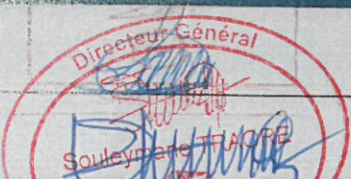





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Role	Title/Position
Author	NTRospective Consultancy BV
Owner	Community Relation Manager

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ACRONYMS

ADREMGUI	Association for Rural Development and Mutual Support in Guinea
AJK	Association des Jeunes pour le Développement de Kakande
AJDEF	Assistance Justice aux Droits des Enfants et Femmes
ALD	Agreement for Local Development
AMC	Alliance Mining Commodities
AMR	Responsible Mining Alliance
CBG	Compagnie des bauxites de Guinée
CCEJ	Guinean Advisory Council for Children and Young People
CDM	Mining Development Company (China)
CECI	Research and International Cooperation Centre
CECIDE	International Trade Centre for Development
CEFAD	Centre de Formation et d'appui au Développement
CEFAKAM	Centre d'encadrement et de formation Amie Camara
COBAD	Compagnie de Bauxite et d'Alumine de Dian Dian
CR	Community Relations
CRM	Community Relations Manager
CRS	Community Relations Superintendent
GAC	Guinea Alumina Company
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GMM	Grievance Management Mechanism
IFC	International Finance Corporation
INASP	International Network for Availability of Scientific Publications
LRP	Livelihood Restoration Plan



MTPA	Million Tons Per Annum
MUOA	Multi-User Operational Agreement
PAP	Project Affected People
PRIDE	Integrated Programme for Enterprise Development
PS	Performance Standards
PWDs	Persons With Disabilities
RRSMP	Road and Rail Safety Management Plan
RTG	Guinean Radio and Television
SCRA	Sectoral Community Relations Adviser
CEC	Community Engagement Coordinators
SEP	Stakeholder Engagement Plan
SYDEV	Synergies and Development
TPE	Très Petites Entreprises

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1. INTRODUCTION

This document is a summary version of the Stakeholder Engagement Plan 2022-2025 (SEP) (D390-SOC-PLN-005) prepared for the Compagnie des Bauxites de Guinée (CBG), a bauxite mining company jointly owned by the Government of Guinea and Halco Mining (a joint venture of Alcoa, Rio Tinto and Dadco).

The main purposes of the Summary SEP is to provide an overview of the stakeholders identified, the past engagement activities undertaken, the stakeholder engagement activities planned for the 2022-2025 period, roles for stakeholder engagement and monitoring and reporting on progress with respect to stakeholder engagement.

The SEP is in full alignment with the legal requirements of the Government of Guinea and good international industry practice (GIIP), as established by the IFC Performance Standards on Environmental and Social Sustainability (2012).

The SEP is organised into eight chapters, summarized in this SEP Summary Version:

Chapter 1 is the introduction to the CBG SEP 2022-2025 and its topics.

Chapter 2, Project Description, reviews the company's activities and potential risks and impacts on directly affected communities relevant to the SEP.


Chapter 3, Framework for Stakeholder Engagement, outlines the company's stakeholder engagement requirements under Guinean law and for compliance with IFC Performance Standards. It also describes CBG's values for stakeholder engagement.

Chapter 4, CBG Stakeholders, presents the company's process for identifying and mapping its external stakeholders to determine the level of engagement to be adopted with each.

Chapter 5, CBG's Stakeholder Engagement Programme, describes the SEP's objectives, activities to date and planned, topics, methods, level and frequency.

Chapter 6, Grievances Management Mechanism, summarizes the grievance mechanism process and the method for its popularization in the communities.

Chapter 7, Participation of Stakeholders in Environmental Monitoring, describes how the community representatives will be included in the environmental monitoring process.

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Chapter 8, Resources and Responsibilities, outlines the documentation, monitoring and reporting methodology, including SEP Results and Key Performance Indicators.

2. PROJECT DESCRIPTION

2.1 Summary of CBG Operations

CBG is a bauxite mining company jointly owned by the Government of Guinea and Halco Mining (a consortium of Alcoa, Rio Tinto and Dadco), which has been an active producer of bauxite in Guinea since 1973. CBG mines bauxite ore in the Sangarédi area of western Guinea and transports the ore material via rail to its facility in Kamsar, where bauxite is crushed, dried, stored and shipped. Following the completion of CBG’s expansion project, which required scaling up mine production in Sangarédi, adding new infrastructure to the processing facility at Kamsar and increasing the capacity and frequency of rail traffic on the corridor between the two locations, CBG currently has a production capacity of 18.5 million tonnes per annum (MPTA). As part of the expansion project, CBG undertook an Environmental and Social Impact Assessment (ESIA) and developed several plans to manage the project’s environmental and social impacts.

CBG, GAC (Guinea Alumina Project) and COBAD (Compagnie de Bauxite et d’Alumine de Dian-Dian) are currently upgrading the capacity of the Boké railway to accommodate additional tonnage from CBG’s expansion and the production of the two other user companies. An ESIA was also conducted to study the environmental and social impacts of this project¹.

¹ ESIA’s produced for CBG projects have been duly disclosed with relevant stakeholders (for more information please, see section 5.1).


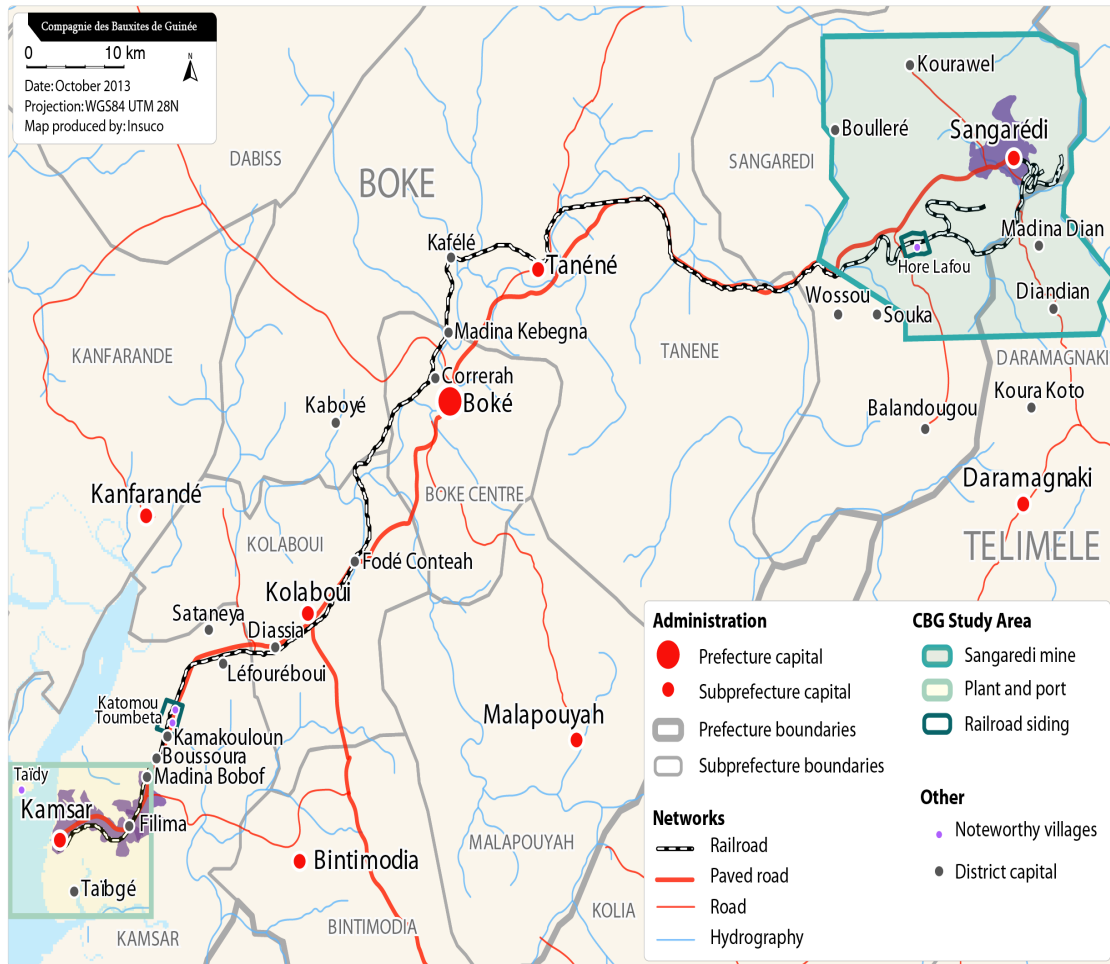
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Figure 1. Overview of CBG areas of operation



2.2 CBG Project and Activities Relevant to the 2022-25 SEP

Engagement activities for the period 2022-25 will cover current and new projects associated with CBG’s mining, rail and port-related activities².

² Note that port related activities refer to all activities carried out in the Kamsar island area, water pumping stations (Boké and Kolaboui), sand extraction areas (Bintimodia), the ports and landing stage in Kamsar.

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The current projects are, among others, current mining activities in Sangarédi and Daramagnaki, the ongoing LRPs, current rail activities along the Sangarédi –Kamsar corridor, activities in the area of the port of Kamsar etc.

Upcoming projects contemplate, for example, future mining activities in Sangarédi and Daramagnaki, future rail activities along the Sangarédi-Kamsar corridor, future activities in the Kamsar port area.

2.3 Overview of Directly Affected Communities³

The affected community in CBG’s mining area is mainly located in Sangarédi, with a population of approximately 54,000 inhabitants and a rural population of over 16,000 people⁴.

The project’s rail corridor includes the town of Boké, which is the administrative centre of the region, where both the Governor and the Prefect are based.

The population of the Kamsar port area is estimated to be 134,000 people (2015)⁵, including Kamsar City, an area of housing and services intended mainly for CBG employees and their families, and Kamsar village, an urban core and outlying districts. There are two artisanal fishing ports (Port Fory and Port Néné) as well as several landing sites along the Rio Nunez estuary near Kamsar.

2.3.1 Vulnerable Groups

Vulnerable groups include people who, by virtue of their gender, ethnicity, age, physical or mental disability, economic disadvantage or social status, may be more diversely affected by the project than others and/or who may be limited in their ability to engage with the project and claim relevant development benefits.


On this basis, the following groups have been identified as potentially vulnerable:

- Female heads of household (including widows)
- People with disabilities or suffering from chronic diseases
- The elderly

³ In addition to directly affected communities, there are communities within CBG’s area of influence which have the potential to be indirectly affected by cumulative impacts, by virtue of their unmet expectations of the company and so forth.

⁴ Source: Environmental and Social Impact Assessment of the CBG Mine Expansion Project.(2018)

⁵ <https://www.city-facts.com/port-kamsar> Accessed 29th November 2021.

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- Land-less households or households experiencing food insecurity

2.4 CBG Project Risks and Impacts

CBG operations revolve around three areas: the mines in Sangarédi, the areas surrounding the rail line that links the mines with the port, and the port area.

ESIAs for the different CBG projects identified potential environmental, health, safety and socioeconomic risks or impacts to the communities in the areas of operations, such as accidents, land disturbance, increased dust and air pollution, increased noise and vibrations, unmet expectations etc.

3. FRAMEWORK FOR STAKEHOLDER ENGAGEMENT

3.1 Requirements of the Guinean State

This section summarises national requirements for stakeholder engagement that are integrated into general and subject-specific laws and regulations in the areas of mining, environment, land use, and others, such as:

2011 Mining Code, amended in 2013, that includes various provisions related to the engagement of stakeholders during all phases of a mining project;

The 1992 Land Tenure and Property Code that regulates matters related to property;


The 2006 Local Communities Code which main result is that the local community, as a legal entity, must be involved in the issues related to the interests of the groups affected by the implementing project;

The 1989 Environmental Protection and Enhancement Code that regulates impact studies project incidence on Guinean ecological balance, the framework and human quality of life and the incidence of environmental protection in general;

Mining Agreement between CBG and Guinea.

3.2 IFC Performance Standards

According to IFC Performance Standard 1 on the Assessment and Management of Environmental and Social Risks and Impacts, stakeholder engagement is an ongoing process that involves stakeholder analysis and planning, disclosure and dissemination of information, informed consultation and participation,

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grievance management, external communications and ongoing reporting to Affected Communities.

3.3 Underlying Values

In alignment with country policies and the IFC Performance Standards, CBG is committed to promoting and ensuring effective stakeholder engagement based on values which include inclusiveness, gender sensitivity, enabling effective participation, grievance management, commitment to documentation, and company commitment to stakeholder engagement.

4. CBG STAKEHOLDERS

4.1 Stakeholder Identification

The IFC defines stakeholders as “persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, community/religious leaders, community-based organisations, the academic community, or other businesses. These groups may also be referred to as external stakeholders”.


An identification of a wide array of potential stakeholders related to CBG projects was carried out during earlier stages of the projects, based on ESIA's and other studies. Experience over the years has enabled CBG to reassess and refine the list of stakeholders relevant to its stakeholder engagement plans.

External stakeholders include directly affected communities, national and local government entities, national and international organisations, media outlets, research institutions, other businesses, and contractors.

Community-based associations and other informal groups of women, youth, Persons with Disabilities (PWDs) or others representing the interests of vulnerable groups identified in the SEP are also considered.

In addition to directly affected communities, there are communities within CBG’s area of influence which have the potential to be indirectly affected by cumulative impacts, by virtue of their unmet expectations of the company and so forth.

The list of CBG stakeholders is updated annually.

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4.2 Mapping of Stakeholders

The mapping analysis assesses the impact of the project on stakeholders, including stakeholders who are not directly affected but have influence and interest which could affect the operations.

The analysis consists of understanding, first, the impacts that the project has on stakeholders. Secondly, it is necessary to analyse and map stakeholders who are not affected by CBG operations but that have influence and interest which could affect the operations. By mapping stakeholders in this way, CBG is able to assess the motivation of stakeholders and determine the level and type of engagement required with each stakeholder, as well to plan targeted engagement activities accordingly

Based upon the results of the stakeholder analysis, the following stakeholders have been identified as key, among others: directly affected communities and their representatives, Ministries, local government representatives, NGOs, Lenders.

5. STAKEHOLDER ENGAGEMENT PROGRAM


5.1 Stakeholder Engagement Activities Implemented to Date

Engagement with directly affected communities. To date, the engagement process has involved disclosure of project information, consultation and participation linked to the phases of the project cycle implemented to date: scoping, planning, construction and operations.

- Regular consultation meetings with mine, port and rail communities to provide information and address stakeholder concerns and to define subsequent engagement strategies.
- Methods included presentations, workshops/discussions and road shows.

Engagement with government and local authorities.

- Consulted with Ministries, Governors, Prefects, Sub-prefects and Mayors and their respective teams.
- Local authorities involved in the management and resolution of grievances in the areas of CBG operations.

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Engagement with local NGOs and CBOs / Civil Society.

- Engagement process strengthened through community consultation frameworks and periodic and focused meetings.
- Engagement through community development programs.
- Engagement activities specific to resettlement and livelihood restoration are framed in the RPF and in the LRPs and form part of CBG's global stakeholder engagement strategy.
- Disclosure of project ESIA's has made it possible for stakeholders across the board to be informed about foreseen project risks and impacts; such documentation continues to remain publicly available on the CBG website for stakeholders' further reference.

5.2 SEP 2022-25 Objectives

The objectives of this 2022-25 SEP are to:

- Promote and provide effective means for adequate engagement with project affected communities and other stakeholders throughout the project cycle, and address their concerns accordingly.
- Obtain and maintain community support for the project and social licence to operate by engaging in different forms of dialogue with stakeholders on the information they need to make informed decisions.
- Promote the improvement of environmental and social performance through effective engagement.

5.3 Planned Stakeholder Engagement Activities


Stakeholder engagement activities are aligned with the phases of the project cycle: design, construction, operation, downsizing/decommissioning and divestment and are proportional to the risks and impacts of the project.

CBG proceed to the elaboration of its stakeholder engagement action plan annually including detailed planning of the stakeholder engagement activities.

5.4 Topics to be Covered in Stakeholder Engagement Activities

Key topics of interest include:

Disclosure and Dissemination of Information: operations, environmental and social risks and impacts, exploration, rehabilitation, resettlement and livelihood

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restoration, environmental impacts, dredging, infrastructure maintenance and rail safety

Consultation and Participation: community's place and role in mine, rail and port activities, community participation in environmental and livelihood restoration monitoring processes

Collaboration: collaborative implementation of mitigation measures, community participation in rehabilitation, improving LRP, dredging, quarries, participation in railway safety awareness activities, surveillance and rehabilitation

Grievance Management Mechanism (GMM) and Community Assistance Requests Management (CARM) Procedure: GMM, grievance resolution, follow-up and closure, CARM and Community Development Programs

Reporting to and Gathering Feedback from Affected Communities: socioeconomic changes, environment, biodiversity, noise, vibration, air and water quality and blasting

5.5 Levels, Methods, Frequency and Other Considerations for Effective Stakeholder Engagement

Levels. Occurs at all levels, from national to community level and involves all identified CBG stakeholders.

Methods.


- Face-to-face methods
- Written, visual, audio, social and other media

Communications are in the language that stakeholders are comfortable with and cater to illiterate members of the community who will rely on these. Written material will be produced in formats that meet the community literacy levels.

Frequency. Determined by the level of impact on, interest in and influence over CBG's operations.

5.6 Special considerations for community level engagement.

The project engages with formal and informal leaders that hold the community's trust and by whom they feel represented, particularly in relation to vulnerable members of the community.

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The company will, through perception studies and/or baselines studies:

- Identify leaders (formal and informal);
- Rate the quality of the relationship between CBG and the community;
- Identify challenges that need to be overcome through stakeholder engagement;
- Establish the location in which meetings will be generally held within the community; and
- Identify key vulnerable groups, the proportion of the population they each represent and potential associations or groups representing them in the community, along with the location and time of preference in which to meet, should separate meetings be required

For informal leaders, the following should be considered:


- Level of influence in the community
- Ability to communicate with the community
- Level of community trust in the leaders
- Level of involvement in managing community concerns or complaints
- Ability of leaders to understand external messages conveyed

Gender perspective. CBG will work towards the effective inclusion and participation of women in community engagement activities through sensitisation and information, all the while ensuring that women are not considered as one common group, recognising that different aspects of gender inequality manifest themselves differently over the course of women’s lives and circumstances.

Other vulnerable groups. Engagement activities will include differentiated measures to allow the effective participation of those identified as vulnerable. The CR team will convene stakeholder engagement meetings, taking into consideration vulnerable groups’ particular conditions, ensuring that this engagement occurs in places where they feel comfortable and where they can speak freely.

Additional general considerations.

Cultural norms and protocol will be embedded into all forms of communication and engagement with stakeholders. These include speaking in the local language, respecting local cultural protocols, traditional holidays and community ceremonies, as well as locations which are held sacred or of value to the community, and assessing if there are any additional special norms that should be observed in each community.

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6 GRIEVANCE MANAGEMENT MECHANISM

The purpose of the Grievance Management Mechanism (GMM) is to manage any and all community grievances. The scope of the GMM includes any potential grievances which could arise as a result of day-to-day operations of CBG and its contractors, as well as the resettlement and livelihood restoration processes associated with CBG operations. The GMM is open for use by any external stakeholder for any matters related to affected communities.

The Grievance Management Mechanism (GMM) ensures grievances are received, registered and resolved within a defined timeframe, and that appropriate corrective actions are implemented.

Grievances can be submitted to the CR Team, to other CBG employees or via a third party (including local authorities, contractors, etc.).

Grievances are classified as follows:


- **Level 1 - Grievances with no impact** - need for clarifying information, accelerating the delivery of delayed community activities, etc., and are easily resolved given their simplicity.
- **Level 2 - Grievances with limited impact** - refer to situations of limited impact and severity that do not cause major harm to communities.
- **Level 3 – Grievances with significant impact** – refer to situations that cause major harm to communities, such as the loss of major community assets or the pollution of community natural resources.

Grievances are also identified by sector and sub-sector categories, namely:

- **Safety:** blasting/cracks, road and rail safety, maritime safety
- **Environmental:** air/water pollution, air quality/dust, noise, vibration, others
- **Socio-economic** (excluding resettlement): water access, electricity access, employment, basic social infrastructure
- **Resettlement / land occupation:** replacement infrastructure, compensation, LRP, survey, asset inventory, eligibility

SUMMARY TABLE OF GRIEVANCE PROCESSING TIMES

Reception, classification, registration of the grievance in the grievance register	3 days
Acknowledgement of Receipt and Registration (ARR) of the grievance issued to the complainant	2 weeks

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For less complex grievances: investigations, analysis and processing, implementation of corrective actions and closure	1 month
For more complex grievances: investigations, analysis and processing, Implementation of corrective actions and closure	3 months
For more complex grievances for which implementation of corrective actions and closure cannot be completed within three months	3 months plus action plan

Access and use of the GMM will not incur any costs or consequences. The use of the CBG GMM does not preclude the use of other judicial or non-judicial measures by affected populations.

Important points which will be addressed in the period 2022-2025 to maximize the possibility of use and effectiveness of the GMM are ensuring broad dissemination and understanding of the GMM at all levels of the community, including local authorities, and improving efficiency in the management of grievances and responsiveness to communities.

Information about the GMM has been and will continue to be disseminated amongst affected communities, including vulnerable groups, and local authorities.

7 PARTICIPATION OF STAKEHOLDERS IN ENVIRONMENTAL MONITORING

Environmental Monitoring Committees are created and managed jointly by CBG and the affected communities for participatory environmental monitoring.

The objectives of the participatory environmental monitoring activities are to:

- a) Enable CBG to improve the quantity and quality of information on key environmental issues and impacts to which the communities have access;
- b) Avoid false claims and misinformation in communities about CBG operational impacts;
- c) Manage disagreements between the company and the community so as to avoid the escalation of conflict; and
- (d) Empower communities to take responsibility for their own development.

Environmental issues to be covered are blasting, vibration, noise, dust and air quality and water quality.

An Environmental Monitoring Committee will be created in each area and members will be trained to effectively assume responsibilities. The Committee will be made up of:

- Representatives of the areas designated by the communities themselves
- Representatives of the CBG environmental monitoring team
- Representative(s) of the CR Team
- Representative(s) of local authorities decentralized services

CBG will ensure that the Committees represent different social groups, including vulnerable groups.

Quarterly meetings will be held with the Committees at the community level to carry out these activities. Results will be shared in a non-technical and culturally appropriate manner with all communities concerned.

8 RESOURCES


Engagement activities are delivered by a multi-disciplinary team with a range of skills. The Community Relations (CR) Team is responsible for the timely management of stakeholder engagement activities in line with the strategic objectives of CBG and in compliance with allocated budgets. The management functions are therefore designed to ensure that the team is organised across the different geographic areas associated with CBG operations (mine, rail and port), in line with stakeholder engagement workloads at different points in time.

9 DOCUMENTATION, MONITORING AND REPORTING

All forms of engagement with stakeholders are systematically documented by CBG staff implementing activities with company stakeholders. Copies of minutes are produced and shared with participating stakeholders, as relevant.

CBG monitors progress and effectiveness of stakeholder engagement activities.


- Progress is tracked by comparing plans against activities implemented by the CR Team.
- Effectiveness is assessed through different channels that include feedback through community meetings, grievances reported through the GMM and baseline/perception surveys.

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To monitor implementation and effectiveness of the SEP CBG assesses indicators related to community meetings, topics discussed and knowledge and understanding of the SEP.

All the information resulting from these processes and tools are used for internal reporting to senior management on the progress and effects of stakeholder engagement activities and suggesting adjustments in management systems and stakeholder engagement activities, as relevant.

To constantly improve the collaborative relationship established with external stakeholders and ensure their participation, CBG puts in place reporting mechanisms to present stakeholders the results obtained from the activities carried out and to discuss what they mean. It can be done through meetings, social events, presentation/ demonstration of project activities, community consultation frameworks meetings etc.

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