

**GRYPHON**  
**ENVIRONMENTAL AND SOCIAL ACTION PLAN**  
 May 15, 2009

#	Action Description	Indicator of Completion	Timeframe
1	<p><b>Sustainability Organization and Management</b></p> <p>a) Finalize the draft Health, Safety, Environment and Community (HSEC) Policy documentation with commitments appropriate to the level of activities, including a commitment to undertake a Soils and Land Capability Survey and prepare a Land Use Plan that will inform the Feasibility Study.</p> <p>b) Finalize the draft Human Resources Policy (that also covers management of contractors and sub-contractors) in line with PS2.</p> <p>c) Disclose key HSEC/Labor documents on Gryphon’s website after they are reviewed and agreed with by IFC.</p> <p>d) Develop Emergency Preparedness and Response Plan.</p>	<p>HSEC Policy and Human Resources Policy reviewed and approved by IFC</p> <p>Disclosure of HSEC and HR Policies on the Company Website</p>	<p>Within 3 months of subscription</p>
2	<p><b>Social Impact Assessment</b></p> <p>Hire a consultant with relevant experience to help Gryphon undertake a rapid socio-economic assessment and impact assessment of temporary economic displacement on the owners of agricultural land and on other affected parties that is resulting from exploration activities and develop an impact mitigation strategy targeting those impacted people.</p>	<p>Consultant Terms of Reference developed jointly with IFC and consultant selection process initiated</p> <p>Signed consultant contract</p> <p>Social Impact Management Plan reviewed and approved by IFC</p>	<p>Prior to commitment</p> <p>Within 1 month of subscription</p> <p>Within 4 months of subscription</p>

