

# Independent Monitoring Group

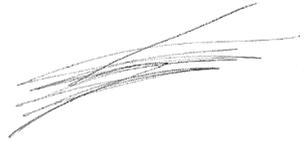
Tenth HSEC Monitoring Review

31 March 2022

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## Acronyms and Abbreviations

Name	Description
AOC	Africa Oil Corporation
CDP	Community Development Plan
CPF	Central Processing Facility
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EOPS	Early Oil Pilot Scheme
ESAP	Environmental and Social Action Plan
ESRS	Environmental and Social Review Summary
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESPP	Environmental and Social Performance Plan
ESG	Environmental and Social Governance
FEED	Front End Engineering Design
FDP	Field Development Plan
FID	Financial Investment Decision
FPIC	Free Prior Informed Consent
GHG	Green House Gases
GIIP	Good International Industry Practice
GoK	Government of Kenya
HR	Human Resources
HSEC	Health, Safety, Environment and Community
IFC	International Finance Corporation
IMG	Independent Monitoring Group
KJV	Kenya Joint Venture
LALR	Land Acquisition and Livelihood Restoration
LLCOP	Lokichar to Lamu Crude Oil Pipeline
NEMA	National Environmental Management Authority
PAP	Project Affected People
PS	Performance Standard
RAP	Resettlement Action Plan
SASB	Sustainability Standards Accounting Board
SEP	Stakeholder Engagement Plan
SLIP	Supplementary Lenders Information Package
TCFD	Task Force on Climate Related Financial Disclosures
TCG	Turkana County Government

## EXECUTIVE SUMMARY

*Africa Oil Corporation* (AOC) is a Canada based oil and gas exploration and development company with exploration and development assets in Kenya, exploration, development and producing assets offshore Nigeria, as well as a portfolio of exploration assets in Guyana, Namibia, South Africa and in the Senegal/Guinea Bissau Joint Development Zone. AOC holds its interests through direct ownership of concessions and through its shareholdings in investee companies (Prime Oil & Gas BV, Africa Energy Corp, Eco (Atlantic) Oil & Gas Ltd and Impact Oil and Gas Ltd).

The Equity Subscription Agreement between AOC and the International Finance Corporation (IFC) for oil and gas exploration, appraisal and development activities requires AOC, and its Joint Venture partners, to conform to the IFC Performance Standards (PS) on Environmental and Social Sustainability (2012) and fulfil the requirements of an agreed Environmental and Social Action Plan (ESAP). The investment requires the establishment of an Independent Monitoring Group (IMG) to undertake periodic reviews of progress with the ESAP requirements and conformance with the IFC PSs. The initial IMG review was conducted in December 2015 and this report is the tenth IMG review.

Most of the current ESAP actions are closed with a small number pending determination of the submitted Project Oil Kenya (POK) ESIA and the development of associated environmental and social management documentation, as described below.

POK is the name given to the South Lokichar field development project in north-west Kenya, operated by AOC's Joint Venture partner, Tullow Kenya BV. The revised POK field development plan is currently being reviewed by the Government of Kenya and activities on site are at a very low level (maintenance of security at existing facilities and ongoing stakeholder engagement activities) and no current exploration, appraisal or site restoration work being undertaken. A number of legacy issues are also being addressed by the POK JV team, including the consolidation and storage of exploration drilling cuttings and wastes at a single site (Twiga 1 well site) and working with the Turkana County Government to develop a sustainable strategy for the provision of community water supplies within Turkana County.

The POK midstream component (pipeline) has been approved by the Kenyan National Environmental Management Authority (NEMA) and the Environmental and Social Impact Assessment (ESIA) for upstream component is currently undergoing review by NEMA. A separate ESIA for the water supply pipeline from the Turkwel reservoir to the upstream facilities was submitted to NEMA for review and determination in February 2022.

A Supplementary Lender Information Package, to address specific IFC PSs and related lender requirements for POK is planned for the second half of 2022 with a Final Investment Decision (FID) targeted for the end of 2022. An overall POK Environmental and Social Performance Plan (ESPP) will also be produced by the end of 2022, covering the ESIA commitments, NEMA EIA licence conditions, IFC PS requirements and other lender requirements.

AOC continues to work through Prime Oil and Gas to influence the management of the producing assets offshore Nigeria, particularly with respect to GHG emissions. The AOC 2021 Sustainability Report, following the Sustainability Standards Accounting Board reporting standards and aligned with the requirements of the Task Force on Climate Related Financial Disclosures was published on 28<sup>th</sup> February on the AOC website.

The focus of the next IMG review will be dependent on the level of activity at existing assets and future investment decisions. The further development of POK's non-technical risk management plans as it moves towards FID, AOC's ongoing oversight of its non-operated assets, and further development of AOC's ESG Strategy and Energy Transition Strategy are likely to be key areas. The next review is currently scheduled for the third quarter of 2022.

## 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. The agreement included a requirement for AOC to conform to the IFC Performance Standards (PS) on Environmental and Social Sustainability and to undertake specific actions detailed in an agreed Environmental and Social Action Plan (ESAP). The ESAP was developed by the IFC based on its Environmental and Social Review Summary (ESRS) of AOC's activities produced 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) <sup>(1)</sup>. 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 with respect to IFC's environmental and social requirements.

Reviews are scheduled to be undertaken every six months during exploration and development phases, and annually during production phases. Some of the scheduled reviews have been affected by delays due to site security issues, Covid-19 restriction and project design delays. The previous IMG reviews were undertaken in:

- December 2015 (including site visit to South Lokichar and Block 12A);
- July 2016 (including site visit to South Lokichar and Block 12A);
- January 2017 (including site visit to South Lokichar);
- July 2017 (desk based due to travel restrictions associated with elections in Kenya);
- May 2018 (including site visit to South Lokichar);
- December 2019 (delayed due to reduced levels of activity on site and included site visit to Early Oil Pilot Scheme and oil transport);
- February/March 2020 (including site visit to South Lokichar and desk based reviews of upstream Phase 1 development and midstream pipeline project Environmental and Social Impact Assessments (ESIA) <sup>(2)</sup>);
- November/December 2020 (desk based due to travel restrictions and a low level of site activity at South Lokichar due to the Covid-19 pandemic); and.
- July/August 2021 (primarily desk-based and included a review of the revised draft upstream Project Oil Kenya (POK) ESIA and a site visit was undertaken to observe community consultations on the ESIA).

This report covers the findings of the tenth review undertaken in February 2022.

### 1.2 Scope of the Review

Previous reviews have focussed on AOC's interests in Kenya and, to a lesser extent, Ethiopia. AOC's current interests in East Africa are the non-operated assets (Blocks 13T, 10BA and 10BB in the South Lokichar Basin, north-west Kenya) operated by a JV partner, Tullow Kenya. AOC currently have no other non-operated or operated interests in Kenya and Ethiopia as AOC and JV Partners have relinquished its interests in Block 12A (2017) and Block 9 (2018) in Kenya and the Ethiopian interests (2019), as reported in previous reviews.

From late 2018, AOC broadened its investment portfolio and now has interests across the oil and gas exploration, development and production cycle, including non-operated assets in Nigeria, Namibia, South Africa, Senegal/Guinea Bissau Joint Development Zone and Guyana (as described in

(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).

(2) The Term ESIA is used here, however, it is noted that under Kenyan legislation the term EIA is used.

Chapter 2). Previous reviews have included an assessment of AOC's updated Environmental and Social Governance (ESG) systems, policies, standards of operation and performance reporting requirements that apply to these and potential future non-operated assets, as well as to assets where AOC may have an operator role.

The current review was desk-based and provides an update on the previous reviews. For the Project Oil Kenya (POK) development activities in South Lokichar, AOC has provided documentation related to the revised water supply pipeline and a number of legacy issues such as drilling waste management and community water supply arrangements. For AOC's non-operated assets, an update on the status of activities is provided as well as progress with AOC's ESG strategy.

### 1.3 Objectives

The overall objective of the IMG reviews is to identify areas of non-conformance <sup>(1)</sup> within the review framework and to make recommendations for corrective actions, or improvements in line with Good International Industry Practice (GIIP).

The current review covers the following areas.

- Overview of status of AOC's non-operated interests.
- Progress against the current AOC ESAP requirements.
- Update on status of POK, including the submitted ESIA's, planned Supplementary Lender Information Package (SLIP) and Non-Technical Risk Management strategy. A review of management of ongoing site issues is also included (waste management and community water supply).
- Update on Corporate ESG status and current activities.

### 1.4 Approach

The approach taken for the current review was as follows.

- Attend an inception meeting to receive a briefing on AOC current and planned activities.
- Conduct a desktop review of provided documents (documents submitted for this review are listed in Appendix A).
- Request clarifications or further information from AOC and report the review findings.

Each IMG report provides updated information on assets and project progress and, where relevant, an update on previous observations/findings and any new observations/findings. Where appropriate, information in the previous IMG reviews is referenced or summarised to avoid unnecessary repetition. The review methodology and action tracking procedure are presented in Chapter 3.

### 1.5 Review Period

This review covers the activities in progress between the ninth review in July/August 2021 and the current review in February 2022. Where reference is made in this report to the 'next review period', this would cover the approximately six-month period from March 2022 to the next review currently scheduled for the third quarter (Q3) of 2022. Due to the low level of on-site activities and the ongoing travel restrictions related to the Covid-19 pandemic, it not currently known if field visits will be possible for the next review.

### 1.6 IMG Review Team

The ERM IMG team for the current review comprised consultants covering the following skills specified in the IMG Scope of Work.

- Mark Irvine: Team Leader and Environmental Specialist.

(1) The term 'compliance' relates to specific legal and regulatory measures or contract requirements, whereas the term 'conformance' relates to a standard that is outcome-based.

- Kelly Horton: Social Specialist
- Peter Wright: Biodiversity Specialist.

## 1.7 Limitations

The findings in this report are based on the Scope of the Review 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 discussions.

ERM has used information provided by AOC, JV Partners and their representatives 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 on 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.

## 1.8 Report Structure

The remainder of this review report is structured as follows.

- Chapter 2 summarises the key AOC and JV assets and status of activities.
- Chapter 3 outlines the assessment framework and applicable standards.
- Chapter 4 presents an assessment of the progress against the AOC ESAP requirements.
- Chapter 5 presents an update of the findings of the review of POK with respect to the IFC Performance Standards, along with the actions required for conformance and recommendations to meet GIIP.
- Chapter 6 presents a brief update on AOC's Corporate ESG strategy and related activities.
- Chapter 7 presents the conclusions and recommendations for the next review.

The review is supported by the following appendix.

- *Appendix A: Additional Documents Provided by AOC for the Current Review.*

## 2. AOC AND JV ASSETS AND CURRENT ACTIVITIES

### 2.1 Overview of Non-Operated Interests

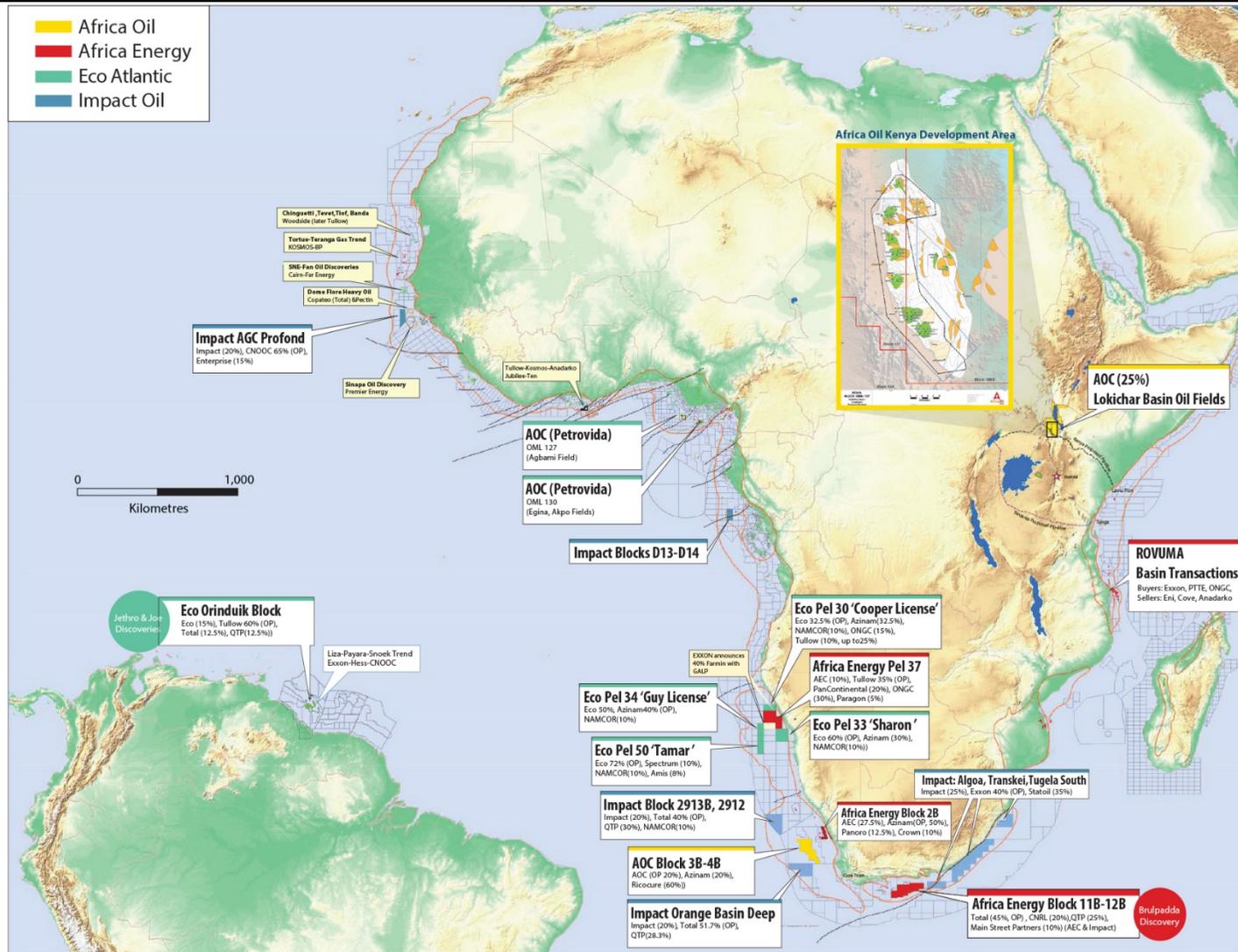
A summary of AOC's and its JV Partners interests is provided in Table 2.1 and illustrated in Figure 2.1. The Canje block offshore Guyana is not shown. Further details are provided in the following sections with more detailed maps, where available. Note that Africa Oil SA has operator interests in two blocks in South Africa, based on exploration rights.

**Table 2.1 AOC Non-Operated Interests**

Company and AOC Relationship	AOC Shareholding and date of entry	AOC Influence	Country	Block/Fields	Company Shareholding	Operator
<b>Exploration Assets</b>						
Africa Oil Kenya	100%	Wholly owned	Kenya	10BA, 10BB, 13T	25%	Tullow Kenya
Africa Oil SA Corp	100%	Wholly owned	South Africa	3B/4B (Exploration Rights)	20%	AOC
Africa Energy Corp	19.9% Jun 2021	Independent Director	South Africa	11B/12B (Exploration Rights)	10%	Total
				2B (Exploration Rights)	27.5%	Azinum Ltd*
			Namibia	PEL 37	14.62%	Tullow
Impact Oil and Gas	30.9% May 2018	AOC has Non-Executive Director on Board	Namibia	2913B 2912	20% 18.9%	Total
			South Africa	Algoa & Transkei, Area 2 Orange Basin Deep	50% 90% 22.22%	Shell Impact O&G Total
			Senegal/ Guinea Bissau	AGC Profond	20%	CNOOC
Eco (Atlantic) Oil and Gas Ltd	19.9% Jun 2021	Independent Director	Guyana	Orinduik Block	15%	Tullow
				Canje Block	1.75%	ExxonMobil
			Namibia	Four blocks (Cooper, Sharon, Guy, Tamar)	50-80%	Eco Atlantic and Azinam
<b>Producing Assets</b>						
Prime Oil and Gas	50% Jan 2020	AOC has Director on Board	Nigeria	OML 127 (Agbami producing field)	8%	Chevron
				OML 130 (Akpo and Egina producing fields)	16%	Total

Sources: AOC website, February 2022, AOC Report to Shareholders November 2021. Operator websites February 2022. \*Sale to Eco-Atlantic pending.

Figure 2.1 Current AOC JV Assets



Source: AOC website accessed February 2022.

## 2.2 Africa Oil Kenya

Africa Oil Kenya is wholly owned by AOC. Non-operated assets in Kenya include Blocks 10BA, 13T and 10BB in Turkana County, in north-west Kenya. The assets are operated by Tullow Kenya (50%) in a JV with AOC (25%) and Total (25%), named the KJV later in this report. Activities in blocks 13T and 10 BB described in Section 2.2.1 below.

The extended exploration licence for Block 10BA runs to 26 April 2022. No exploration work is planned in block 10BA prior to this date and a licence extension may be applied for by the KJV in due course.

As stated in Section 1.2 above and reported in previous reviews, AOC no longer have an interest in Blocks 9 and 12A in Kenya.

### 2.2.1 South Lokichar Basin Exploration, Appraisal & Development

For the purposes of this report, the South Lokichar Basin comprises Blocks 13T and 10BB. 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 an update of the current activities for the upstream project and the associated midstream component, known as Project Oil Kenya (POK).

The permitted phase of exploration and appraisal activities within Blocks 10BB and 13T in South Lokichar commenced on 19<sup>th</sup> of September 2015 and expired on 18<sup>th</sup> September 2020. There were a number of licence extensions related to Full Field Development Plan revisions and the Covid-19 pandemic. The current exploration and appraisal licence ended on 31 December 2021. The upstream development team has been demobilised, with a small care and maintenance team in place.

### 2.2.2 South Lokichar Field Development Project

The POK Field Development Plan for the South Lokichar Field Development has been redefined and now includes the discoveries at Twiga, Amosing and Ngamia in block 10BB and 13T, as well as additional wells from Ekales/Agete and Etom. This will comprise a series of well pads, interconnecting flowlines, a Central Processing Facility (CPF), and support facilities and infrastructure (e.g. roads, logistics base/storage areas, waste storage sites, and power and water supply). The revised Field Development Plan was submitted to the Government of Kenya for approval in December 2021 and is pending approval (expected in Q2 2022). Figure 2.1 illustrates the redefined Project schematically.

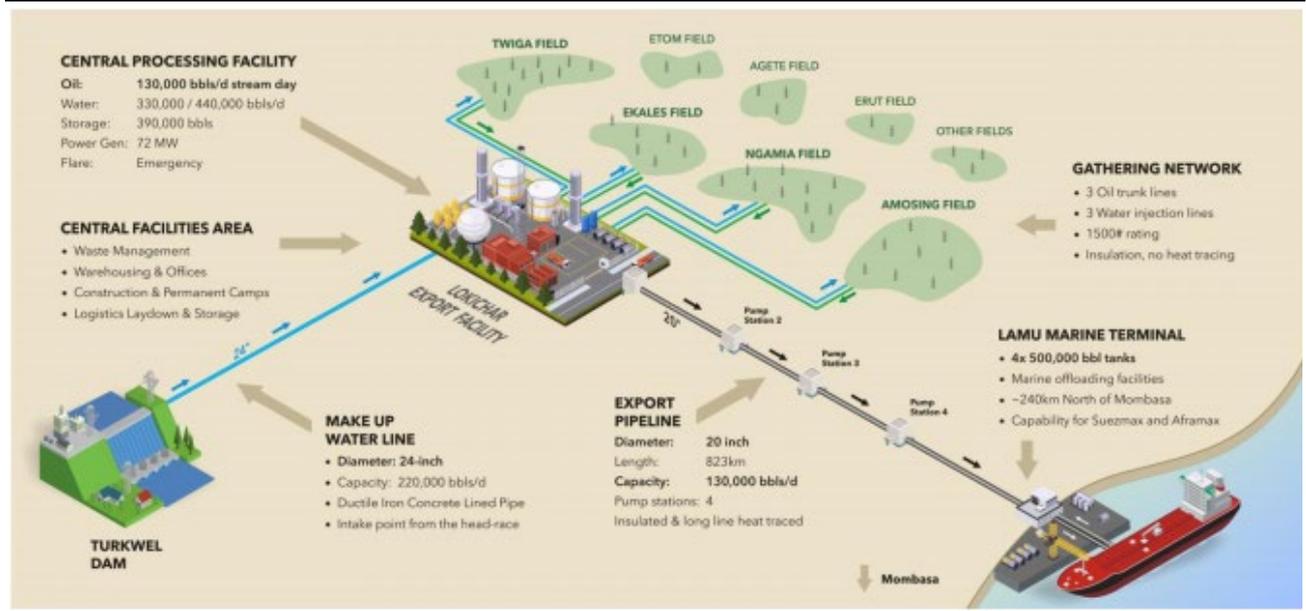
The project Final Investment Decision (FID) is targeted for the end of 2022. The KJV is evaluating options to progress the project, including the possibility of bringing additional shareholders into the JV. Subject to FID, the issuing of tender packages to potential contractors, bid evaluation and contractor selection for the Project Management Company (PMC), Engineering, Procurement and Construction (EPC), Drilling, and Operations and Maintenance Services contractors would be undertaken in early 2023.

The integrated development of these six fields in the South Lokichar Basin is planned over two phases, with first oil from each expected from between 3 and 7 years following FID. These phases include:

- Phase 1: Amosing and Ngamia at year 3 and Twiga at year 4.
- Phase 2: Ekales and Agete at year 5 and Etom at year 7.

The upstream ESIA, to meet Kenyan regulatory requirements, for POK was submitted to the Kenyan National Environmental Management Authority (NEMA) in September 2021 and determination is pending.

**Figure 2.2 South Lokichar FFD Project and Pipeline Route: Updated Schematic**



Source: AOC Corporate Presentation November 2021.

### 2.2.2.1 Water Supply

The Turkwel reservoir was selected as the project water source for well pressure control (water injection) following an evaluation of options (reported in previous IMG reviews). The originally proposed pipeline route was revised prior to the finalising of the FFD ESIA therefore a separate ESIA for the revised pipeline route from the reservoir to the project site and community offtake infrastructure was produced and submitted to NEMA in February in 2022.

### 2.2.3 Lokichar to Lamu Crude Oil Pipeline

The Lokichar to Lamu Crude Oil Pipeline (LLCOP) is planned from the CPF at South Lokichar to a marine export terminal to be built at the Port of Lamu. Under the 2017 Joint Development Agreement, oversight and governance is provided by a Pipeline Steering Board comprising representatives of the KJV and the Government of Kenya that provide personnel and other resources to the Pipeline Project Management Team. AOC, as part of the steering board and project management team is therefore able to provide advice and has some influence over how activities are planned and undertaken.

An ESIA for LLCOP was submitted to NEMA in November 2019 and an addendum issued in March 2020 to address design and pipeline route changes. Following a series of public hearings and NEMA review, an EIA licence was granted to the KJV on 1 November 2021. The licence has a series of 101 conditions attached to it covering general, construction, operations, notifications and decommissioning requirements.

The Government of Kenya (GoK) LAPSSSET Corridor Development Authority, via the National Lands Commission (NLC), is leading the land access and stakeholder engagement for the pipeline, as well as the upstream land requirements. Work by the NLC to survey and gazette the required land along the pipeline route up to the Turkana County border has been completed. Completion of the work in Turkana was delayed due to Covid-19 access restrictions in 2020 and 2021. AOC has reported that the gazetting process has now been completed.

### 2.2.4 Supplementary Lender Information Package and ESPP

POK comprises the upstream, including the water supply, and mid-stream elements of the project. To address gaps with respect to lender requirements for the whole project, KJV is planning to undertake a Supplementary Lender Information Package (SLIP) report focussing on conformance with the IFC Performance Standards and associated World Bank guidance, and the Equator Principles (IV) requirements. This is planned for the second half of 2022. In parallel to this, an overall POK ESPP will be produced by the KJV incorporating all the project commitments and requirements from the ESIA's, NEMA EIA licence

conditions and lender standards requirements. Further details of the SLIP and ESPP are provided in Chapter 5.

### 2.2.5 Summary of Activities in South Lokichar

A summary of the status and main activities underway or planned in south Lokichar described above are presented in *Table 2.2*.

**Table 2.2 Status and Current Activity in South Lokichar Basin**

Licence Block	Status	Current Activity
Blocks 13T and 10BB (South Lokichar Basin), Kenya	Exploration and appraisal licence ended at the end of 2021 for blocks 13T and 10BB.	No current exploration and appraisal activities other than care and maintenance of existing well pads.
	The revised POK Field Development Plan was submitted to GoK in December 2021 for review. Comment on the revised plan is expected from the GoK within Q1 2022.	No current development activities.
	Upstream ESIA was submitted in September 2021 for NEMA review.	Drilling wastes have been consolidated at the Twiga 1 well site, pending FID and construction of an integrated waste management centre (IWMC) facility at the proposed CPF.
	ESIA for water pipeline submitted in February 2022 for NEMA review.	Community water supply strategy being developed with the Turkana County Government (TCG)
	FID is targeted for the end of 2022 and construction is scheduled to take place over a 36-month period from FID.	Ongoing Stakeholder engagement to maintain relationships, support the ongoing activities and register grievances.
	Joint Development Agreement with GoK to progress export pipeline from South Lokichar to Port of Lamu.	Support being provided to the NLC on completing the land survey and gazetting process.
	Midstream EIA licence issued in November 2021, along with licence conditions.	KJV reviewing EIA licence conditions in preparation for the development of the ESPP.
	A POK Supplementary Lender Information Package to meet IFC PSs and an Environmental and Social Performance Plan are planned.	Expression of Interest issued, tendering planned for Q2 2022 and work to be completed on SLIP by end of 2022.  KJV to develop ESPP by end of 2022.

### 2.3 Africa Oil SA Corp (South Africa)

Africa Oil SA Corp, owned by AOC, has a 20% participating interest in the Exploration Rights for Block 3B/4B, offshore South Africa, and became the Operator for the block in February 2020; however, this role is currently limited to the desk-based review and evaluation of previously acquired seismic survey data (see Figure 2.1 and Figure 2.3).

### 2.4 Africa Energy Corp (South Africa & Namibia)

AOC has an approximate 19.9% interest in Africa Energy Corp. Africa Energy has a 10% interest in the Exploration Rights for Block 11B/12B, offshore South Africa, where Total is the operator (see Figure 2.1 and Figure 2.3). Following discoveries in 2019 (Brulpadda) and 2020 (Luiperd) the exploration licence has been extended to September 2022.

Africa Energy currently has a 27.5% participating interest in the offshore Exploration Right for Block 2B, offshore South Africa where Azinum is the operator (see Figure 2.1 and Figure 2.3). Spudding of an exploration well in the Gazania prospect is scheduled for Q4 2022.

Africa Energy also has a 10% interest in PEL 37 offshore Namibia where Tullow is the operator.

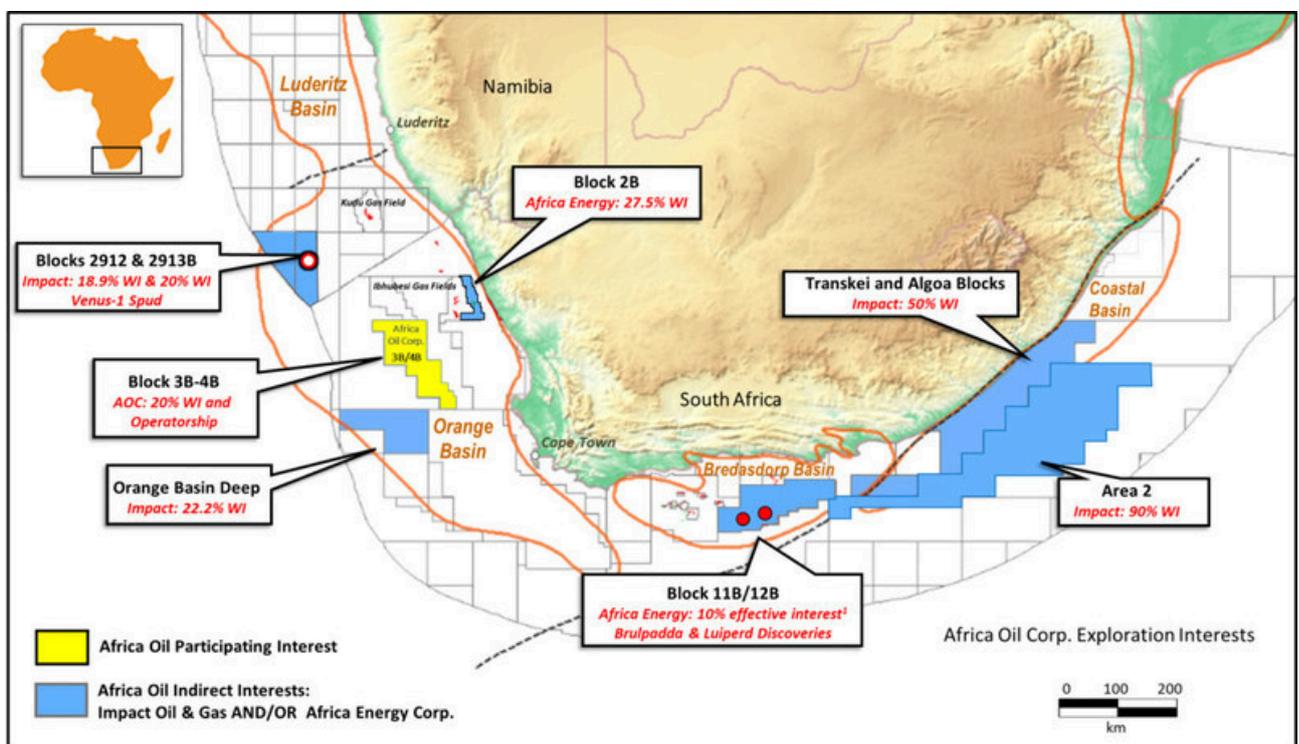
## 2.5 Impact Oil and Gas (Namibia, South Africa and Senegal/Guinea Bissau)

AOC has a 30.9% interest in Impact Oil and Gas that has a 20% interest in block 2913B and an 18.9% interest in block 2912 offshore Namibia, where Total is the operator. The Venus well spudded in November 2021 and a discovery of light crude was declared on 20<sup>th</sup> February 2022. Appraisal work is now planned.

Impact Oil and Gas has interests in three blocks offshore South Africa: 90% in Area 2 (Impact Oil and Gas is Operator), 50% in Algoa & Transkei (Shell is Operator) and 22.22% in Orange Basin deep (Total is Operator) (see Figure 2.1 and Figure 2.3).

Impact Oil and Gas also has interests in the CNOOC Operated AGC Profond Block in the Senegal/Guinea Bissau Joint Development Zone (see Figure 2.1 above).

**Figure 2.3 Offshore South Africa and Namibia Assets**



Notes:

<sup>1</sup> Africa Energy has signed definitive agreements that, subject to completion, will increase its effective interest in Block 11B/12B to 10% from 4.9%.

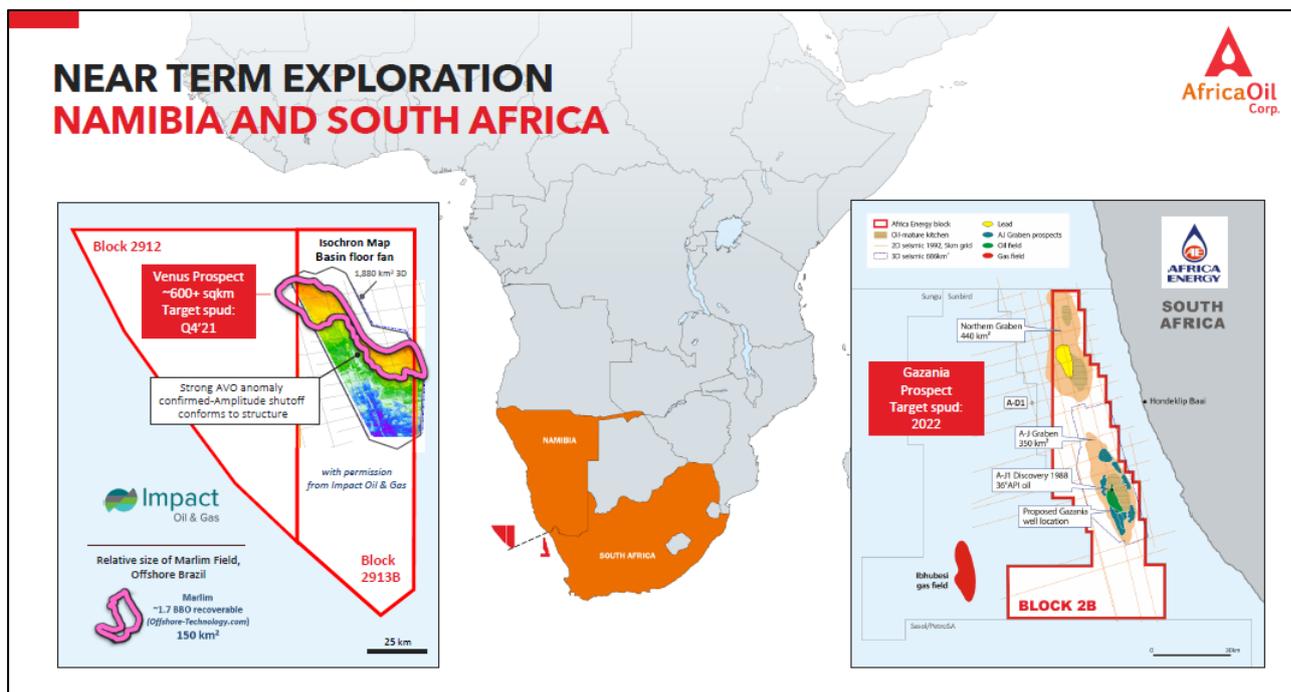
Source: AOC Corporate Presentation November 2021.

## 2.6 Eco (Atlantic) Oil and Gas Ltd (Guyana and Namibia)

AOC has an approximate 18.4% interest in Eco (Atlantic) Oil and Gas Ltd, which has a 15% interest in the Orinduik block, offshore Guyana. The operator is Tullow. Two discoveries were made in 2019 (Jethro-1 and Joe-1 wells), and there is potential for further exploration and appraisal wells under current permits. Eco-Atlantic also has exploration interests in the Canje Block through a 10% holding in JHI Associates, which has a 17.5% interest in the block (see Figure 2.1). ExxonMobil is the operator. The Sapote-1 exploration well was drilled in 2021 but was unsuccessful. A new programme of exploration drilling is being planned from 2022.

Eco-Atlantic also has four blocks offshore Namibia (see Figure 2.1 and Figure 2.4).

Figure 2.4 Offshore Western South Africa and Namibia Assets



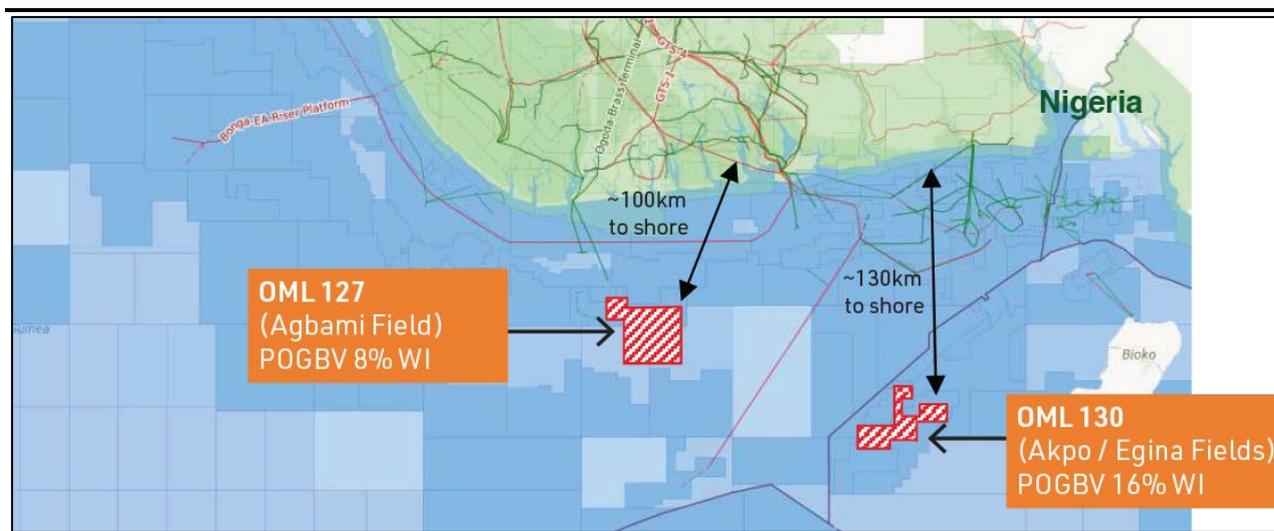
Source: AOC Corporate Presentation November 2021.

## 2.7 Prime Oil and Gas BV (Nigeria)

AOC holds a 50% non-operated interest in Prime Oil and Gas that has non-operator working interests in three FPSO based deep-water producing assets offshore Nigeria. These are listed below and shown in Figure 2.5.

- Block OML 127: Agbami field operated by Chevron (AOC has approximately a 4% interest as part of Prime’s approximately 8% interest).
- Block OML 130: Egina and Akpo fields operated by Total (AOC has approximately an 8% interest as part of Prime’s approximately 16% interest).

Figure 2.5 Offshore Nigeria Assets



Source: AOC website November 2020 (update not available from November 2021 corporate presentation)

### 3. ASSESSMENT FRAMEWORK AND METHODOLOGY

#### 3.1 Assessment Framework

The IMG review of AOC's and its JV partners' plans and activities was undertaken through a combination of document review, corporate presentations and email exchanges.

The assessment was undertaken against the following environmental and social standards.

- Relevant environmental and social laws and regulations of the host country in force at the time of the assessment.
- AOC's agreed ESAP requirements (disclosed by the IFC on 31 August 2015).
- IFC Performance Standards on Environmental and Social Sustainability (2012) and related policies and guidance, 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 the following.

- General Environmental, Health and Safety General Guidelines (April 2007).
- Environmental, Health, and Safety Guidelines for Onshore Oil and Gas Development (April 2007).
- Environmental, Health, and Safety Guidelines for Offshore Oil and Gas Development (June 2015).
- The proposed pipeline along the LAPSSET corridor from South Lokichar to Lamu is considered as an associated facility as it is required for the upstream project to be viable and would not be developed without the upstream project. With respect to such third party development, PS1 (paragraph 9) states:

*In the event of risks and impacts in the project's area of influence resulting from a third party's actions, the client will address those risks and impacts in a manner commensurate with the client's control and influence over the third parties, and with due regard to conflict of interest.*

The draft ESIA's that were provided to the IMG for previous reviews were reviewed against the Kenya Environmental Management and Coordination (Impact Assessment and Audit) Regulations (EIAAR) (2003) (as amended in 2016 and 2019) and associated guidance.

Regarding AOC's non-operated interests in a broader portfolio of projects, it is recognised that the application of its revised ESG systems, policies and standards of operations to these assets and projects is limited by what the Operator is willing and able to implement.

#### 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 on 2 February 2022 with a video-conference link to AOC's offices in London and Nairobi. Copies of presentations and related documents were provided prior to and after the presentations (see below).

- Activities were evaluated against the assessment framework to determine compliance with national laws and regulations, corporate requirements, and conformance with lender requirements.

### 3.2.2 Document Review and Presentations

HSEC documents covering AOC's corporate management plans and the KJV operational policies, procedures and plans were provided during the previous IMG reviews with updated and additional documents provided for the current IMG review. Details of the documents provided for the current review are presented in Appendix A. The documents submitted for the previous IMG reviews are listed in the previous reports.

An operational update was presented to the IMG by AOC outlining operational and HSEC issues, and management plans.

These covered the following main areas.

- Overview of AOC's current and planned operations and investments.
- POK update, including water pipeline ESIA, midstream EIA Licence, SLIP Scope of Work, waste management, community water supply issues, stakeholder engagement plans, and approach to non-technical risk management and the planned development of the ESPP.
- Update on AOC Corporate ESG strategy and activities.

The status of the findings from the ESAP review and the HSEC performance, based on previous findings that remain open, are rated and evaluated according to the categories presented in *Table 3.1* and *Table 3.2*.

For the review of AOC's ongoing development and implementation of its AOC ESG strategy related to its other non-operated interests, these have not been assigned a rating; however, where relevant, recommendations are made with respect to conformance with the IFC Performance Standards, related guidance and GIIP (see Chapter 6).

**Table 3.1 Performance Status Ratings**

Performance 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	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 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 period.	Workplan to be completed with an agreed 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 conformance. Closed items are shown on the ESAP items to demonstrate progress. Closed items are removed from the PS Conformance Actions

**Table 3.2 Performance Status 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
Requirement not met – Level II	Issue or situation not consistent with Applicable Standards or Company commitments that has not yet resulted in clearly identified damage or irreversible HSEC impacts, but which requires immediate corrective action to prevent risk of impact to resources or receptors.  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.	Level II Non Conformances will generate a corrective action request, and will be recorded.  Level II Non Conformances may result in a recommendation to 'Stop Work', in those situations where work activity presents on-going HSEC risks.
Requirement not met – Level III	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 HSEC impacts, and which requires immediate corrective action.  Action that indicates intentional disregard for Applicable Standards or Company commitments that has not necessarily resulted in a significant impact, generally requiring systems-level corrective action.	Level III Non Conformances will result in a recommendation to the Company to 'Stop Work', which will be reported to IFC.  The Company will agree a time-bound Action Plan to address the non-conformance to the satisfaction of the Independent Monitoring Group.

## 4. ENVIRONMENTAL AND SOCIAL ACTION PLAN

### 4.1 Conformance with Current ESAP Requirements

The current ESAP was developed in 2015 and focused on planned and potential operations in Ethiopia and Kenya. As discussed in Chapter 2, AOC has relinquished its Ethiopian interests, has no current operated assets in Kenya and has recently invested as minority shareholder and non-operator in other geographies. The current review assesses progress with the remaining open ESAP requirements, including providing updated planned completion dates.

Table 4.1 presents the IFC ESAP requirements, the tasks identified to be completed and status of actions. For the purposes of the current ESAP, the requirements relating to Ethiopia have been assigned as 'closed'. The ESAP requirements relevant to the current and planned POK operations in South Lokichar are mainly closed, with some assigned as 'in progress', pending finalisation of documents or approval of ESAs.

The 2015 ESAP was developed following the ESRS undertaken by the IFC. The ESRS also had additional actions for AOC to undertake. Progress against these were addressed in previous IMG reviews. The existing ESAP may be updated by the IFC in the future to reflect the changes in AOC's asset portfolio.

**Table 4.1 Evaluation of ESAP 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		Closed	Training process established and training undertaken
ESAP 1.2	(ii) hiring an Environmental, Social and Governance Manager.		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.		Closed	A SEP Framework document was produced by AOC and approved by IFC. The Ethiopia block have now been relinquished.
			Pre-FID phase SEP	For the South Lokichar Basin FFD Project, Tullow Kenya prepared a Stakeholder Engagement Framework and Pre-Development Stakeholder Engagement Plan. These were finalised following review by the IFC. POK updated this to an Upstream Stakeholder Engagement Plan in June 2021.
		Q4 2022	In Progress	A draft POK SEP was produced in January 2022 and is currently undergoing review by POK. It covers the up-stream and mid-stream project elements and included an Action Plan for the pre-FID phase in 2022. A SEP for the post FID phase will be developed by the end of 2022 as part of the POK ESPP.
ESAP 2.2	Company to prepare and submit ESIA's to IFC for review and approval – undertaken per project.		Closed	An ESIA for potential drilling on the west coast of Lake Abaya in Ethiopia was completed in Q2 2018. The Ethiopian Blocks were relinquished
				For the South Lokichar Basin development, Tullow Kenya undertook an ESIA for the Early Oil Production System (EOPS) in Q4 2018
			Closed	The POK ESIA and Supplementary Assessment is addressed under ESAP 7
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		Closed	For the exploration phase of the South Lokichar Basin development, Tullow Kenya has prepared a <i>Stakeholder Engagement Framework, Pre-Development Stakeholder Engagement Plan and Land Acquisition and Resettlement Framework</i> that outlined the approach required to achieve and document FPIC based on the definition of the project footprint and specific impacts. These were finalised following approved by the IFC. For future phases of the project, the FPIC process will be further developed and agreed with the IFC.

Index	Task Title & Description	Anticipated Completion Date	Status	Discussion
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		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.
	(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		Closed	Tullow Kenya follows national law and conformance with IFC requirements regarding retrenchment as evidenced in relevant HR procedures that provided during previous IMG reviews.
	(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.		Closed	Framework document has been produced and approved by IFC.
		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.		Closed	Framework document has been produced and approved by IFC.
			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).		Closed	<b>Framework document has been produced and approved by IFC.</b>
		Q4 2022	In Progress	A POK Upstream Land Access Strategy was drafted in March 2020 and the IFC provided comments on the draft in September 2020. This document refers to requirements to develop an Upstream Resettlement and Livelihood Restoration Framework and Resettlement (draft produced in February 2021) and Livelihood Restoration Plan prior to FID (planned for 2022). As part of this process detailed project specific plans, including procedures for any supplementary benefits and entitlements, will be developed as part of the POK ESPP.
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.		Closed	Compensation Plan redesigned and the Management of Change provided to IFC as evidence. Ethiopian blocks have been relinquished.
ESAP 6.1	i. The Company will develop a biodiversity strategy for Kenya as described in the ESRS.		Closed	AOC have issued a Biodiversity Management Strategy (KE/ESG/FRM/BD/2017/8) that has been aligned with the Operator's Biodiversity Management Framework that has been accepted by the IFC.
			Closed	For blocks where Tullow Kenya is the Operator, a Kenya Biodiversity Management Framework has been produced and accepted by the IFC. In the event that critical habit is identified in later stages of the project or in new areas, then the strategy will require to be updated to address the relevant PS requirements.
			Closed	A biodiversity panel has been set up and a Terms of Reference agreed by the IFC. There have been three panel meetings and the panel continues to offer advice as required
	ii. The Company will develop a similar plan prior to any substantive work related to development of successful wells in Ethiopia		Closed	Ethiopia blocks have been relinquished.
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.		Closed	AOC commissioned an ESIA for the potential exploratory drilling well at Lake Abaya. The ESIA was completed in Q2 2018. Ethiopia blocks have been relinquished.
		Q4 2022	In progress	The ESIA for the FFD Project was submitted to NEMA in September 2021 for determination. The LLCOP EIA Licence was issued in November 2021. The revised water pipeline ESIA was issued to NEMA in February 2022. A supplementary assessment for the whole project, addressing IFC PSSs, is to be completed by the end of 2022.

Notes: Grey shaded items are closed.

## 5. PROJECT OIL KENYA (POK) ASSESSMENT AGAINST IFC PERFORMANCE STANDARDS

### 5.1 Introduction

This chapter provides an update on previous findings and recommendations made with respect to activities in South Lokichar. A review of the developing POK management systems and plans and the planned SLIP is provided below, followed by an update on progress with a number of specific issues (i.e. the revised water supply pipeline, drill cuttings consolidation, stakeholder engagement and community water supplies).

### 5.2 Project Oil Kenya Management Systems and Plans

#### 5.2.1 Previous Findings

As discussed in the previous IMG review, a number of the previous findings related to POK were associated with the need to finalise and operationalise various environment and social management plans and procedures to conform to the IFC Performance Standard requirements. Project delays due to the revision to the POK Field Development Plan and Covid-19 has meant that the finalisation and operationalisation of these plans and procedures have been superseded by events.

The requirements identified during previous the reviews, along with the broader environmental and social management of POK will now be addressed through a new set of plans and procedures under the POK Environmental and Social Management System (ESMS) and POK ESPP to be developed during 2022 (see Section 5.2.2). Some of the detailed procedures that will sit under the overall POK ESPP will be developed by the main EPC contractor(s) post-FID but prior to commencement of construction in 2023. As well as meeting NEMA regulatory and licence condition requirements, these POK systems, plans and procedures will all need to conform to the requirements of the IFC PSs and associated IFC Environmental, Health and Safety (EHS) guidelines, and will therefore require IMG and IFC review during development and implementation.

Where previous findings are relevant to future activities associated with POK, the relevant findings remain open. The narrative provided in the previous IMG review is not repeated here, however, a summary of the open findings are presented in Table 5.1. The findings that remain open have been assigned as Level 1, as there are no immediate environmental and social risks, given the current level of onsite activity. These will be re-assessed in future reviews, depending on the activities being undertaken or planned at that time, and the status of the required plans and procedures.

Plans exist, or are under preparation, for the ongoing activities including: government and community engagement; land access negotiations; transport; existing site health, safety, security and emergency response requirements; community development, local content and procurement; and influx management. These plans will be modified as required, depending on the level of site activities, and will largely be superseded by the POK ESPP post FID. The SEP for 2022 activities was reviewed by the IMG as part of this review. Other new plans are at an early stage of development and have not been reviewed by the IMG.

**Table 5.1 Project Oil Kenya: Progress with Previous Findings**

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
<b>Performance Standard 1 Assessment and Management of Environmental and Social Risks and Impacts</b>						
Dec 2015 Rev1-PS1-1	<i>Environmental and Social Assessment Management Systems, Policy, Identification of Risks and Impacts, and Management Programmes</i>	Previous IMG reviews identified that the various project and Company documents were a combination of controlled documents and uncontrolled documents and draft reports without issue dates and revision/status.	ESPP and associated mitigation measures, commitments and monitoring requirements that are required by the Operator and the Operator's contractors will need to form part of the tender process and contractual documentation to ensure that commitments are carried forward to detailed project plans and procedures.	Operator HSE and SP Teams with respect to their relevant operations.  Prior to FID, targeted for the end of 2022.	In Progress	Level I  Action required to address this issue to avoid future risks
Jun 2016 Rev2-PS1-1					The ESIA's included an E&S Management Framework that presents the key mitigation measures and project commitments that will require to be adopted by the Operator and its contractors.	
Feb 2018 Rev7-PS1-1					The scope of work for the planned SLIP to be produced by the end of 2022 includes a list of management plans and processes to address IFC PS requirements across all the POK elements.	

Review Date/ Reference	Category	Summary of Findings	Actions	Responsibility and Timing/Revised Timings	Current Status/Comment on Progress	Current IMG Rating
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 changes to planned activities. The operator is developing a Human Resources Procedure including competency frameworks. It was reported that some of these have been completed and others are under development.	It is expected that the Human Resources Procedure will be finalised and operationalised to ensure and demonstrate that a robust process is in place prior to increased work activities, and to fulfil the requirements of PS1.	Operator HR Department  Prior to FID, targeted for the end of 2022.	In Progress  A Human Resources Procedure will be developed once the Project recommences following the current suspension of the main Project activities.  The scope of work for the planned SLIP to be produced by the end of 2022 includes a list of management plans and processes to address IFC PS requirements across all the POK elements.	Level I  Action required to address this issue to avoid future risks

<b>Performance Standard 2 Labour and Working Conditions</b>						
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.	The <i>Contractor Non-Technical Risk Management Procedure</i> (which covers the expectations of contractors and their key obligations for delivering a Non-Technical Risk Management Plan for their specific activities) requires to be finalised for the FFD construction phase.	Operator EHS Team  It is expected that these procedures will be finalised and made operational prior to commencement of construction and other on-site activities involving contractors.	In Progress  Superseded by the planned ESMS, Contractor Management Framework, POK ESPP to be produced by the end of 2022 and the associated procedures to be produced prior to construction.	Level I  Action required to address this issue to avoid future risks
<b>Performance Standard 3 Resource Efficiency and Pollution Prevention</b>						
Mar 2018  Rev5-PS3-1	<i>Greenhouse Gas Emissions</i>	The Operator collates companywide CO <sub>2</sub> emissions through Procedure (T-KE-ESP-PRO-0004) and (T-ESP-PRO-0001).  The FFD ESIA reported the project specific emissions, assuming a worst case of flaring excess associated gas. Further design work is ongoing to evaluate alternatives.	A procedure for the annual collation and reporting of greenhouse gas emissions at project level should be prepared. Where emissions are estimated to be more than 25,000 tonnes per annum then options to improve efficiency and preventative maintenance plans will be required.	Operator EHS Team  Following acceptance of the Field Development Plan, expected in Q1 2022 and the development of the ESPP.	In Progress  The FEED update has no routine flaring with excess gas being injected. Flaring will be restricted to emergency situation and maintenance periods where injection is no possible. Emissions management and reporting to be included in the POK ESPP.	Level I  Action required to address this issue to avoid future risks
<b>Performance Standard 5 Land Acquisition and Involuntary Resettlement</b>						
Mar 2018  Rev5-PS5-1  Feb 2020	<i>Land Access and Resettlement Framework</i>	A revised <i>Land Access and Resettlement Framework</i> (Dec. 2019) and associated strategy was reviewed and is generally aligned with PS 5. This document defines a	Finalise the Land Access and Resettlement Framework, confirming the actions required to bridge the gap between GoK and IFC PS 5, including the provision of supplementary payments to achieve full replacement cost. Develop	Operator Social Performance Team  Final Upstream Land Access Strategy, Upstream Resettlement and	In Progress  The IFC commented on the POK draft Upstream Land Access Strategy. The strategy	Level I  Action required to address this issue to avoid future risks

<p>Rev7-PS5-1,2,3</p>		<p>revised land acquisition process, decoupling the GoK led statutory land acquisition process from KJV's commitments for PS 5 alignment, including supplementary compensation.</p>	<p>Resettlement Action Plan (RAP) and LRP to settle affected households and restore livelihoods. These plans must also specify an appropriate stakeholder engagement process and grievance mechanism for affected individuals and households, including affected indigenous peoples as per PS7 requirements.</p>	<p>Livelihood Restoration Framework plans and procedures to be finalised once land acquisition by NLC has been completed and made operational prior to commencement of construction and other on-site activities.</p>	<p>needs to be updated and finalised (along with the draft Upstream Resettlement and Livelihood Restoration Framework and Resettlement and Livelihood Procedures for supplementary benefits and entitlements) prior to FID.</p> <p>A Community Development Plan addresses additional livelihood restoration measures, social investments, local content plans, training and project benefits to be produced by the end of 2022.</p>	
<p><b>Performance Standard 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b></p>						
<p>Dec 2015  (Rev1-PS6-1, 6-2, 6-3, 6-5, 6-6, 6-7, 6-8,  Jun 2016  Rev2-PS6-9)  Feb 2020</p>	<p><i>Baseline Biodiversity and Habitat Assessment; Ecosystem Services Screening; Conservation Significance Mitigation; Supply Chain Sustainability Assessment; and Monitoring and Evaluation Criteria</i></p>	<p>Critical Habitat has been identified within the Project area. The detailed mitigation strategies and monitoring requirements for a number of key issues have been deferred to the development of detailed management plans. These include the Biodiversity Management Plan (and Biodiversity Action Plan for critical habitats) and Invasive</p>	<p>The ESPP developed from the ESIA and the BAP should address monitoring and evaluation criteria for biodiversity impacts.</p>	<p>Operator HSE Team</p> <p>The ESPP, BMP and BAP will be required prior to FID, targeted for the end of 2022.</p>	<p>In Progress</p> <p>Outputs from the habitat mapping study along with mitigation measures within the ESPP to be used to develop the BMP and BAP. The ESPP is scheduled for the end of 2022 with associated plan being produced</p>	<p>Level I</p> <p>Action required to address this issue to avoid future risks</p>

Rev7-PS6-1		Species Management Plan, amongst others.			prior to the start of construction.	
June 2016 Rev2-PS6-10 Feb 2020 Rev7-PS6-2	<i>Restoration activities</i>	<i>Line Clearance and Restoration Guidelines (T-KE-EHS-GUD-0003 Rev 02)</i> outlines the general approach to managing restoration of disturbed sites. A number of sites that are no longer required have been or are planned to be restored and a site-specific approach requires to be developed.	The restoration guidelines to be updated, drawing on lessons learnt from restoration activities undertaken to date and incorporating the outcomes of the discussions with the TCG. The guidance should include monitoring and maintenance schedules, where required, for future site restoration practices.	Operator HSE Team  It is expected that the procedures will be finalised and made operational prior to construction activities commencing on site, expected in 2023.	In Progress  Pending outcome of discussions with TCG on requirements and standards for restoration and hand-back of sites.  The ESPP is scheduled for the end of 2022 with associated plan being produced prior to the start of construction.	Level I  Action required to address this issue to avoid future risks.
Dec 2015 Rev1-PS6-5 Jun 2016 Rev2-PS6-11	<i>Invasive Species Management</i>	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 related activities. The existing invasive species management list is contained in the broader Kenyan Biodiversity Management Plan.	An <i>Invasive Species Management Procedure</i> should be produced to relate to site-specific requirements and incorporated into site specific EHS Management Plans.	Operator HSE Team  It is expected that the procedures will be finalised and made operational prior to construction activities commencing on site, expected in 2023.	In Progress  This requirement should be aligned with the site restoration guideline update described above.  The ESPP is scheduled for the end of 2022 with associated plan being produced prior to the start of construction.	Level I  Action required to address this issue to avoid future risks.

## 5.2.2 Supplementary Lenders Information Package

The KJV is in the process of contracting consultants to undertake support in the development of Supplementary Lender Information Package (SLIP) for all the elements of POK to address gaps with respect to the issued ESIA and the requirements of the IFC Performance Standards and associated World Bank guidance, and the Equator Principles (IV). This is scheduled to commence in mid-2022 and be completed by the end of 2022. The SLIP will comprise three volumes as outlined below.

- Volume 1 will be a summary of the ESIA activities undertaken for POK to date.
- Volume 2 will consist of a series of issue-specific reports addressing gaps between the NEMA ESIA and the lender requirements.
- Volume 3 is to be developed by the KJV, informed by the work undertaken for Volume 2, and will comprise the POK ESMS Framework and ESPP(s) for the Construction and Operations phases.

The POK ESMS will be developed, presenting the management systems and structures to be implemented to manage the overall environmental and social risks, KJV standards, ESIA commitments, EIA licence requirements and lender requirements. As responsibility to deliver the POK requirements will apply to the KJV and its contractors during the construction phase, a Contractor Management Framework will also be developed to incorporate the ESPP(s) requirements into the contract agreements with the selected EPC contractor(s). For the Operations phase, the KJV will adopt the ESPP. The ESPP will incorporate all the project commitments and requirements from the ESIA, NEMA EIA licence conditions and lender standards requirements.

Table 5.2 presents the key topics to be addressed in the SLIP, referencing the IFC PS the topics sit under, along with further details of issues to be addressed in the Volume 2 report, where relevant. Table 5.3 presents the key issues to be addressed in the construction and operations phase ESPP(s).

The scope of the SLIP and ESPP appears comprehensive, addressing the key requirements of the IFC PS and related guidance. The detailed contents will be further developed by the contractor undertaking the SLIP and it is expected that these will be referenced to the specific IFC PS and other lender requirements such as the Equator Principles (EP IV). It is assumed here that the Operations Phase Decommissioning & Closure Framework will include the requirements of the Construction Phase Land Disturbance and Rehabilitation Management Plan and that the SEP includes the grievance mechanism.

**Table 5.2 Topics to be addressed in Volume 2 of the SLIP**

Topic to be Addressed	Further Details
Assessment of Environmental and Social Risks	<ul style="list-style-type: none"> <li>■ Climate Change &amp; Resilience Assessment                             <ul style="list-style-type: none"> <li>- Climate Change Scenarios</li> <li>- Climate Change Implications for Project</li> <li>- Design and Mitigations</li> </ul> </li> <li>■ Cumulative Impacts Assessment</li> <li>■ Human Rights Assessment</li> <li>■ Supply Chain Assessment</li> </ul>
Labour & Working Conditions	<ul style="list-style-type: none"> <li>■ Labour Assessment</li> <li>■ Human Resources Policies &amp; Procedures</li> <li>■ Working Conditions &amp; Terms of Employment</li> <li>■ Management of Migrant Workforce</li> <li>■ Worker Accommodation</li> <li>■ Workers Organisations</li> </ul>

	<ul style="list-style-type: none"> <li>■ Non-Discrimination &amp; Equal Opportunity</li> <li>■ Retrenchment &amp; Demobilisation Planning</li> <li>■ Worker Grievance System (including sub-contractors)</li> <li>■ Child Labour/Forced Labour</li> <li>■ Occupational Health &amp; Safety</li> <li>■ Management of Sub-contractor Workers</li> <li>■ Supply Chain Assessment &amp; Management</li> </ul>
Resource Efficiency & Pollution Prevention	<ul style="list-style-type: none"> <li>■ Resource Efficiency</li> <li>■ Greenhouse Gas Management</li> <li>■ Water Consumption</li> <li>■ Pollution Prevention</li> <li>■ Waste Management</li> <li>■ Hazardous Materials Management</li> <li>■ Pesticide Use &amp; Management</li> </ul>
Community Health, Safety & Security	<ul style="list-style-type: none"> <li>■ Community Health Safety &amp; Security Management</li> <li>■ Infrastructure &amp; Equipment Design &amp; Safety</li> <li>■ Hazardous Materials Management &amp; Safety</li> <li>■ Community Exposure to Disease</li> <li>■ Influx Management</li> <li>■ Emergency Preparedness &amp; Response</li> <li>■ Use of Security Personnel (including Voluntary Principles etc)</li> </ul>
Land Acquisition, Resettlement & Livelihood Restoration	<ul style="list-style-type: none"> <li>■ Supplemental Resettlement &amp; Livelihoods Restoration Framework/Plan</li> </ul>
Biodiversity Conservation and sustainable Management of Living Natural Resources	<ul style="list-style-type: none"> <li>■ Critical Habitat Assessment</li> <li>■ Alternatives Assessment related to Critical &amp; Natural Habitat</li> <li>■ Biodiversity Monitoring &amp; Evaluation for Critical &amp; Natural Habitats</li> <li>■ Biodiversity Action Plan (for areas of Critical Habitat)</li> <li>■ Biodiversity Management Plan</li> <li>■ Legally Protected and Internationally Recognised Areas</li> <li>■ Invasive Alien Species</li> <li>■ Ecosystem Services &amp; Management of Ecosystem Services</li> <li>■ Sustainable Management of Living Natural Resources</li> </ul>
Vulnerable, Marginalised & Indigenous Groups Assessment	<ul style="list-style-type: none"> <li>■ Indigenous Peoples Assessment</li> <li>■ Approach to and Application of FPIC</li> <li>■ Critical Cultural Heritage</li> <li>■ Summary of Mitigation &amp; Development Benefits</li> </ul>

**Table 5.3 ESPPs for Construction and Operations Phases**

Project Phase and Plan	Details
Construction Environmental Performance Plan	<ul style="list-style-type: none"> <li>■ Air Emissions Management Plan</li> <li>■ Biodiversity Management Plan</li> <li>■ Construction Environmental Management Plan</li> <li>■ Emergency Preparedness &amp; Response Plan</li> <li>■ Hazardous Materials Management Plan</li> <li>■ Invasive Species Management Plan</li> <li>■ Land Disturbance and Rehabilitation Management Plan</li> <li>■ Marine Management Plan</li> <li>■ Noise &amp; Vibration Management Plan</li> <li>■ Transport Management Plan</li> <li>■ Waste Management Plan</li> <li>■ Water Resources Management Plan</li> </ul>
Operational Environmental Performance Plan	<ul style="list-style-type: none"> <li>■ Air Emissions Management Plan</li> <li>■ Biodiversity Management Plan</li> <li>■ Decommissioning &amp; Closure Framework</li> <li>■ Emergency Preparedness &amp; Response Plan</li> <li>■ Hazardous Materials Management Plan</li> <li>■ Marine Management Plan</li> <li>■ Noise &amp; Vibration Management Plan</li> <li>■ Transport Management Plan</li> <li>■ Waste Management Plan</li> <li>■ Water Resources Management Plan</li> </ul>
Construction Social Performance Plan	<ul style="list-style-type: none"> <li>■ Community Health &amp; Safety Management Plan</li> <li>■ Cultural Heritage Management Plan</li> <li>■ Influx Management Plan</li> <li>■ Labour Management Plan</li> <li>■ Resettlement &amp; Livelihood Restoration Framework</li> <li>■ Security Plan</li> <li>■ Stakeholder Engagement Plan</li> <li>■ Supply Chain &amp; Local Content Management Plan</li> <li>■ Worker Health &amp; Safety Management Plan</li> </ul>
Operational Social Performance Plan	<ul style="list-style-type: none"> <li>■ Community Health &amp; Safety Management Plan</li> <li>■ Influx Management Plan</li> </ul>

	<ul style="list-style-type: none"><li>■ Labour Management Plan</li><li>■ Security Plan</li><li>■ Stakeholder Engagement Plan</li><li>■ Supply Chain &amp; Local Content Management Plan</li><li>■ Worker Health &amp; Safety Management Plan</li></ul>
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### 5.3 Water Supply Strategy

The water supply pipeline route from the water storage at the Turkwel dam to the upstream development site was revised from the original alignment in the draft upstream ESIA following a FEED review, completed in Q4 2021. Following the submission of the upstream ESIA a separate water supply pipeline ESIA was submitted to NEMA with the new alignment in February 2022.

The original pipeline route was selected in 2019. This route was based on the water pipeline from Turkwel Gorge Reservoir running to the south of the Turkwel river in an area between the Turkwel and Weiwie rivers, known as the Anglogit triangle, and crossing the Weiwie river upstream of the confluence with the Turkwel river. This area between the two rivers is known as the Anglogit triangle and forms a natural habitat extension to the Nasolot National Reserve.

The FEED review provided the KJV with opportunities to improve the design and enhance constructability. Outcomes of the review included a recommendation to change the pipeline design and construction material to allow higher pressures and therefore less pumping, and a change in the proposed alignment. The original 2019 alignment passed through the sensitive Anglogit triangle area identified as critical habitat, and the proposed river crossing location, located upstream of the confluence of the Weiwie and Turkwel rivers, was in a sensitive riparian corridor and would require extensive mitigation measures including the boring of a 1,200 m tunnel under the Turkwel river.

Based on a route selection review, a revised route was identified to:

- simplify construction;
- reduce construction times; and
- avoid, as far as possible, sensitive habitats.

The revised alignment now follows a route further to the north, avoiding the Anglogit triangle between the Turkwel and Weiwie rivers and increasing the distance between the pipeline and the Nasolot National Reserve. The new route is designed to avoid impacts on natural habitat and reduce impacts on critical habitat as far as possible, and avoid sensitive watercourse crossings.

AOC consulted with the Biodiversity Advisory Panel (a panel of independent experts set up by the KJV to advise on biodiversity issues related the POK). A delegation from the panel attended a field visit in to assess the revised route on the 9<sup>th</sup> and 10<sup>th</sup> December 2021, and discussed their findings with the ESIA consultant on the 10<sup>th</sup> and 15<sup>th</sup> December. The panel concurred that the new route, water crossing location, and water crossing method were all appropriate and an improvement on the original proposed route.

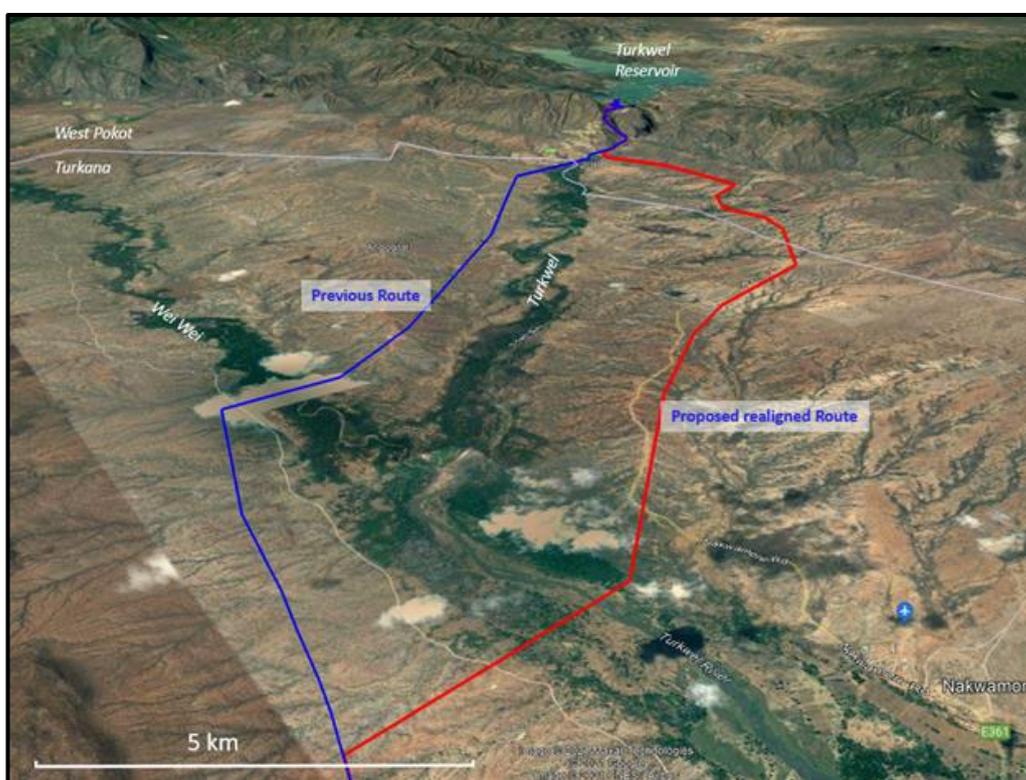
The revised water supply approach will include six community offtake points to provide water intended for animal husbandry and irrigation purposes (i.e. not for direct human consumption). The selection of the number and location of the community water off-takes was based on a number of factors including population densities, the proximities of the main settlements to the proposed water pipeline route, the

risk of constructing a water pipeline next to communities that have no access to water, and also legacy issues related to the construction of the Turkwel dam.

A review of the water supply ESIA against IFC PS requirements was completed by Wood PLC in January 2022 that identified the key issues that the SLIP should address. The review identified the need for a number of additional studies and management plans to be developed including a Biodiversity Action Plan (BAP), Invasive Species Management Plan (ISMP), Cultural Heritage Management Plan, a number of a community, health, safety and security plans, a Land Acquisition and Resettlement Framework (LARF), Resettlement Action Plan (RAP) and Livelihoods Restoration Plan (LRP). As the water supply infrastructure is part of the overall POK, the requirements for these plans will be incorporated into the POK ESPP to be developed by the end of 2022.

The IMG considers that revision of the pipeline route to avoid natural (and potentially critical) habitat demonstrate the correct application of the mitigation hierarchy, i.e. to avoid key receptors and reduce impacts at the project design stage.

**Figure 5.1 Original 2019 and Revised 2022 Water Supply Pipeline Routes**



Source: Proposed Make-Up Water Supply Project 2022

## 5.4 Drilling Cuttings and Waste Storage Disposal Plan

In the previous IMG review, the Drilling Cuttings Waste Storage and Disposal Plan (dated December 2020) was described. This involved the planned consolidation of solid and liquid drilling wastes (drill cuttings containing residual hydrocarbons, oily water, silicate water and oil sludge) from ten drill sites used in the exploration and appraisal phases of POK into one site at the Twiga well site, in Block 13T. Following site inspections by national and county level GoK representatives and NEMA the plan was given approval, and the lined storage pits at the Twiga site were upgraded and expanded and then licenced by NEMA for the temporary storage of these wastes, pending the construction and commissioning of the proposed IWMC at the CPF.

For the current IMG review, AOC reported that the work to consolidate the drilling wastes at Twiga has now been completed following delays to the work related to Covid-19 restrictions and seasonal rainfall. There are approximately 22,000 tonnes of drill cuttings and liquids now stored at Twiga. The cuttings have been stored at the different drill sites for up to eight years and it was reported by AOC that sample analysis has indicated that the organic fraction (synthetic drill fluids and hydrocarbons) has been broken down over that time. Further work is required to fully characterise the drill cutting wastes to determine the contamination levels and whether, after further natural or enhanced bioremediation, they could be beneficially used, e.g. as construction fill. Much of the liquid wastes have evaporated and other liquids have been take off-site for disposal or are being stored pending later disposal.

A site visit was undertaken to the Twiga site and three of the cleared drill sites by members of the TCG Environment Committee, community representatives and KJV on 19<sup>th</sup> January 2022. The aim was to monitor progress of the waste consolidation process, the waste handling operations and adherence to NEMA improvement requirements. The meetings notes indicate that the site visit attendees were content with the progress made to date and that ongoing monitoring was required. As part of the Drill Cuttings Waste Storage and Disposal Plan, the KJV will undertake monthly inspections, quarterly sampling and annual audits of the Twiga site. NEMA and the TCG will also undertake quarterly audits

## 5.5 Stakeholder Engagement

The stakeholder engagement process for POK has developed over time from the exploration and appraisal activities through the various ESIA processes to the current Stakeholder Engagement Plan (SEP) (dated January 2022) that covers activities to be undertaken in 2022. For the disclosure of the upstream ESIA, this was undertaken at national and country government level, as well as with representative community members through a series of community meetings. For the midstream ESIA, this was a government led process.

The current SEP has been posted on the Tullow website and it outlines a number of engagements that have occurred, including the upstream ESIA disclosure and consultation process, and planned engagements to occur in 2022. The IMG considers that the current SEP is appropriate for this stage of the project and the low level of current activities.

The current SEP will need to be updated to address future activities, both pre- and post-FID. It is expected that this will focus on disclosure of community benefits/local content and procurement, land access issues, community health and safety issues in relation of construction activities, and the grievance mechanism.

As all elements of POK are part of one integrated project, a consistent approach to the construction and operations SEPs for the water supply, upstream and midstream elements is planned. The development of the SEPs will require collaboration with the national and county governments across the project footprint.

A copy of the consolidated Grievance Register covering registered grievances from 2015 to 2021(dated June 2021) was provided as part of the previous review. It was reported at that time that recent grievances are at a low level and related to community requests for more engagement on project plans, issues around contractor payments and related contract conditions, and loss/injury to livestock from damaged compound fencing. It was reported by AOC for the current review that there have been no new grievance recorded since the last report was provided.

In the previous review the approach to consultations with vulnerable and marginalised communities, with respect to IFC PS 7 (indigenous Peoples) was discussed. A key part of the engagement plan for communities such as the Turkana will be through the Community Development Plan (CDP) that will

address project commitments such as livelihood restoration, local content, training and social investments. The CDP will form part of the ESPP to be developed by the end of 2022.

## 5.6 Community Water Supply

The KJV has been supplying water to communities within Turkana County since 2012, using water bowsers supplied from boreholes to fill 23 water tanks located within communities. These are mainly in Turkana South sub-county with some also in Turkana East sub-county. The issue of the sustainability of this process and alternative approaches to community water supply have been under discussion between the TCG, KJV and community representatives since 2014. AOC has reported that the costs of this water supply approach are very high and has led to a number of issues including the creation of community dependency on the KJV, vandalism of water tanks (assumed to be associated with creating employment for local communities to repair these) and influx of people to the areas where water is being supplied.

To develop a more sustainable approach to water supplies, the KJV has been in discussion with the TCG and other stakeholders to hand over community water supply to the TCG, with support from the KJV. The principle being applied here is that the KJV should provide supplementary benefits to communities and not be responsible for core services that should be provided by the county government, e.g. community water supply. The aim is to develop a phased approach to provide piped water systems to the communities, with the boreholes, pumps, piped systems and offtakes to be managed and maintained by the TCG and local communities.

For operations in block 10BB, in the Turkana East sub-county, a water reticulation project has been developed. The development of the project followed a memorandum of understanding (MOU) between the KJV and the TCG dated 5 December 2017. The MOU addressed the provision of sustainable community water supplies to the approximately 5,100 people and 17,500 livestock (2017 data) within the communities in the Nakukulas/Lokicheda area by replacing the bowser deliveries with a reticulation system from a borehole (Nakukulas borehole 10 installed in 2011 close to the Ngamia-1 drill site). The project was named the Kodekode Water Reticulation Project and required the formation and training of a community based Kochodin Water Resources Users Association. The water supply system was installed in 2018 and is operated using a solar powered pump with water from the borehole rising main pumped to a 100 m<sup>3</sup> storage tank at Kodekode, feeding a water distribution line. Booster pumps and storage tanks have also been installed to supply 14 community water offtake points installed along the water line, which also supplies 11 livestock water troughs. There is some solar power already installed for the pumping system and it is planned that all the pumps will be solar powered in due course. A formal handover to the Kochodin Water Resources Users Association, through the TCG, was agreed and a Handover Deed was drafted in June 2020. The deed is currently undergoing review by the TCG Attorney General.

It was reported from a meeting between the KJV with the TCG Ministry of Water (25 January 2022) that there have been operational issues with the project due to illegal offtakes from the water supply system and issues with the management of the users association, requiring some members to be removed. The minutes from that meeting also report that TCG plan to create urban and rural water service providers to manage the county water supplies (planned to be in place in March 2022). The Kodekode Water Reticulation Project would fall under the responsibility of the Rural Water Services Provider.

The second phase of the water supply strategy will be the installation of a reticulation system for communities in Turkana South sub-county using an existing borehole at Namanthelem. This would come under the jurisdiction of the new Urban Water Service Provider (as Lokichar is designated as an urban area). An overall approach has been agreed to by the TCG Chief Water Officer and more detailed discussions and agreements are now required to implement the strategy.

The steps being taken to hand-over the existing project-related community water supplies to the TCG and the relevant water supply companies are important for how POK community support and

development is managed to avoid dependencies, and for the management of project-induced in-migration and the associated stresses on water supplies and other community resources, as well as the potential for conflict. Some in-migration to the POK sites from within the affected counties and farther afield is inevitable, given the requirement for labour and services to support POK. Integrating the POK requirements to manage in-migration with the broader GoK and TCG spatial planning and strategic planning for managing water and other resources will have a greater chance of success than a POK led strategy focussed only on supply water to Project Affected People (PAP).

As described in Section 5.2.1 and Section 5.2.2, POK intend to develop an influx management plans for current activities and for the Construction and Operations phases of POK. These plans will need to be integrated with the related existing and developing plans (i.e. stakeholder engagement; community health and safety; security; local content; community development; and resettlement and livelihood restoration). It is expected that the influx management plans will follow the guidance provided in: Projects and People. A Handbook of Addressing Project-Induced In-Migration, IFC, 2009.

## 6. ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM REVIEW

### 6.1 Development of AOC ESMS Framework

AOC has developed a Corporate ESMS Framework and associated corporate policies, procedures and standards of operation to apply to potential future operational roles as well as for oversight of AOC's current and any new interests in non-operated assets. These were reviewed in previous IMG reviews and recommendations made in the previous IMG review for fuller alignment with the IFC PS. These documents have been uploaded onto AOC's website. The ESMS Framework is subject to annual review (next review due in May 2022) and the associated Policies and Standards of Operations are to be reviewed every two years (next review due in May 2023). No updated policies, standards of operations, or risk registers were available for the current review. It is expected that the outcome of the scheduled ESMS review will be available for the next IMG review.

### 6.2 ESG Management and Reporting

AOC issued its first Sustainability Report, for year ending 31<sup>st</sup> December 2020, on 25<sup>th</sup> March 2021 and its second Sustainability Report, for the year ending 31<sup>st</sup> December 2021, on 28<sup>th</sup> February 2022. AOC has aligned its Sustainability Reports with the SASB reporting standards and the Task Force on Climate Related Financial Disclosures (TCFD) reporting requirements. For the operated assets offshore Nigeria, AOC is working through Prime Oil and Gas to obtain the relevant performance data from the operators for its Sustainability Report requirements.

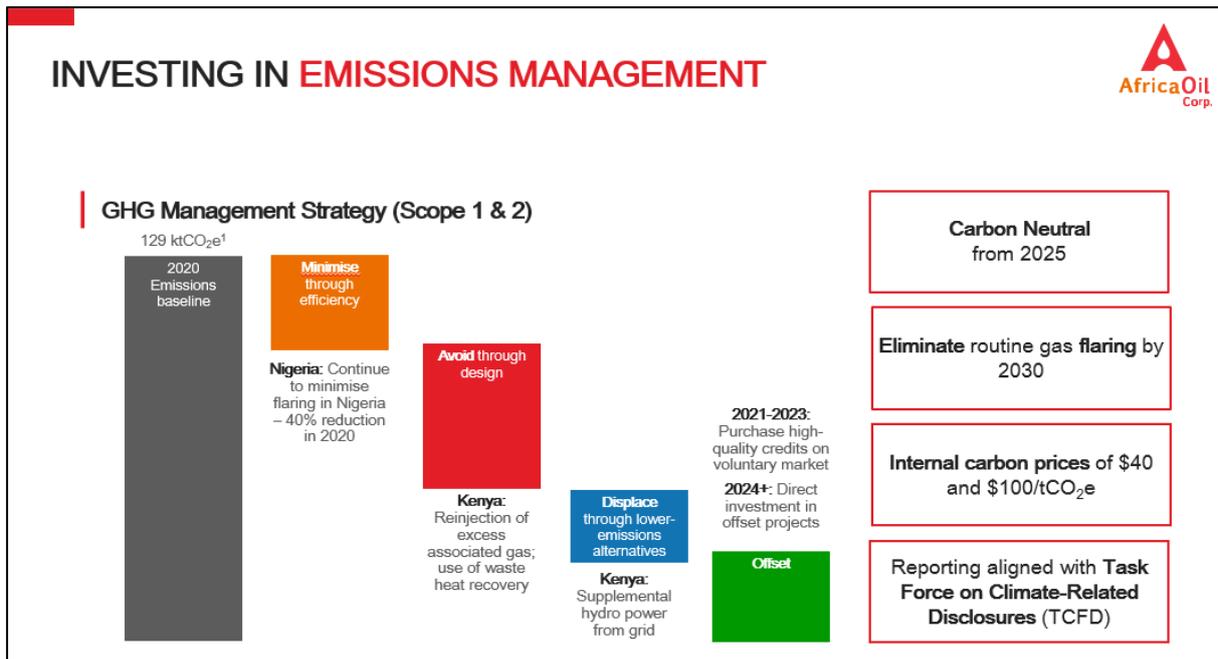
### 6.3 Energy Transition Strategy

AOC is developing an Energy Transition Strategy that aims to build in the consideration of climate change risks into AOC's policies, plans, projects and investment decision-making. Comments on the planned approach were provided in the previous IMG review, including recommendations on shadow pricing, setting science-based targets, the use of Marginal Abatement Cost Curves and benchmarking emissions, leakage and flaring against sector best practice.

In September 2021, AOC created a new post and recruited a Vice President of ESG. Development of AOC's Energy Transition Strategy is planned for 2022 along with the development and implementation of appropriate ESG mechanisms to deliver the strategy. AOC has confirmed its commitment to be carbon neutral from 2025. This will be achieved through the adoption of the emissions reduction hierarchy and a series of short-, medium- and long-term targets, aligned with the Operators strategies. Details of the overall approach were provided in the previous IMG review and are illustrated in Figure 6.1.

AOC plans to undertake an annual Climate Risk and Resilience Review and GHG management will be reported in the annual Sustainability Reports, following the SASB standard. AOC also plans to provide more detailed information on emissions through further engagement with partners and operators, as discussed above, to align with the TCFD reporting requirements.

Figure 6.1 Overview of AOC Energy Transition Strategy



Source: AOC Corporate Presentation November 2021

## 7. CONCLUSIONS

### 7.1 ESAP Requirements

The ESAP requirements relevant to the current and planned POK operations in South Lokichar are mainly closed, with some pending revisions to draft documents or completion of management plans still required. The ESAP may be revised at some stage by the IFC to take into account AOC's broader portfolio of interests developed since the original ESAP was agreed.

### 7.2 Project Oil Kenya

The revised upstream ESIA was submitted to NEMA in September 2021 and the revised water supply pipeline ESIA was submitted to NEMA in February 2022 and are currently being reviewed. A supplementary lenders information package to address specific IFC PS and other lender requirements is planned for the second half of 2022.

For the review of the POK project documentation, most open actions are pending further project development as it moves towards FID and preparation for the construction and operational phases, once the main contractors have been appointed. The outstanding actions have been assigned as a Level 1 finding where there is no immediate environmental and social risk, given the current low level of onsite activity. To manage non-technical risks related to activities undertaken prior to FID, a stakeholder engagement plan covering activities in 2022 has been produced and a series of management plans are under preparation (covering such issues as ongoing site health and safety, community development, and influx management). These plans under preparation have not been reviewed by the IMG, however, available plans will be reviewed at the next IMG review, depending on the activities being undertaken on site at that time. Progress with the handover of community water supplies to the TCG will also be reviewed at that time.

### 7.3 ESG Management, Reporting and Energy Transition

AOC Corporate ESMS Framework and associated corporate policies, procedures and standards of operation are subject to annual review (due May 2022) and the Standards of Operations to biannual review (due May 2023) therefore no new or updated documents were available for this review. AOC's second annual Sustainability Report (to 31 December 2021) was issued on 28<sup>th</sup> February 2022. Further work will be undertaken in 2022 to obtain joint-venture agreements with the operators of its non-operated assets on the type and detail of HSE reporting that it requires to meet the adopted SASB and TCFD reporting standards.

The Energy Transition Strategy will be developed during 2022. AOC has confirmed that its aim is to be carbon neutral from 2025.

### 7.4 Recommendations for Next Review

The focus of the next review will be dependent on the level of activity at existing assets and any future investment decisions, as well as the outcome of any update of the ESAP. The further development of POK, following the determination by NEMA of the licence application and progress with the SLIP and the associated ESPP as the Project moves towards FID at the end of 2022 are likely to be key elements of the review. There will also be a review of AOC's ongoing oversight and ESG reporting in relation to its non-operated assets and progress with its Energy Transition Strategy. The next review is currently scheduled for the third quarter of 2022.

## APPENDIX A      ADDITIONAL DOCUMENTS PROVIDED BY AOC FOR CURRENT REVIEW

SOURCE/TOPIC	DOCUMENT TITLE
AOC Updates	Africa Oil Overview IMG 020222 Africa Oil Presentation November 2021 AOC Report to Shareholders Q3 2021
POK –Midstream ESIA	NEMA - Environmental Impact Assessment License - 17 Nov 2021
POK - Upstream ESIA	POK ESIA Submitted Volumes I-III September 2021 IFC Supplement SoW
POK – Water Supply Pipeline ESIA	807809-00-EN-TEN-0001 MUWP IFC GAP Analysis Technical Note_RevA 807809-00-EN-TEN-0002 MUWP IFC PS Technical Note_RevB 807809-00-PM-BOD-0001 - Basis of Design Rev0 – Signed 1433956.624.B.0 - June 2019 Turkwel Field Survey_V2_RJL Water Supply Pipeline - Decision Note – 15/06/2021 Water Supply Pipeline ESIA SoW 10/09/2021 Water Pipeline revised route Jan 2022 POK Water Supply Pipeline FINAL ESIA 14/02/2022
Biodiversity Advisory Panel	AOC Water Supply Pipeline Field Trip 10 Dec 2021 AOC Biodiversity Advisory Panel Report Dec 2021 1433956_645_Appendix A Critical Habitat Assessment-BND1-L-ESEE04
POK - Waste	TCG Environment Committee Site Visit 19/01/2022
POK – Stakeholder Engagement	POK Upstream ESIA Chapter 4.0 Stakeholder Engagement A2 Report on POK Stakeholder Engagement August 2021 POK Stakeholder Engagement Plan 28/01/2022
Community Water Supply	TCG Min of Water 26/01/2022 09062020 Kode Kode water reticulation project handover meeting Kode Kode water project – MOU NAKUKULAS - KOCHODIN Water Project - Handover Deed_ June 2020 TCG working group meeting 11/01/2018
POK NTR	NTR - Influx Plan 10/11/2021
Prime Updates	3Q 9M 2021 Report Prime Oil Gas Final

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