken in July/August 2017.

1.2 SCOPE OF THE REVIEW

AOC's current interests in Kenya and Ethiopia include both 'operated assets', where AOC leads development activities and 'non-operated assets', where development activities are led by another partner in the Joint Venture. At the time of the previous and current reviews, there were no activities in AOC operated assets in Ethiopia and Kenya. For the purposes of evaluating operational performance the focus of the IMG reviews has therefore been directed at activities in non-operated assets. Currently these are in the South Lokichar Basin in Kenya where Tullow Kenya is the Operator.

Due to travel restrictions to the Kenyan assets during the August 2017 elections, it was agreed with the IFC that the fourth IMG review should be desk based, comprising a review of documents, project presentations by video conference and email/telephone discussions.

(1) As required for projects classified by the IFC as Category A (projects expected to have significant adverse social and/or environmental impacts that are diverse, irreversible, or unprecedented).

1.2.1 *Objectives*

The overall objective of the reviews is to identify areas of non-conformance ⁽¹⁾ within the review framework and to make recommendations for corrective actions or improvements in line with Good International Industry Practice (GIIP). The reviews to date have covered the following areas.

- Progress against the agreed AOC ESAP and ESRS requirements.
- Tullow Kenya operational-level HSEC management plans and procedures.
- Tullow Kenya operational performance where Tullow Kenya is the Operator.

The objectives of future reviews will vary depending on activities being undertaken, *eg* for activities in other blocks in Kenya and Ethiopia or where AOC is the Operator.

1.2.2 *Approach*

The approach taken for the review was as follows.

- Conduct a desk-top review of documentation on the social and environmental risks; HSEC policies, plans and procedures; stakeholder engagement plans; land access plans; and associated studies and reports.
- Undertake telephone interviews and request clarifications or further information from Operator staff.
- Report the IMG review findings.

Each IMG report builds on the previous IMG review report, updating information where required. As each IMG report is designed to be read on its own a certain amount of repetition of information from previous IMG review reports is required, however, where appropriate information from the previous IMG reviews is referenced to avoid unnecessary repetition. The review methodology and action tracking procedure is presented in *Chapter 3*.

1.2.3 *Review Period*

This review covers the activities in progress between the third review in January 2017 and the current review in July/August 2017. Where reference is made in this report to the 'next review period', this would cover the approximately six month period from July/August 2017 to the next review, likely to be in early 2018.

(1) The term 'conformance' relates to specific legal and regulatory measures where compliance can be measured as well as performance standards that are outcome-based.

1.3 *IMG REVIEW TEAM*

The ERM IMG review team comprised three consultants.

- Mark Irvine: Team Leader and Environmental Specialist.
- David Nicholson: Biodiversity Specialist.
- Wanjiku Githinji: Social and Health Specialist.

1.4 *LIMITATIONS*

The findings of this review are based on the Scope of the Review as described above. ERM performed these services in a manner consistent with the normal level of care and expertise exercised by members of the environmental and social consulting profession. The work is based primarily upon documents produced and studies performed by third parties, and follow-up interviews and discussions.

With regard to information provided by AOC, Tullow Kenya and their representatives, ERM has used such information in good faith and with verification limited to requests for clarifications and additional documentary evidence. The assessment and recommendations made are based on professional judgement drawing from the available information and within the limits of the budget and schedule. The information provided in this report should be considered as technical input and not as legal advice.

1.5 *REPORT STRUCTURE*

The remainder of this review report is structured as follows.

- *Section 2* summarises the key AOC and JV assets and status of activities.
- *Section 3* outlines the assessment framework and applicable standards.
- *Section 4* presents an assessment of the progress against the AOC ESAP and ESRS requirements.
- *Section 5* presents the findings of the review with respect to the IFC Performance Standards and recommended actions.
- *Section 6:* presents the conclusions and recommendations for the next review.

The review is supported by the following annexes.

Annex A: Meetings on Current Project Activities and Progress since Last IMG Review.

Annex B: List of Additional Documents Provided by AOC and Tullow Kenya Relevant to Current Activities.

2.1 AOC AND JV ASSETS

Details of AOC and Joint Venture assets have been provided in the previous reviews and an update of assets and current activities is provided here. Current Licence Blocks in Kenya and Ethiopia referred to in this review are shown in *Figure 2.1*.

2.1.1 Operated Assets

Kenya

AOC is the Operator of Block 9 in Kenya. AOC previously conducted exploration activities that included seismic survey over approximately 1,500 km of survey lines and drilling of three exploration wells. AOC's extended licence period for Block 9 expired on 30 June 2017 but has now been extended by the Government of Kenya for a further year to allow for additional desk-based evaluation of the data from the previous exploration activities.

Ethiopia

AOC is the Operator of the Rift Basin Area Block. Airborne gravity gradient surveys and a seismic survey covering approximately 600 km of survey lines was completed within the Block in 2015. The Government of Ethiopia granted two extensions of the license, which now expires at the end February 2018. AOC are currently evaluating exploration data to inform decisions on further activities, eg further seismic surveys or exploratory drilling in this Block.

2.1.2 Non-Operated Assets

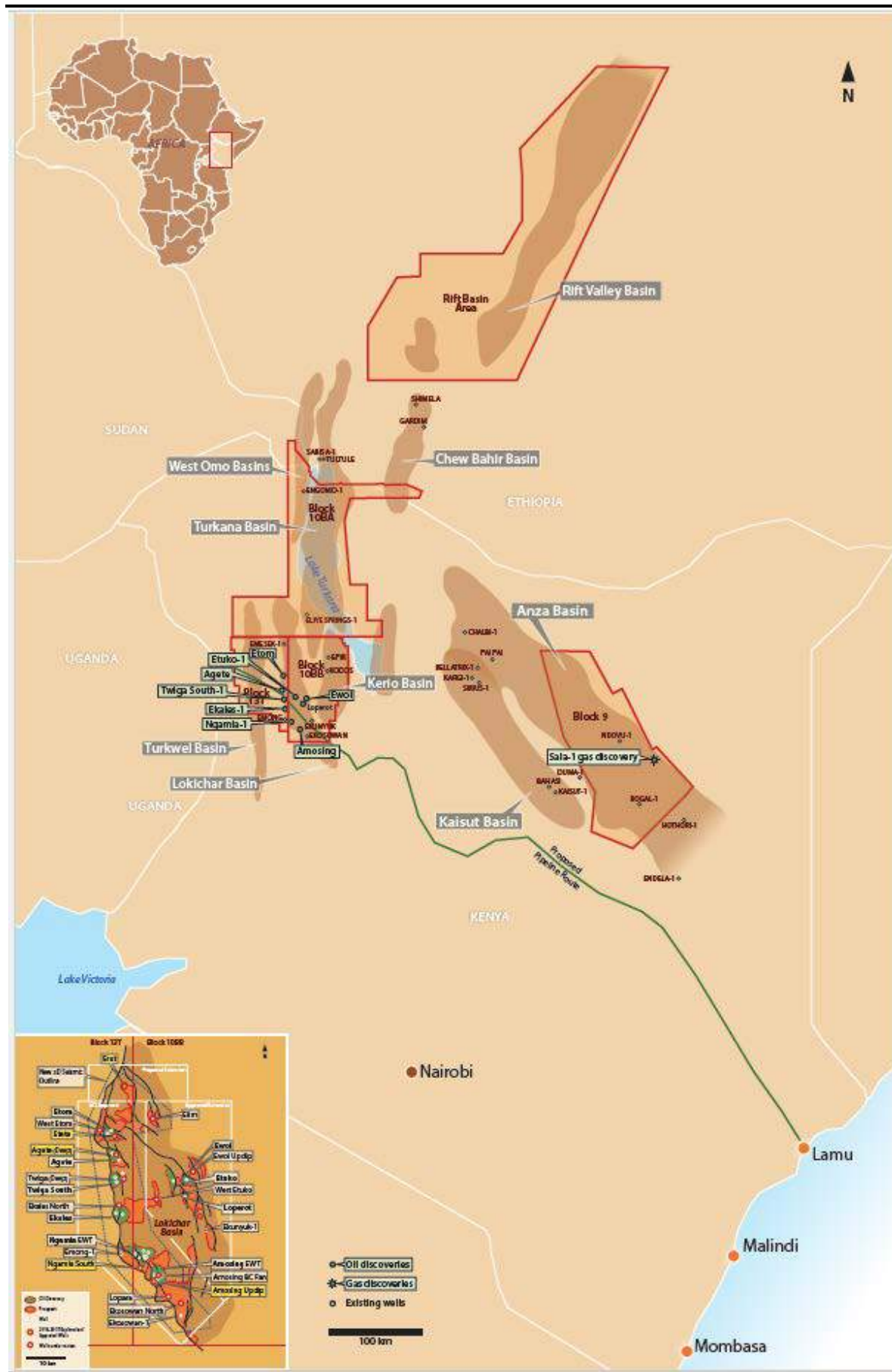
Kenya

Non-operated assets in Kenya include Blocks 10BA, 13T and 10BB in Turkana County. The assets are operated by Tullow Kenya in a JV with AOC and Maersk. Further details of activities in these blocks are presented below.

Ethiopia

It is noted that AOC relinquished its rights to the South Omo Block in early 2017 and there were no activities in the block over the previous IMG review periods.

Figure 2.1 Licence Blocks and Wells in Ethiopia and Kenya



Source: Africa Oil Corporation (March 2017)

For the purposes of this report, the South Lokichar Basin comprises Blocks 13T, 10BB and 10BA. A description of the activities associated with the development of the South Lokichar Basin, along with the environmental and social context, was provided in the previous IMG reviews so is not repeated here other than a summary of the key upstream components and an update on the midstream component.

2.2.1 *South Lokichar Exploration and Appraisal*

The discoveries in the South Lokichar Basin indicate oil reserves of 750 million barrels. In Blocks 10BB and 13T the JV has been given a three-year exploration extension to 18 September 2020. The JV has a firm programme to drill four exploration and appraisal wells in the South Lokichar Basin (located in Blocks 10BB and 13T) with the possibility of extending this by a further four wells. The first exploration well (Erut-1) was drilled in the fourth quarter (Q4) of 2016 in Block 13T in the north of the basin. This resulted in a further oil discovery that is currently being assessed.

In the first half of 2017 a further exploration well (Emekuya-1) and three appraisal wells (Amosing-6, Ngamia-10 and Etom-3) in the south of the basin were drilled. In addition, well testing was undertaken at Etom-2, and well testing and water injection tests were undertaken at Ngamia-5, Amosing-3, and Amosing-2 to collect data to optimise the field development plan.

In the second half of 2017 one new exploration well is planned at Etete along with four appraisal wells (Ekales-3, Ngamia-11, Amosing-7 and Etom-4) and a water injection test (Ngamia-11). In addition, early oil production is planned for Ngamia-3, Ngamia-6 and Ngamia-8.

2.2.2 *South Lokichar Early Oil Pilot Scheme*

Tullow Kenya is evaluating an Early Oil Pilot Scheme (EOPS) designed to produce 2,000 barrels of oil a day from a number of existing Amosing and Ngamia wells for a two-year period. In addition to producing oil for sale, the EOPS would help test the reservoir behaviour and the midstream process to inform the South Lokichar Full Field Development (FFD). The oil would be stored in the existing tanks at the Amosing and Ngamia Extended Well Test sites before being transported by road to oil storage and oil terminal facilities in Mombasa.

Following initial work on the EOPS the project was suspended on 27th June 2017 pending the resolution of a number of issues with the Government of Kenya. An ESIA for the EOPS project is ongoing and is scheduled for completion in the second half of 2017.

2.2.3 *South Lokichar Full Field Development*

The JV is planning to develop the discoveries in phases to allow early production, and ongoing exploration and appraisal activities to run in parallel. The Phase 1 Project is likely to encompass a number of the Block 10BB and 13T discoveries and is currently undergoing pre-Front End Engineering Design (pre-FEED) concept studies to determine the location and design of the various project components. Pre-FEED is scheduled for completion Q4 2017.

The Phase 1 Project is likely to comprise a series of well pads in different fields, interconnecting flowlines, a Central Processing Facility (CPF), and support facilities and infrastructure (eg roads, logistics base/storage areas, and power and water supply). An ESIA for the Phase 1 Project is due for completion during Q3 2018 and will be submitted to the Kenyan National Environmental Management Authority (NEMA) for review and approval.

2.2.4 *Export Pipeline*

The Kenya JV Partners have signed an MoU with the Government of Kenya which confirms the intent of the parties to jointly progress the development of a crude oil export pipeline which will run from the planned CPF at South Lokichar to a marine export terminal that will be built at the Port of Lamu in Kenya. The pipeline Joint Development Agreement (JDA) is currently being finalised. The proposed standalone Kenyan export pipeline is expected to take into consideration potential links with other bordering countries in the future. No ESIA or FEED studies for this export pipeline have commenced within the last review period.

2.3 *BLOCK 12A EXPLORATION*

It is noted that AOC relinquished its rights in Block 12A and withdrew from the JOA and PSC on 31 March 2017. The findings from IMG reviews when AOC had non-operator interests were reported in the previous IMG reviews.

2.4 *SUMMARY OF ACTIVITIES IN EACH LICENCE BLOCK*

A summary of the current status and main activities underway or planned for each of the licence blocks described above are presented in *Table 2.1*.

Table 2.1. Status and Current Activity in each Licence Block

Licence Block	Status	Current Activity
Operated Assets		
Block 9, Kenya	Licence period extended to the end of June 2018 to allow for further evaluation of the data from the previous exploration activities.	No current field activities.
Rift Basin Area Block, Ethiopia	Licence period extended to end of February 2018 to allow evaluation of seismic data and decision to be made on future activities.	No current field activities. A Scope of Work for a biodiversity and hydrological study has been developed. The requirement for undertaking the study will depend on the decision on future activities.
Non Operated Assets		
Blocks 13T, 10BB and 10BA (South Lokichar Basin), Kenya	Licence period extended to September 2020 for blocks 10BB and 13T.	One exploration well and three appraisal wells were drilled in the first half of 2017. Well testing and water injection test were undertaken in the Etom, Ngamia and Amosing fields. In the second half of 2017 one new exploration well is planned at Etete and four appraisal wells at Ekales, Ngamia, Amosing and Etom) and a water injection test at Ngamia. In addition oil production is planned for three wells at Ngamia.
	Approval being sought to progress with Early Oil Pilot Scheme (EOPS) to produce oil from a number of existing Amosing and Ngamia wells for a two-year period.	ESIA for the EOPS scheduled for completion in the second half of 2017.
	The South Lokichar Full Field Development Phase 1 Project is currently undergoing pre-Front End Engineering Design (pre-FEED) concept studies to determine the location and design of the various project components.	Pre-FEED scheduled for completion mid-2017. ESIA for the Phase 1 Project due for completion during Q3 2018.
	MoU signed and Pipeline Joint Development Agreement being finalised with Government of Kenya to progress export pipeline from South Lokichar to Port of Lamu.	ESIA and FEED studies for export pipeline scheduled to commence in the second half of 2017.

3.1 ASSESSMENT FRAMEWORK

The IMG review of AOC's and Tullow Kenya's plans and activities was undertaken through a combination of document review, presentations and interviews. The evaluation was undertaken against the following environmental and social standards.

- Environmental and social laws and regulations of Kenya in force at the time of the assessment.
- AOC's agreed ESAP and ESRS requirements (disclosed by the IFC on 31 August 2015).
- IFC Performance Standards on Environmental and Social Sustainability (2012) (Performance Standards) and related policies including:
 - Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
 - Performance Standard 2: Labour and Working Conditions;
 - Performance Standard 3: Resource Efficiency and Pollution Prevention;
 - Performance Standard 4: Community Health, Safety and Security;
 - Performance Standard 5: Land Acquisition and Involuntary Resettlement;
 - Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
 - Performance Standard 7: Indigenous Peoples; and
 - Performance Standard 8: Cultural Heritage.

The review considered the sector-specific guidelines of the World Bank Group as referenced in the Performance Standards including:

- General Environmental, Health and Safety General Guidelines (April 2007); and
- Environmental, Health, and Safety Guidelines for Onshore Oil and Gas Development (April 2007).

A summary of relevant Kenyan laws and regulations currently in force was provided in the first IMG review so is not repeated here. There are a number of pieces of emerging legislation or legislation that are yet to come into force which are relevant to oil and gas activities in Kenya. These include the following.

- *Community Land Act (2016)*;
- *Petroleum (Exploration, Development and Production) Bill (2015)*;
- *Natural Resources (Classes of Transactions Subject to Ratification) Bill (2015)*;
- *The Energy Bill (2015)*;
- *Land Laws (Amendment) Bill (2015)*.

Of note is the *Petroleum (Exploration, Development and Production) Bill*, which will establish a government authority to regulate, monitor, and supervise upstream petroleum operations. This Bill has undergone parliamentary readings and has now been passed to the Senate. It is not known when this Bill will be enacted, and hence its applicability within the next review period.

3.2 *METHODOLOGY*

3.2.1 *Overview*

The IMG review comprised the following main activities.

- A review of relevant environmental and social documentation and information. Presentations were made by AOC and Tullow Kenya functional heads by video-conference, and copies of presentations and related documents were provided.
- Follow up queries were made through telephone calls and emails to functional leads.
- Activities were evaluated against the reference framework to determine compliance with national laws and regulations, corporate requirements, and conformance with lender requirements. Recommendations were made where applicable to address deficiencies or to improve performance.

Details of the documents provided for review are presented in *Annex B*. The documents submitted for the previous IMG reviews are listed in the previous reports.

3.2.2 *Document Review and Presentations*

HSEC documents covering AOC's corporate management plans and Tullow Kenya's operational policies, procedures and plans were provided prior to and during the previous IMG reviews with updated and additional plans, procedures and associated documents provided for the fourth IMG review.

An operational update was presented to the IMG by AOC and Tullow Kenya outlining operations and HSEC issues and management plans along with progress on actions from the previous IMG review. These covered the following main areas.

- Overview of AOC current and planned operations.
- Overview of Tullow Kenya Exploration and Appraisal Operations (South Lokichar Basin).
- Early Oil Pilot Scheme update and ESIA status.
- Full Field Development ESIA status.
- Pipeline update and ESIA status.
- Site Specific Assessments.

- Land Access.
- Site Restoration.
- Water Resources.
- Contractor Management/Grievance Mechanism.
- Cultural Heritage.
- Security and Asset Protection.

A presentation was given by Tullow on 27 July 2017 by video conference from Tullow Kenya and Tullow London offices with attendance from the IMG team in person in London and by teleconference, and a video conference was held between AOC and the IMG on 1 August 2017. Details of the areas covered and the attendees at these meetings are provided in *Annex A*. A list of additional and updated documents provided to inform the current review is presented in *Annex B*.

3.2.3 *Performance Evaluation*

The status of the findings and the overall performance was rated and evaluated according to the categories presented in *Table 3.1* and *Table 3.2*.

Where appropriate, recommendations have been made to AOC/Tullow Kenya (Company) where the IMG considers that there are issues or situations where performance could be improved to better meet GIIP. Most of these have been provided as comments on the draft plans and procedures and issued to the Company under separate cover. Adoption of such recommendations will be considered by the Company as part of continuous improvement.

Table 3.1. Status Ratings

Status Rating	Criteria	Action
When Required	Work to meet the requirements has not commenced as the relevant phase of the project has not started.	Workplan to be agreed prior to relevant phase commencing.
Open ⁽¹⁾	Work to meet the requirements has not commenced. This may be because a new action has been identified.	Workplan to be agreed with an agreed time period
In Progress	Work to meet requirements is in progress. Some parts of the requirements may be closed and others are planned within a defined time period.	Workplan to be completed with an agreed time period. Some items stated to have been completed may require verification before being closed.
Closed	Requirements have been fully met.	No further action required, but will require ongoing monitoring to ensure future compliance.

(1) This status rating has not been used in this review as there are no new actions that are open.

Table 3.2 Assessment Ratings

Assessment Rating	Criteria	Action
Requirement not met – Level I	Issue or situation not consistent with Applicable Standards or commitments but without an immediate risk or impact to resource or receptors.	Level I Non Conformances will be recorded, along with a recommendation for corrective action to the Company
C Requirement not met – Level II	<p>Issue or situation not consistent with Applicable Standards or Company commitments that has not yet resulted in clearly identified damage or irreversible ESHS impacts, but which requires immediate corrective action to prevent risk of impact to resources or receptors.</p> <p>Recurring issue or situation not consistent with Applicable Standards or Company commitments but without an immediate risk of impact to resource or receptors generally requiring systems-level corrective action.</p>	<p>Level II Non Conformances will generate a corrective action request, and will be recorded.</p> <p>Level II Non Conformances may result in a recommendation to ‘Stop Work’, in those situations where work activity presents on-going ESHS risks.</p>
Requirement not met – Level III	<p>Issue or situation not consistent with Applicable Standards or Company commitments that has resulted in significant observed impact to resources or receptors, or which has a reasonable expectation of imminent damage or irreversible ESHS impacts, and which requires immediate corrective action.</p> <p>Action that indicates intentional disregard for Applicable Standards or Company commitments that has not necessarily resulted in significant impact, generally requiring systems-level corrective action.</p>	<p>Level III Non Conformances will result in a recommendation to the Company to ‘Stop Work’, which will be reported to IFC.</p> <p>The Company will agree a time-bound Action Plan to address the non-conformance to the satisfaction of the Independent Monitoring Group.</p>

4.1 INTRODUCTION

AOC presented an update on progress to date against the IFC ESAP and ESRS requirements on 26 July with a follow up video conference on 1 August 2017.

AOC has produced a number of management plans, in the form of framework documents, outlining the requirements that would apply to any operational plans to be produced at a later date when AOC recommence field operations. These documents have previously been reviewed by the IFC and the IMG and revised framework documents have now been submitted.

4.2 CONFORMANCE WITH ESAP AND ESRS REQUIREMENTS

Table 4.1 presents the tasks identified in the AOC Master Action Plan together with reference to the agreed IFC ESAP and ESRS requirements, and the current status. It is recognised that the original anticipated completion date has passed for some actions that are still to be completed; however this is linked to the delays to commencement of operational activities.

As mentioned above, the AOC framework documents have been revised and in most cases have been assigned as 'closed'. Additional recommendations on the biodiversity framework have been provided to AOC as part of the current IMG review to ensure alignment with IFC PS6.

The project-specific plans and procedures that will be required prior to operations commencing in Block 9 in Kenya or the Rift Basin Area Block in Ethiopia have been assigned as 'when required'. There are a number of on-going actions relating to potential exploratory drilling in the Rift Basin Area Block which will result in project specific reports. These items are also assigned as 'when required', as the requirement and schedule for these to be completed will depend on the decision on future exploration activities.

The ESAP and ESRS requirements relevant to the current and planned Tullow Kenya operations in the South Lokichar Development Project area are mainly closed, with some assigned as 'in progress', pending formal finalisation of documents or completion of current ESIA's.

It is noted that for the EOPS, site-specific plans and procedures will be required to address the relevant ESAP and ESRS requirements where the current plans and procedures are specific to South Lokichar. These will need to be identified through the Operator's Risk Assessments and Site Specific Assessment Procedure, as appropriate.

Table 4.1 Evaluation of ESAP and ESRS Requirements

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
ESAP 1.1	The Company will enhance HSE capacity through i) an IFC Performance Standard focused training for senior management and operational teams	12/31/15	Closed	Training process established and training undertaken
ESAP 1.2	(ii) hiring an Environmental, Social and Governance Manager.	12/31/15	Closed	ESG Manager appointed 9 November 2015.
ESAP 2.1	The Company will develop Stakeholder Engagement Plans (SEP), for its Kenya and Ethiopia activities per the requirements of Performance Standard 1.	3/31/16	When required	Framework document has been produced and approved by IFC. Project specific plans will be developed when required for any future project where AOC is Operator.
			Closed	For the South Lokichar Basin development Tullow Kenya has prepared a Stakeholder Engagement Framework and Pre-Development Stakeholder Engagement Plan. These have been finalised following approved by the IFC.
ESAP 2.2	Company to prepare and submit ESIA's to IFC for review and approval – undertaken per project.	No date	When required	AOC has developed a draft Scope of Work for an ESIA for potential exploratory drilling in the Rift Area Basin Block. The requirement and scheduling for the ESIA will depend on the decision on future activities.
ESAP 3	The Company will complete the additional requirements for Free Prior Informed Consent (FPIC), per the circumstances listed in Performance Standard 7, and complete a mutually acceptable process between Company and affected community and provide evidence of an agreement between the two parties on the outcome of the negotiation	03/31/16	When required	Additional requirements will be completed when required for any future project where AOC is Operator. This project specific requirement will depend on the determination of the existence of and impacts on Indigenous Peoples in AOC's area of operations as determined through the relevant ESIA processes.
			Closed	For the South Lokichar Basin development Tullow Kenya has prepared a Stakeholder Engagement Framework and Pre-Development Stakeholder Engagement Plan that outlines the approach required to achieve and document FPIC based on the definition of the project footprint and specific impacts. These have been finalised following approved by the IFC.
ESAP 4a	The Company will develop an overarching human resource policy (HR) for Kenya and Ethiopia, which will make reference to Performance Standard 2 and ILO conventions, and will include associated country specific implementation procedures	3/31/16	When required	Framework document has been produced and approved by IFC. Project specific plans will be developed when required for any future project where AOC is Operator.
			Closed	Tullow Kenya has an Employee's Handbook that includes a Human Resources Policy. This has been reviewed by the IFC and confirmed as acceptable.

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
	(ii) The Company will develop a Retrenchment Framework Plan that aligns with the requirements of Performance Standard 2 and that should be utilised in cases of collective dismissal by the Company and/or contractor/subcontractor	3/31/16	When required	Retrenchment Framework Plans will be developed prior to commencement of relevant projects where staff/contractors are employed.
			When required	Tullow Kenya follows national law and compliance with IFC requirements with regards to retrenchment and has prepared plans for previous retrenchment requirements. For any future retrenchment specific plans will be prepared.
	(iii) The Company will develop and implement a formal internal grievance mechanism applicable to all employees and workers employed at Company's sites by contractors and sub-contractors.	3/31/16	Closed	Framework document has been produced and approved by IFC.
			When required	AOC will develop a formal worker grievance mechanism when required for any future project where AOC is the Operator.
			Closed.	Tullow Kenya has an Employee's Handbook that includes a Human Resources Policy. This has been reviewed by the IFC and confirmed as acceptable.
ESAP 4b	The Company will prepare a security risk assessment and develop Security Management Plans that are aligned with Performance Standard 4. These will be reviewed and updated as the project evolves.	3/31/16	Closed	Framework document has been produced and approved by IFC.
			When required	Project specific Security Management Plans will be developed when required for any future project where AOC is Operator.
			Closed	Tullow Kenya has prepared Security Management Plans for ongoing activities and submitted these and supporting studies to IFC for review and they have been confirmed as acceptable.
ESAP 5.1	The Company will develop Land Acquisition and Livelihood Restoration (LALR) Plans for each of the two countries (Kenya, Ethiopia).	3/31/16	Closed	Framework document has been produced and approved by IFC.
			When required	Project specific LALP plans will be developed when required for any future project where AOC is Operator.
			In progress	Tullow Kenya has prepared a Draft Land Access Framework. This has been approved by the IFC with minor revisions required. Land access negotiations using this framework are ongoing for the current pre-development drilling operations. This element of the action will be closed pending finalisation of the Framework following consultations with the Government of Kenya and the Turkana County Government. Currently expected in 2018.
ESAP 5.2	The Company will redesign its compensation plan in Ethiopia to incorporate procedures to compensate prior to commencing work, vacating land and any potential damage that could occurred after seismic survey.	07/31/16	Closed	Compensation Plan redesigned and the Management of Change provided to IFC as evidence.
ESAP 6.1	(i) The Company will develop a biodiversity strategy for Kenya as described in the ESRS.	4/31/16	In Progress	A revised Framework document has been submitted and additional recommendations have been provided by the IMG. It is

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
	(ii) The Company will develop a similar plan prior to any substantive work related to development of successful wells in Ethiopia			expected that this document will be revised within the next IMG review period or prior to any AOC operations, whichever is the sooner.
			When Required	AOC has developed a Scope of Work for a rapid biodiversity study for potential exploratory drilling in the Rift Basin Area Block. The requirement and scheduling of this will depend on the decision on future activities. The IMG has provided recommendations on the document to align it more fully with the requirements of IFC PS6.
			When required	AOC will prepare and submit a project specific Biodiversity Strategy prior to future operational activities.
			In progress	For blocks where Tullow Kenya is the Operator a Kenya Biodiversity Management Framework has been reviewed by the IFC and finalised. IFC advised that a Biodiversity Panel should be initiated to support Full Field Development decision making prior to completion of the FFD ESIA (scheduled for Q3 2018). The Terms of Reference for the biodiversity panel is currently under development and it is planned to have the panel in place by Q4 2017.
ESAP 7	The Company will prepare and submit ESIA's to IFC addressing local regulatory requirements and IFC Performance Standards in any case where wells progress to production. These will be presented to IFC for review and approval at least four months prior to start of any substantive construction.	12/31/16	When required	AOC will prepare and submit project specific ESIA's prior to any future production activities where AOC is the Operator.
			In Progress	Tullow Kenya has completed ESIA's for all activities currently underway and planned for 2017. An ESIA for the EOPS is expected to be completed in the second half of 2017 and the Upstream South Lokichar Development Project ESIA is expected to be completed during Q3 2018.
ESRS 1	PS3: Hydrogeological study of Ethiopian blocks if there is further operational activity	No Date	When Required	AOC has developed a Scope of Work for a hydrological study for potential exploratory drilling in the Rift Area Basin Block. This study is linked to the biodiversity study (see ESAP 6.1) and the requirement and scheduling of this will depend on the decision on future activities.
ESRS 2	PS3: Quantify and report greenhouse gas (GHG) emissions for all activities	No Date	When required	AOC has developed a system for tracking GHG and commenced tracking of GHG at the start of 2016. Full implementation of this requirement is pending commencement of AOC Operator led activities.
			Closed	For blocks where Tullow Kenya is the Operator a data gathering and reporting mechanism is in place.

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
ESRS 3	PS 8: Ensure cultural heritage management plan is in place for future exploration and development activities	No Date	When required	Framework document has been produced and approved by IFC. Project specific plans will be developed when required for any future project where AOC is Operator.
			Closed	For the South Lokichar Basin exploration, appraisal and development Tullow Kenya has a Cultural Heritage Management Procedure.

Note: grey shaded items are closed.

5.1 INTRODUCTION

As in the previous IMG reviews, the focus of the fourth IMG review was the activities that have been undertaken and planned for the near future in the South Lokichar Development Project area ⁽¹⁾ and the systems and processes that the operator Tullow Kenya has in place and/or is developing.

Comments on progress that has been made since the last review to address the previous observations and recommendations are presented under each Performance Standard below. Reference numbers for each observation under each Performance Standard are provided indicating under which review they were originally made (Review 1 as Rev1, Review 2 as Rev2, etc).

As no site visit was undertaken for the fourth IMG review no new observations have been made, however, updates to previous observations based on the revised and new documents submitted to the IMG have been provided under the relevant findings.

5.2 PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

Environmental and Social Assessment Management Systems, Policy, Identification of Risks and Impacts, and Management Programmes (Rev1-PS1-1, Rev2-PS1-1)

Previous IMG reviews identified the need to finalise and operationalise various EHS management plans and procedures as controlled documents and list these with an integrated ESMS to ensure effective management of project risks and impacts.

For the fourth IMG review, a draft *Tullow Kenya Environmental and Social Management System Manual* was provided which described the ESMS and listed the key management plans and procedures. The overall approach was considered to be comprehensive and addresses the key concerns raised in the previous IMG reviews with respect to compliance with the requirements of PS1.

The IMG made recommendations on the draft document to address some specific details and it is expected that this ESMS Manual will be finalised and the ESMS operationalised within the next review period. This item remains open pending finalisation of the ESMS Manual and associated controlled documents which are expected to be completed within the next review period.

(1) The Development Project area means the area that includes the primary project site(s) and related facilities that the client (including its contractors) develops or controls.

Environmental and Social Assessment Management Systems, Policy, Identification of Risks and Impacts, and Management Programmes (Rev3-PS1-1).

Previous IMG reviews identified that to meet the requirements of IFC PS1 the Site Specific Assessment (SSA) procedure needed to be revised and fully embedded in the site selection, site assessment and EHS management process with activities and decisions formally documented.

A more comprehensive SSA Procedure has now been developed (T-KE-ESP-PRO-0003) and evidence has been provided of its application for new activities at the Ekales-C, Etiir-A and Etom-D exploration well sites. The risk based approach that has now been adopted is consistent with environment and social impact assessment best practices. The IMG considers that the revised procedure contains good processes to guide the assessment of IFC PS values for sites and therefore broadly addresses this issue. However, some additional recommendations have been made below on refining the SSA Procedure's content (at *Rev1-PS1-5, Rev1-PS3-1, Rev1-PS3-2, and Rev1-PS3-3*). Implementation of the SSA Procedure in the field will be reviewed in subsequent IMG field visits.

Organisational Competency, Capacity and Training (Rev-3 PS1-2)

Previous IMG reviews have concluded that whilst the Operator is managing the E&S issues associated with on-going activities, increased capacity and on-going training will be required for the more intensive activities during the planned exploration and appraisal activities and the Full Field Development.

The Operator has reported that it undertakes an annual review of planned activities and likely resource requirements and training needs. This is reviewed and updated as required to address significant changes to work plans and resource and training needs. A draft procedure addressing resource planning was submitted for the current IMG review. It is recommended that the draft procedure adopt the structure and format of other key project controlled documents and be operationalised to ensure adequate resource planning, recruitment and training for planned exploration and appraisal activities, and the Full Field Development activities. The IMG recommends that the procedure should be finalised and issued as a controlled document within the next review period to comply with the requirements of IFC PS1 and to ensure that a robust process is in place prior to increased work activities.

Stakeholder Engagement, Disclosure of Information and Grievance Mechanism (Rev1-PS1-4)

The *Pre-development Stakeholder Engagement Plan for the South Lokichar Basin* (T-KE-ESP-FRM-0002) presents a comprehensive and robust set of procedures for the development and management of relationships and provision of information to national and county government, local communities and other stakeholders. The SEP, finalised in March 2017, also addresses the issue of community engagement for the permanent land access that will be required

for the development project and includes details of the adopted Free Prior Informed Consent (FPIC) process as required under IFC Performance Standard 7 and the circumstances where it applies. The SEP has now been issued as a controlled document and posted on the Operator's website. The IMG considers that this item is now closed.

Monitoring and Review (Rev1-PS1-5)

Recommendations were made in the previous IMG reviews that auditing and compliance procedures should be further developed so that they are more measurable and evidence based and linked to the SSA procedure to improve transparency and accountability.

The revised SSA Procedure (*T-KE-ESP-PRO-0003*) and example site-specific EMPs were provided for the current review. The revised procedure addresses a number of the issues raised previously regarding providing more measurable and evidence based assessments, however, further recommendations have been provided by the IMG so that the monitoring and review requirements are more fully addressed (see also *Rev1-PS3-2* below). It is recommended that these matters are addressed within the next review period.

5.3

PERFORMANCE STANDARD 2: LABOUR AND WORKING CONDITIONS

Contractor Management and Monitoring (Rev1-PS2-1)

In previous IMG reviews the issue of contractor management and performance monitoring was identified as a project risk. To address this issue the Operator drafted *HR Guidelines for Contractors* and a *Contractor Non-Technical Risk Management Procedure* (which covers the expectations of contractors and their key obligations for delivering a Non-Technical Risk Management Plan for their specific activities).

During the third IMG review it was observed that they were still in draft form and had yet to be operationalised. During the fourth IMG review it was reported that these documents are now undergoing review by the Operator's legal department and are planned to be finalised in Q3 2017 and thereafter rolled out to contractors.

Formalisation of Worker Grievance Mechanism (Rev1-PS2-2)

The draft *Contractor Employee Grievance Management Guidelines* (dated 4 July 2016) and the draft *Workers Council Framework* (dated 7 July 2016) were provided at the time of the third IMG review. The IMG considered that whilst these were generally aligned with the requirements of IFC PS2, improvement should be made to provide additional detail outlining the scope, role and implementation of the Workers Councils to provide transparency on the running of the Workers Council. Specifically it was recommended that

guidance should be included on minimal requirements on how often the various levels of workers councils should meet, how representatives will be selected and how issues will be taken forward from individual contractor workers councils to the joint workers council, and then fed back to the employees and how the workers councils will interact with other worker management functions, Human Resources and Legal departments.

It was reported by the Operator at the time of the current IMG review that these documents had not yet been updated and finalised and were undergoing review by the Operator's legal department with a plan to finalise these in Q3 2017. This item therefore remains open pending finalisation of these documents and operationalisation of the Workers Councils which are expected within the next review period.

5.4 PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

Site Specific EHS Management Plans (Rev1-PS3-1)

Previous IMG reviews identified the requirement for management plans to enable risks to be identified and managed at a site specific level. The revised Site Specific Assessment (SSA) procedure (*T-KE-ESP-PRO-0003*) includes provision for the development of site specific EHS management plans and two examples of such management plans were provided to the IMG for current review. Further comments on specific parts of the SSA procedure are provided under *Rev1-PS3-2* and *Rev1-PS3-3* below.

Site Specific Assessments (SSA) Criteria (Rev1-PS3-2) & Measurable HSE Components (Rev1-PS3-3)

The IMG recommended in previous reviews that the SSA procedure be updated to enable more site-specific and measurable assessments, and to improve the applicability, transparency and auditability of any such assessment for a specific site. For the current IMG review, the Operator provided a revised SSA procedure (*T-KE-ESP-PRO-0003*) and examples of where the new SSA procedure had been applied for Ekales-C, Etiir-A and Etom-D exploration wells.

The revised procedure has addressed the key issues raised in the previous IMG reviews and contains more robust processes to guide the assessment of environmental and social risks for sites. The adoption of a risk based approach is consistent with environment and social impact assessment good industry practice. Additional recommendations on the SSA Procedure have been provided to the Operator within the current review on refining the severity triggers within the risk assessment matrix, and on defining natural/modified habitats and quantifying residual impacts required to be offset, with respect to the requirements of PS6. Finalisation of the SSA, taking

into account these recommendations, is expected within the next review period.

Sediment and Erosion Control (Rev1-PS3-4 and Rev2-PS3-4)

During previous reviews, the IMG had commented on sediment and erosion control measures for operations, including road construction, line clearance well pad restoration. The Operator has previously provided the *Line Clearance and Restoration Guidelines* (T-KE-EHS-GUD-0003 Rev02) for review by the IMG. Generally, the document provides a sound framework for managing sediment and erosion during activities. However, further recommendations have been made during the current review on the consistency of the guidelines with the revised SSA procedure, and the draft *Emong Full Restoration Plan* and *Emong Revegetation Project* (see Section 5.7 below). Further recommendations have also been made regarding the use of best practices and the need for training of field staff. It is expected that these recommendations will be completed within the next review period or prior to commencement of further seismic surveys, whichever is the sooner.

Consumption of Water and Energy (Rev 3-PS3-5)

During the previous IMG reviews the Operator presented details of the technical hydrology studies and strategic option appraisal that was being undertaken to assess the needs and water supply options for the long-term provision of water for the Full Field Development. The IMG considers the approach being taken as comprehensive with detailed information on the practical options being collected and evaluated. The final decision on the preferred option will be made on the basis of the overall most secure, deliverable and sustainable option, which will be informed by the FFD FEED and the FFD ESIA (due in Q3 2018), will then be subject to Government of Kenya permitting approval. There are no further IMG observations at this stage, pending the conclusion of the evaluation process.

5.5

PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY AND SECURITY

Emergency Response Plan (Rev1-PS4-1)

To update the Operator's *Emergency Response Plan* to include involvement of and disclosure to the community and local authorities when responding to emergency situations the Operator has developed an Awareness and Preparedness for Emergencies at the Local Level (APELL) approach. It was reported by the Operator at the current IMG review that a pilot programme has been established with training of Village Socialisation Officers (VSOs) from areas around blocks 10BB and 13T and engagement with Deputy County Commissioners for Turkana East and Turkana South. Further engagement and exercises are planned over the next review period. It was also reported that an MOU between the Operator and the National Police Service of Kenya

was signed in July 2017 addressing the attachment of Police Officers to support Operator activities.

The IMG considers that the requirement for the Emergency Response Plan to include involvement and disclosure to the community and local authorities is now closed. Implementation of the adopted approach in the field will be reviewed in subsequent IMG field visits.

Health Profiles of Potentially Affected Communities (Rev1-PS4-1)

In previous IMG reviews a gap was identified in the documentation of health profiles of the potentially affected communities to understand the existing health baseline conditions and the risk of community exposure to disease, including the potential impact of project activities on local communities such as workforce interaction with communities. The ESIA currently being conducted for the FFD will address this requirement, and will provide input to further developing the Community, Health, Safety and Security Management Plan. The ESIA is due for completion by the end of Q3 2018, therefore this item remains open pending review of the ESIA.

5.6 ***PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT***

Nothing to report from this review

5.7 ***PERFORMANCE STANDARD 6: BIODIVERSITY AND SUSTAINABLE MANAGEMENT OF LIVING RESOURCES***

Baseline Biodiversity and Habitat Assessment; Ecosystem Services Screening; Conservation Significance Mitigation; Biodiversity Action Plan; Invasive Species Management; Decommissioning and Restoration; Supply Chain Sustainability Assessment; and Monitoring and Evaluation Criteria (Rev1-PS6-1 to Rev1-PS6-8).

The IMG observed during previous reviews that several elements of IFC PS6 were being assessed through the current ESIA for Phase 1 of the South Lokichar Development Project. This included the assessment of Natural Habitat and Modified Habitat within the South Lokichar Basin exploration blocks with further assessments being undertaken to benchmark the condition of vegetation types within the landscape and to apply appropriate metrics to determine the current status of the habitat types. The IMG was informed in the current review that the mapping has now been completed and will contribute to the baseline and impact assessment sections of the EOPS ESIA, due for completion in the second half of 2017. It is therefore expected that this assessment will be completed within the next review period.

Compliance with IFC Performance Standards in Exploration Blocks (Rev2-PS6-9)

During previous IMG reviews, it was observed in the field and through review of documentation that there may be gaps in the application of IFC

Performance Standard 6 for exploration activities in licence blocks where the block-wide ESIA has not fully addressed biodiversity issues. During the current review, it was determined that the revised SSA procedure addresses this issue.

The current review recommends that the Operator's document *Biodiversity Management* (dated June 2016) should be updated to comply with the requirements of IFC PS6 by setting a net-gain goal for offsetting residual impacts on critical habitats and addressing specific requirements for operating within protected areas. It is expected that this update will be completed within the next review period.

Restoration Activities (Rev2-PS6-10)

The IMG was informed in previous reviews that the development of procedures and pilot studies to enhance land restoration were pending identifying a suitable scientific research partner. The IMG was subsequently provided with the *Line Clearance and Restoration Guidelines (T-KE-EHS-GUD-0003 REV02)* that outlined the approach to manage restoration of disturbed sites and comments were submitted to the Operator. For the current review, the draft *Emong Full Restoration Plan (T-KE-EHS-PLN-XXXX)* was provided for review. The plan is considered by the IMG to provide a good framework for restoration activities. Recommendations have been made by the IMG suggesting amendments on the management of invasive species, avoidance of exposure of sterile subsoil during re-contouring, and the requirement for specific monitoring measures to assess the performance of the planting trials.

Linked to this plan, two additional documents were provided during the current review on the Emong Revegetation Project trial. Both documents outlined community engagement activities and progress in applying the restoration plan. The IMG has recommended that a standard reporting template be prepared to demonstrate compliance with the restoration plan to support effective implementation.

Management of Invasive Species (Rev2-PS9-11)

The draft *Invasive Species Management Procedure* (dated September 2016) was provided for IMG review and recommendations on including references to relevant international guidance tools (such as the Global Invasive Species Directory and Invasive Species Compendium) and the need for screening and specific measures to be outlined for identified species. This will provide more effective management practices to control invasive species, where needed.

Free Prior and Informed Consent for Land Access (Rev1-PS7-1)

In specific locations such as Turkana, FPIC should be applied in the land acquisition process to address the particular social sensitivities. The draft *Land Access Framework for the Project Development Phase of the South Lokichar Basin* provided at the third IMG review included an approach to land access in Turkana County which makes specific reference to the FPIC requirement, including a template Consent Agreement. As there is ongoing access to land for the current exploration and appraisal activities in Turkana which requires community consent the FPIC process is being applied to the land access negotiations and signed agreements.

Although there was evidence of the process being applied in the field from the last IMG review this item remains open as finalisation of the Land Access Framework is pending formal review and agreement from the Government of Kenya, which is expected by the end of Q4 2017.

Cultural Heritage Training (Rev1-PS8-1)

The first IMG review identified that although overarching management measures are in place, the site specific assessment is not being applied to road development activities and as such no determination of the need for a *Cultural Heritage Management Plan* was being made. It was further recommended that ongoing training is required for field staff in assessing cultural heritage issues during SSAs and during field operations.

For the current review it is noted that the revised SSA procedure (*T-KE-ESP-PRO-0003*) requires consideration of roads and other supporting infrastructure as well as requirements for training and awareness raising for contractors and the requirement to work with Operator staff, NMK and/or TBI, as required. The IMG considers that this now meets the requirement of IFC PS8 and this item is now closed.

Relocation/Management of Cultural Sites Procedure (Rev3-PS8-2)

At the third IMG review it was reported that two community members had come forward to report the potential presence of a grave site within a newly opened well pad at Amosing-6. Shallow graves in Turkana are usually covered with branches and sometimes a few stones and over time these can get dispersed, making the location of older grave sites hard to recognise. The site had been subject to a SSA and Land Access Agreement with the community and during this time the community had not mentioned the presence of a grave site. In this case the Operator was able to demarcate and

avoid the area of the grave site and a cleansing ceremony was undertaken in response to the grievance raised.

For the current IMG review a revised Cultural Heritage Management Procedure (T-KE-EHS-PRO-024) was provided. This now includes additional measures on managing paleontological and archaeological heritage to address the issue of unexpected grave sites or other locally important sacred sites. This includes a requirement for the provision of compensation and/ or other ceremonies to relocate these sites or to allow them to be disturbed. The IMG considers that this now meets the requirement of IFC PS8 and this item is now closed.

Table 5.1 Evaluation of IFC Performance Standard Requirements

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
Performance Standard 1 Assessment and Management of Environmental and Social Risks and Impacts						
Dec 2015 Rev1-PS1-1	<i>Environmental and Social Assessment Management Systems, Policy, Identification of Risks and Impacts, and Management Programmes</i>	The first IMG review identified that the various project and Company documents were a combination of controlled documents and uncontrolled documents and reports without authors' names, issue dates and revision/status.	EHS policy, plans and procedures should be controlled through an overall Project Environmental and Social Management System. Documents should be assigned document numbers, dated, signed off and have a review date. A comprehensive EHS document register listing the in-date controlled documents, the planned review cycle and the status of supporting documents would be a first step in this process.	Operator HSE and SP Teams with respect to their relevant operations. End of Q4 2017	In Progress A draft ESMS Manual has been prepared and reviewed by the IMG and recommendations made for further improvement. It is expected that this document will be finalised and operationalised within the next review period.	Level I Action required to address this issue to avoid future risks
Jun 2016 Rev2-PS1-1		In the second IMG review it was further recommended that all documents relevant to conformance with IFC PS are listed within the overall ESMP. The Operator indicated that the majority of documents relevant to the South Lokichar Development Project will be available within the next review period and will therefore form part of future IMG reviews.	All management documents relevant to conformance with IFC PS should be listed within an overall Project ESMP giving their name, reference number; revision number and review date so that these can be effectively tracked. In addition to HSEC management documents, the list should include relevant Human Resources, Grievance Mechanism and Contractor Management documents	Operator HSE and SP Teams with respect to their relevant operations. End of Q4 2017	In Progress A draft ESMS Manual has been prepared and reviewed by the IMG. It is expected that this document will be finalised and operationalised within the next review period.	Level I Action required to address this issue to avoid future risks
Jan 2017 Rev3-PS1-2	<i>Organisational Competency, Capacity and Training</i>	The Operator reported that an annual review of planned activities, resource requirements and training needs is undertaken and that the requirements are reviewed when there are significant	Operator will ensure that resources plans and training are documented are updated in response to changes. Resource planning and training documents will be reviewed as part of the next IMG Review.	Operator HR Department End of Q4 2017	In Progress A draft resource planning procedure has been provided for review. Further work is required to fully develop and	Level 1 Action required to address this issue to avoid future risks

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
		changes to planned activities. It is noted that increased capacity and on-going training will be required for the more intensive activities during the Development Project.			operationalise this procedure to plan for adequate resources as the E&A and FFD project progresses.	
Dec 2015 Rev1-PS1-5	<i>Monitoring and Review</i>	Recommendations were made in the previous IMG reviews that auditing and compliance procedures should be further developed so that they are more measurable and evidence based and linked to the SSAs procedures to improve transparency and accountability.	Refinement of auditing and compliance procedures should be considered to be more measurable and evidence based. Based on improved criteria included in SSAs and site specific EHS MPs, auditing and compliance assessments could move to a measurable and evidence based approach, reducing subjective judgments on compliance.	Operator EHS Team Revised SSA Procedure to be finalised by the end of Q4 2017.	In Progress Site Specific Assessment Procedure Rev2 (T-KE-ESP-PRO-003) revised to address these issues. Further recommendations made by the IMG on assessment criteria.	Level I Action required to address this issue to avoid future risks
Performance Standard 2 Labour and Working Conditions						
Dec 2015 Rev1-PS2-1	<i>Contractor Management and Monitoring</i>	Previous reviews of contractor management and performance monitoring was identified as a residual project risk.	Existing contractual agreements should be reviewed to ensure that contractor performance requirements are captured within the agreements, as well as detailing corrective measures that may be required to address any non-compliance. Training sessions for contractor holders are required to ensure that they have the capacity and resources to manage and monitor contractor performance. Training should include an identification of any gaps in capability to manage contractors, as well as development of measures required to fill these gaps.	Operator Above Ground Risk Integration and Performance Manager End of Q4 2017	In Progress <i>Draft Contractor Non-Technical Risk Management Procedure</i> was provided to the IMG for review and recommendations have been made. It is expected that this procedure will be finalised and operationalised over the next review period. <i>Draft HR Guidelines for Contractors</i> (1 July 2016) undergoing review by the Operator's legal department and should be finalised by the end of Q3 2017.	Level I Action required to address this issue to avoid future risks

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
Dec 2015 Rev1-PS2-2	<i>Formalisation of Worker Grievance Mechanism</i>	Measures are not in place to manage worker grievances associated with contractors on site and to enable communication between the workforce and the Operator.	Worker Councils should be formed to represent the different contractors, and provide a functional worker grievance mechanism.	Operator HR Department End of Q3 2017	In Progress Contractor Employee Grievance Management Guidelines and Workers Council Framework to be finalised by the end of Q3 2017.	Level I Action required to address this issue to avoid future risks
Rev2 PS2-2		It is noted the grievance mechanisms in the <i>Tullow Employee Handbook</i> and the draft <i>Contractor Employee Grievance Management Guidelines</i> that no reference is made to workers' rights to seek recourse in law if grievances cannot be settled through internal procedures. The draft <i>Workers Council Framework</i> is generally aligned with the requirements of IFC PS2.	Whilst workers have this right under Kenyan law it is recommended that the Tullow Kenya employee handbook and the grievance mechanisms are updated to specifically address this requirement. The draft <i>Workers Council Framework</i> should be updated to include details on the scope, role and how the Workers Council will function practically. This will set out the Terms of Reference for the Council and help ensure it achieves its objectives.	Operator HR Department End of Q3 2017	In Progress Contractor Employee Grievance Management Guidelines and Workers Council Framework to be finalised by the end of Q3 2017.	Level I Action required to address this issue to avoid future risks
Performance Standard 3 Resource Efficiency and Pollution Prevention						
Dec 2015 Rev1-PS3-1	<i>Site Specific EHS Management Plans</i>	The IMG identified during the first review that general management plans have been developed for block wide/operational requirements for various environmental elements. It was observed that these plans were not tailored for specific sites or operations and that site specific plans would enable specific risks to be identified and managed at a	Site specific EHS MPs for all well pads, camps, roads, seismic surveys and other significant operations are required. These should be linked to the developing SSA procedure (see Rev1-PS3-3 below).	Operator EHS Team Further update of SSA Procedure to address comments by Q4 2017	In Progress Site Specific Assessment Procedure Rev2 (T-KE-ESP-PRO-003) revised to address these issues. Draft SSAs were provided for 3 well sites and recommendations to further improve the SSA procedure provided by the IMG.	Level I Action required to address this issue to avoid future risks

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
		site specific level				
Dec 2015 Rev1-PS3-2	<i>SSA Criteria</i>	During the first IMG visit, it was observed that the road network established within blocks required assessments using the SSA Procedure. Appropriate road design standards are also required for the construction and maintenance of roads.	Operator to ensure that the SSA Procedures references relevant design criteria and appropriate management practices specific to the activity for which the SSA is being undertaken.	Operator EHS Team Further update of SSA Procedure to address comments by Q4 2017	In Progress Site Specific Assessment Procedure Rev2 (T-KE-ESP-PRO-003) revised to address these issues. Additional recommendations on this version have been provided by IMG	Level I Action required to address this issue to avoid future risks
Dec 2015 Rev1-PS3-3	<i>Measurable HSE Components</i>	A revised draft SSA Procedure and site specific EMP procedures were provided prior to the third IMG review. A review of the draft Procedure indicates that further work is required.	The SSA Procedure should include: description of the planned activities, a scoping process to identify the environmental and social elements to be assessed, relevant baseline information, and impact assessment methodology. The outcomes should link with the EHS-MP (see Rev1-PS3-1).	Operator EHS Team Further update of SSA Procedure to address comments by Q4 2017	In Progress Site Specific Assessment Procedure Rev2 (T-KE-ESP-PRO-003) revised to address these issues. Additional recommendations on this version provided by IMG	Level I Action required to address this issue to avoid future risks
Dec 2015 Rev1-PS3-4	<i>Sediment Erosion Control</i>	The first IMG review recommended that a sediment and erosion control plan be developed for specific project activities and linked to the SSA procedures.	Company will develop a sediment and erosion control procedure.	Operator EHS Team Further update of SSA Procedure to address comments by Q4 2017	In Progress Site Specific Assessment Procedure Rev2 (T-KE-ESP-PRO-003) revised to address these issues. Additional recommendations have been provided by the IMG including suggested reference to good industry practice methods to help field operatives identify suitable methods.	Level I Action required to address this issue to avoid future risks

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
Jun 2016 Rev2-PS3-4		The Operator has provided final <i>Line Clearance and Restoration Guidelines</i> (T-KE-EHS-GUD-0003) Rev02 that provides guidance on management of soil erosion from line clearance activities.	The existing sediment and erosion control methods within the <i>Line Clearance and Restoration Guidelines</i> (T-KE-EHS-GUD-0003) should be updated to address the provision of specific training for field staff on the application of the Guidelines to prevent soil erosion to restore disturbed land surfaces.	Operator EHS Team Further update of SSA Procedure to address comments by Q4 2017	In Progress <i>Clearance and Restoration Guidelines</i> (T-KE-EHS-GUD-0003) revised to address these issues. Additional recommendations to improve these guidelines have been provided by the IMG.	Level I Action required to address this issue to avoid future risks
Performance Standard 4 Community Health, Safety, and Security						
		In the first IMG review a gap was identified in the documentation of health profiles of the potentially affected communities to understand community exposure and risk to disease, including the potential impact of project activities on local communities such as workforce interaction with communities.	A health profile for the affected communities should be developed to understand potential health risks and impacts to the community and local Project workforce.	Community Health profiles to be addressed in South Lokichar Development Project Phase 1 ESIA, due for completion in Q3 2018.	In Progress ESIA Terms of Reference for health baseline data gathering to be provided for IMG review prior to completion of the ESIA studies.	Level I Action required to address this issue to avoid future risks
Performance Standard 5 Land Acquisition and Involuntary Resettlement						
No open action items						
Performance Standard 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources						
Dec 2015 Rev1-PS6-1	<i>Baseline Biodiversity and Habitat Assessment</i>	To assist with compliance with IFC PS6 standards, it was identified by the IMG in the previous reviews that certain requirements would need to be included within the full-field development ESIA.	A comprehensive baseline assessment is required to define the biodiversity values that are likely to be present within the AOI and specifically the Development Project area. The baseline assessment should focus on species of conservation significance and their habitats.	Operator HSE Team The Natural/Modified Habitat mapping is to be completed by the end of Q1 2017. EOPS ESIA, due for	In Progress To be addressed in the South Lokichar Development Project Phase 1 ESIA. The mapping has been completed and will contribute to the baseline	Level I Action required to address this issue to avoid future risks

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
			<p>A spatial assessment of the distribution of Natural and Modified Habitats within the AOI and Development Project area is required. This assessment should define and justify the criteria used to spatially define the extent of natural and modified habitats.</p> <p>Using the updated baseline assessment and the definition of natural and modified habitats, critical habitat triggers should be screened and assessed for the AOI and Development Project area.</p>	<p>completion by end of Q4 2017.</p> <p>The full field ESIA for the South Lokichar Block will be completed by Q3 2018.</p>	and impact assessment sections of the EOPS ESIA.	
Dec 2015 Rev1-PS6-2	<i>Ecosystem Services Screening</i>	A specific assessment of Ecosystem Services is required to define the provisioning, regulating and cultural ecosystem services relied on by people within the AOI.	In conjunction with the social assessment being undertaken as part of the Development ESIA process, screening of ecosystem services relevant to the Development Project area should be undertaken. Where necessary, additional baseline data should be collected. The results of the assessment are to be incorporated into the full-field ESIA.	Operator HSE Team To be addressed in the South Lokichar Development Project Phase 1 ESIA report due by Q3 2018.	In Progress To be included in the TORs for the South Lokichar Development Project Phase 1 ESIA.	Level I Action required to address this issue to avoid future risks
Dec 2015 Rev1-PS6-3	<i>Conservation Significance Mitigation</i>	Baseline data on species of conservation significance within the AOI is required to inform the Critical Habitat assessment. Sufficient spatial definition within the Development Project area is required to define whether project activities would impact on Critical Habitats.	Based on the spatial definition of natural, modified and critical habitats and data in relation to the distribution and utilisation of species of conservation significance within the AOI, the mitigation hierarchy should be applied to the likely Development Project area. Specific mitigation measures should be developed to limit impacts on species of conservation significance	Operator HSE Team To be addressed in the South Lokichar Development Project Phase 1 ESIA report due by Q3 2018.	In Progress To be included in the TORs for the South Lokichar Development Project Phase 1 ESIA.	Level I Action required to address this issue to avoid future risks

Review Date/Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
			<p>and their habitats and incorporated into the EHS MPs.</p> <p>Residual impacts on biodiversity values and ecosystem services should be measured using an appropriate metric to demonstrate compliance with no-net-loss or net gain goals. If required, biodiversity offsets can be considered to assist in achieving the goals. Consultation with relevant stakeholders such as government agencies and NGOs should be undertaken as required.</p>			
Dec 2015 Rev1-PS6-4	<i>Biodiversity Action Plan</i>	The IMG noted during the first IMG review that several elements of IFC PS6 were being assessed through the current ESIA for Phase 1 of the South Lokichar Development Project.	If Critical Habitat is identified and impacted by the project, a Biodiversity Action Plan must be prepared in relation to the management of any critical habitats by the Operator.	Operator HSE Team To be addressed in the South Lokichar Development Project Phase 1 ESIA report due by Q3 2018.	In Progress	Level I Action required to address this issue to avoid future risks
Dec 2015 Rev1-PS6-5	<i>Invasive Species Management</i>	The existing invasive species management list is contained in the broader Kenyan Biodiversity Management Plan.	An Invasive Species Management Procedure should be produced to relate to site-specific requirements and incorporated into site specific EHS MPs.	Operator HSE Team The draft is to be finalised by Q4 2017	In Progress Draft procedure for <i>Management of Invasive Species (Rev2-PS6-11)</i> issued to IMG for review. The IMG has provided specific recommendations to improve the draft procedure.	Level I Action required to address this issue to avoid future risks
Jun 2016 Rev2-PS6-11		It is a requirement of IFC PS6 that the risk of introducing invasive species be assessed and managed, where appropriate, to reduce risks of further transmission and proliferation due to project	<p>The assessments of exploration activities using the SSA procedure are to address the transmission and management of invasive species.</p> <p>The draft Invasive Species Management Procedure should be</p>	Operator EHS Team The SSA and required mitigation to be completed prior to the commencement of	In Progress Site Specific Assessment Procedure Rev2 (T-KE-ESP-PRO-003) revised to address these issues.	Level I Action required to address this issue to avoid future risks

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
		related activities.	updated and operationalised.	further exploration activities in South Lokichar. The draft is to be finalised by Q4 2017	Recommendations provided by IMG to update this to reference revised <i>Management of Invasive Species procedure</i> (see below) Draft procedure for <i>Management of Invasive Species (Rev2-PS9-11)</i> issued to IMG for review. The IMG has provided specific recommendations to improve the draft procedure.	
Dec 2015 Rev1-PS6-6	<i>Decommissioning and Restoration</i>	Mitigation measures for the restoration of disturbed areas have been developed and are currently being implemented as part of the ESMP. These protocols include measures to reshape the land surface and seed/replant native vegetation.	The Decommissioning and Restoration Guidance and Reinstatement and Restoration Plan should be updated to incorporate best practice techniques for restoration, relevant success criteria, monitoring protocols, and mechanisms for continual improvement and contingency.	Operator EHS Team End of Q4 2017.	In Progress The Operator provided draft Line Clearance and Restoration Guidelines (T-KE-EHS-GUD-0003 Rev02). The IMG has provided recommendations to improve the Guidelines.	Level I Action required to address this issue to avoid future risks
Dec 2015 Rev1-PS6-7	<i>Supply Chain Sustainability Assessment</i>	The IMG noted during the first IMG review that several elements of IFC PS6 were being assessed through the current ESIA for Phase 1 of the South Lokichar Development Project.	An assessment of the supply chain to determine the sustainability of Natural Resources supplied should be undertaken and outlined in the full field ESIA.	Operator EHS Team To be addressed in the South Lokichar Development Project Phase 1 ESIA report due by Q3 2018.	In Progress Being undertaken as part of the FFD ESIA.	Level I Action required to address this issue to avoid future risks
Dec 2015 Rev1-PS6-8	<i>Monitoring and Evaluation Criteria</i>	The IMG noted during the first IMG review that several elements of IFC PS6 were being assessed through the current ESIA for Phase 1 of the South Lokichar Development Project.	Monitoring and evaluation criteria should be defined and incorporated into the EHS MS; site specific plans, BMP (if required) and relevant revised restoration plans.	Operator EHS Team To be addressed in the EHS MS, site specific plans and BMP (if required)	In Progress Being undertaken as part of the FFD ESIA.	Level I Action required to address this issue to avoid future risks

Review Date/Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
Jun 2016 Rev2-PS6-9	<i>Compliance with IFC Performance Standards in Exploration Blocks</i>	During the second IMG review, it was observed in the field and through review of documentation that there may be gaps in the application of IFC Performance Standard 6 for exploration activities in licence blocks where the block-wide ESIA has not fully addressed biodiversity issues. During the third IMG site visit, the IMG was informed that SSA Procedures will be applied to determine compliance with IFC PS6, including defining impacts to Natural Habitat and Modified Habitat.	For new Site Specific Assessments (SSA) and ESIA's undertaken for activities such as exploration drilling and/or full field developments within the existing licence blocks, a spatial assessment of Natural Habitat and Modified Habitat within the relevant project areas should be undertaken.	Operator EHS Team The Natural/Modified Habitat mapping is to be completed by the end of Q1 2017. EOPS ESIA using this data due for completion by Q4 2017.	In Progress A methodology to identify Natural and Modified Habitat in field is contained in the revised Site Specific Assessment Procedure Rev2 (T-KE-ESP-PRO-003). The mapping has been completed and will contribute to the baseline and impact assessment sections of the EOPS ESIA.	Level I Action required to address this issue to avoid future risks
Jun 2016 Rev2-PS6-10	<i>Restoration Activities</i>	There were a limited number of sites that had been rehabilitated to date but as the development project progresses there would be a requirement to have a more detailed procedure for site rehabilitation to reduce net loss of habitats and grazing areas. Line Clearance and Restoration Guidelines T-KE-EHS-GUD-0003 REV02 have been produced. Trial nursery facilities had been established at two locations in the South Lokichar blocks and local indigenous	Site restoration pilot schemes are to be progressed with technical assistance to investigate methods to improve and monitor site restoration. Adequate field implementation is required to ensure that staff are trained and are knowledgeable of the contents of the Guidelines.	Operator EHS Team Planting trials commence by the Q2 2017 Restoration Plan to be updated by end of Q4 2017.	In Progress Progress has been made on the establishment of site restoration activities in South Lokichar. IMG have provided recommendations to improve the draft <i>Emong Full Restoration Plan (T-KE-EHS-PLN-XXXX)</i>	Level I Action required to address this issue to avoid future risks

Review Date/Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
		plants had been propagated.				
Performance Standard 7 Indigenous People						
Dec 2015 Rev1-PS7-1	<i>Free Prior and Informed Consent for Land Access</i>	A gap was identified within the existing Land Access Procedure and Stakeholder Engagement Plan for the South Lokichar Development Project regarding documentation of FPIC.	<p>The Operator needs to formalise requirements to undertake FPIC through the revision of the Land Access Procedure for the development project to reflect FPIC requirements. The implementation of FPIC should ensure that the following is achieved and documented.</p> <ul style="list-style-type: none"> • Engagement and negotiation processes, including documentation of key milestones, agreements and feedback from the affected community. • Details of the community members involved in the FPIC process. • The affected communities are fully informed of the land access process, and objectives of FPIC. 	<p>Operator SP Team</p> <p>Existing Land Access Procedure (dated 20/05/2016) to be finalised reflecting any feedback on LAF.</p> <p>Approved SEP by end of Q1 2017.</p> <p>Approved LAF by end of Q4 2017.</p>	<p>In Progress</p> <p>These issues are addressed in the SEP (issued for use in March 2017) and the draft Land Access Framework.</p> <p>The finalisation of the Land Access Framework is pending review and agreement from the Government of Kenya.</p>	<p>Level I</p> <p>Action required to address this issue to avoid future risks.</p>
Performance Standard 8 Cultural Heritage						
No open Action Items						

6 CONCLUSIONS

6.1 ESAP REQUIREMENTS

This review presents an assessment of AOC progress with ESAP/ ESRS requirements, identifying those actions that have been completed, are in progress and are pending commencement of activities. A number of AOC ESG Framework documents have been produced and reviewed by the IFC. Project specific plans and procedures will be produced prior to any operations commencing in Block 9 or the Rift Basin Area Block. The ESAP/ESRS requirements relevant to the current and planned Tullow Kenya operations in South Lokichar are mainly closed, with some pending revisions to draft documents or completion of current ESIAs. For future JV-led activities additional site-specific plans and procedures may be required to address relevant ESAP and ESRS requirements. These will be identified through the Operator's Site Specific Assessment Procedure.

6.2 IFC PERFORMANCE STANDARDS REQUIREMENTS

The Operator is continuing to finalise and operationalise relevant management systems, plans, procedures and guidance to ensure effective identification and management of environmental and social risks. Key to this process has been the development, over the previous review period, of an Environmental and Social Management System and a more comprehensive Site Specific Assessment procedure and associated guidance. Overall the Operator's current activities are considered to meet the requirements of the IFC Performance Standards with finalisation of ongoing ESIA studies and full operationalisation of relevant management systems, plans, procedures and guidance required prior to commencement of EOPS and progress with FFD.

6.3 RECOMMENDATIONS FOR NEXT REVIEW

There are no specific AOC operated activities planned in Kenya and Ethiopia over the next six month review period, with decisions on potential future operations pending further geological data review. The ESG Framework documents, and any procedures that are developed for specific operations planned for 2018, will be reviewed within the next review period, along with an assessment of progress with the relevant AOC ESAP/ESRS requirements.

The focus of the next review is again likely to be on the South Lokichar Basin exploration and appraisal operations as well as the developing EOPS ESIA and the Full Field Development ESIA. A key element of this will be reviewing progress in finalising relevant systems, plans, procedures and guidance and embedding these as controlled EHS management documents.

Annex A

Meetings on Current Project
Activities and Progress
since Last IMG Review

PROJECT ACTIVITY AND PROGRESS UPDATES

DATE	ACTIVITY	ATTENDEES
27 July 2017	<p>A presentation was given by Tullow by video conference between the Tullow Kenya and Tullow London offices with attendance from the IMG team in person in London and by teleconference.</p> <p>Update briefing by Tullow</p> <ul style="list-style-type: none"> • Overall company update • E&A status update • EOPS status update • Pipeline status update • ESIA Updates - EOPS/FFD • Site Specific Assessments. • Site Restoration. • Land Access. • Water Resources. • Contractor Management / Grievance Mechanism. • Cultural Heritage • Security and Asset Protection. 	<p>Africa Oil Corp</p> <ul style="list-style-type: none"> • Alex Mayhook-Walker - Acting VP External Relations <p>Tullow Oil plc and Tullow Kenya BV</p> <ul style="list-style-type: none"> • Paul Mowatt - Environmental Manager - Kenya Developments • Oliver McCredie - Senior Social Performance Advisor • Patricia Arroyo - Senior Environmental Advisor • Gordon Scott - EHS Manager • Richard Boak - Water Resources Manager • Susan Muchiri - Land Access and Resettlement Manager • Bernard Ambasa - Head of Human Resources • Daniel Ogol - Lenders and Above Ground Risks Performance Lead • Kenneth Kamau - Environmental Lead • Peter Muriuki - Environmental Advisor <p>IMG Team</p> <ul style="list-style-type: none"> • Mark Irvine - Team Leader and Environmental Specialist • David Nicholson - Biodiversity Specialist • Wanjiku Githinji - Social and Health Specialist •
1 August 2017	<p>A video conference was held between AOC and the IMG to provide an update on AOC current activities and future plans as well as progress with ESAP/ESRS requirements.</p>	<p>Africa Oil, Kenya</p> <ul style="list-style-type: none"> • Donald Mahaga - General Manager • Linda Were - ESG Manager <p>IMG Team</p> <ul style="list-style-type: none"> • Mark Irvine - Team Leader and Environmental Specialist.

Annex B

List of Additional
Documents Provided by
AOC and Tullow Kenya
Relevant to Current
Activities

SOURCE/TOPIC	DOCUMENT TITLE
AOC ESG Framework documents	KE/ESG/FRM/CH V2/2016/1. Cultural Heritage Management Framework for Africa Oil Operations. Updated May 2017.
	KE/ESG/FRM/HR V2/2016/3. Human Resources Framework For Africa Oil Operations. Updated May 2017.
	KE/ESG/FRMV3/SE/2016/4. Stakeholder Engagement Framework For Africa Oil Operations. Updated May 2017.
	KE/ESG/FRM/LAFV2/2016/5. Land Access/ Acquisition Framework For Africa Oil Operations. Updated May 2017.
	KE/ESG/FRM/RP/2016/10. Staff Redundancy Procedure. Updated May 2017.
	KE/ESG/FRM/SFV2/2016/6. Security Framework For Africa Oil Operations. Updated May 2017.
	KE/ESG/FRM/BD/2016/8. Biodiversity Management Framework. Updated June 2017.
KE/ESG/FRM/IGM/2016/9. Internal Grievance Mechanism for Africa Oil Employees. Updated May 2017.	
Africa Oil Ethiopia Scopes of Work	Africa Oil Ethiopia B.V. Scope Of Work For Rapid Biodiversity Assessment and Hydrology Baseline Assessment for The Proposed Exploratory Drilling Operations in The Rift Basin Area Block. Dated 15/6/17.
	Africa Oil Ethiopia B.V. Scope Of Work For Environmental And Social Impact Assessment (ESIA) for the Proposed Exploratory Drilling Operations Along The Western Shore Of Lake Abaya in The Rift Basin Area Block. July 2017.
TKBV General EHS	T-KE-ESP-XXXXXXX -ESMS (003) Draft
	T-SEA-STN-0001 Non-Technical Risks Standard November 2016
	Organisational Structure Kenya Final 210317 version 3 0 (002)
	T-KE-ESP-PRO-003 Site Specific Assessment Procedure Rev2
	T-KE-ESP-STU-0002 - Ekales-C Exploration Well SSA Report
	T-KE-ESP-STU-0003- Etiir-A Exploration Well SSA Report
T-KE-ESP-STU-0004 - Etom-D Exploration Well SSA Report	
Biodiversity	T-KE-ESP-FRM-0001 Biodiversity - FINAL
	Draft Invasive Plant Species Management Framework
	T-KE-EHS-GUD-0003 - Line Clearance and Restoration Guidelines REV02.pdf
	Update 002 Emong Revegetation Project 07 2017_.pdf
	Revegetation Plan- Emong (002).docx
APEI EWSR report - 6th 17nth 2017 (003).docx	
Cultural Heritage	T-KE-EHS-PRO-0024 Cultural Heritage Management Procedure
	T-EHS-STD-0004 Cultural Heritage Standard (002) Block 10BA Fossil Avoidance Procedure Rev 4 March 2012
TKBV Stakeholder Engagement	T-KE-ESP-FRM-0002 Stakeholder Engagement Framework March 2017
TKBV Community Safety, Security & Human Rights	MOU Between Tullow Kenya B.V and National Police Service signed in May-June 2017
TLBV HR/Contracting	Contractor Non Technical Risks Management - Draft 1