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CBG BAUXITE MINE ENVIRONMENTAL AND SOCIAL MONITORING REPORT

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ENVIRONMENTAL AND SOCIAL MONITORING REPORT

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Status of ESAP items (as of May 2024)

ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AAQ	Ambient Air Quality
AIDS	Acquired Immune Deficiency Syndrome
AGEE	Agence Guinée des Évaluations Environnementales (Guinean Agency for Environmental Assessments)
AMR	Annual Monitoring Report
ASI	Aluminium Stewardship Initiative
AZNEC	Australian and New Zealand Environmental Council
BAP	Biodiversity Action Plan
BMEP	Biodiversity Monitoring and Evaluation Plan
BMS	Biodiversity Management System
BuMS	Burner Management System
CAO	Compliance Advisor Ombudsman
CBG	Compagnie des Bauxites de Guinée
CDP	Community Development Plan
CECI	Centre d'Etude et de Coopération Internationale (the NGO managing all livelihood restoration activities, under the Hamdallaye and Fassaly Foutabhé RAP, on behalf of CBG)
CFB	Chemin de Fer de Boké
CHMP	Cultural Heritage Management Plan
COBAD	Compagnie de Bauxites et d'Alumine de Dian Dian
CR	Community Relations
CRPF	Compensation and Livelihood Restoration Policy
CTA	Common Terms Agreement
DAF	Dissolved Air Flotation
DFC	Development Finance Corporation
DMP	Dredging Management Plan
EHS	Environment, Health and Safety
EMoP	Environmental Monitoring Programme
EMPs	Environmental Management Plans
EMTL	Environmental Monitoring Team Leader
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GAC	Guinea Alumina Corporation

Acronym	Meaning
GBV-SH	Gender Based Violence and Sexual Harassment
GIE	Economic Interest Group
GIIP	Good International Industry Practice (GIIP)
GIS	Geographic Information System
GM/GMM	Grievance Mechanism / Grievance Management Mechanism
GoG	Government of Guinea
GPS	Global Positioning System
Ha	hectare
HIV	Human Immunodeficiency Syndrome
HR	Human Resources
HSE	Health, Safety and Environment
HSE&S	Health, Safety, Environment & Social
HSECQ	Health, Safety, Environment, Communities and Quality
H&S	Health and Safety
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IGA	Income generating activity
ILMP	Integrated Landscape Management Plan
IMS	Integrated Management System
KBA	Key Biodiversity Area
KPIs	Key Performance Indicators
LDP	Land Disturbance Permit
LR	Livelihood Restoration
LRP	Livelihood Restoration Plan
M&E	Monitoring and Evaluation
MoC	Management of Change
MRCCP	Mine Rehabilitation and Conceptual Closure Plan
MS	Management System
MUOA	Multi-User Operator Agreement (regarding the railway capacity expansion project)
MS	Management System
NoCo	North of Cogon
NO _x	nitrogen oxides
NGO	Non-Governmental Organisation
N&V	Noise and Vibration
NVMP	Noise and Vibration Management Plan
OHS	Occupational Health and Safety
PAP	Project-Affected Person

Acronym	Meaning
PbP	Plateau-by-Plateau
PMP	Probably Maximum Precipitation
PRAMS	Income Generating Activities Programme
PS	Performance Standard
PWDs	Persons With Disabilities
RAP	Resettlement Action Plan
REB	Réseau Environnement Bauxite (The Bauxite Environment Network)
RfPs	Requests for Proposals
SEP	Stakeholder Engagement Plan
SMB	Société Minière de Boké
SMPs	Social Management Plans
SNAPE	National Water Supply Point Management Services
SOP	Standard Operating Procedure
SO ₂	sulphur dioxide
ToR	Terms of Reference
WBG	World Bank Group
WMF	Waste Management Facility
WMP	Water Management Plan
WWTP	Wastewater Treatment Plant

EXECUTIVE SUMMARY

Background information

Ramboll UK Limited ('Ramboll') was commissioned in September 2016 by Compagnie des Bauxites de Guinée ('CBG') to undertake environmental and social (E&S) monitoring of the 18.5 million tons per annum Mine Expansion Project (the 'Phase 1 - Expansion Project') in Guinea.

In fulfilling the role of the Lenders' Independent Environmental and Social Consultant (IESC), Ramboll has a duty of care to the Lenders to the Project, including the Policy Lenders comprised of the International Finance Corporation (IFC), US International Development Finance Corporation (DFC), formerly Overseas Private Investment Corporation, and UFK/Euler Hermes (UFK), together the 'Policy Lenders', and a consortium of commercial banks (collectively, with the Policy Lenders, referred to as the 'Lenders').

The IESC's scope of work allows for two in-country monitoring visits each year during the construction of the Phase 1 Expansion Project and/or during the construction of the Sangarédi to Kamsar Railway Upgrade Project associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes the monitoring of health, safety, environmental and social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG's Health, Safety, Environment, Communities and Quality (HSECQ) Department and are managed under the same E&S management system.

This report provides the findings of an in-country site visit undertaken from the 13th May to the 17th May 2024 (the 'May 2024 site visit'), during which a series of inspections, meetings and interviews were undertaken. The meetings/interviews were held in person and involved representatives from the IESC, CBG, CBG contractors, external stakeholders, and some Lenders. Following the site visit, Ramboll organised an online meeting on 22nd May 2024 dedicated to air quality. The findings from the site visit and the supplementary online meeting are reflected in this report.

Overview

Overall, CBG continues to make good progress with its management of health, safety, environmental (including biodiversity) and social matters. HSE and Social matters are seen as a priority at the highest level of management and the HSECQ teams are well supported. The HSECQ teams have expanded in number with key E&S positions filled and training programmes/additional equipment resources continue to enhance capabilities across the teams. Actions agreed with Lenders and specified in a comprehensive Environmental and Social Action Plan, have been largely closed out with the exception of a small number of long lead time residual issues that CBG continues to work to close. Notably, CBG has also recently obtained certification from the Aluminium Stewardship Initiative.

The IESC recognises the efforts made by CBG and progress made, however despite the steady progress in the right direction, the nature, size and setting of CBG's operations creates many HSE&S challenges and areas for improvement remain. This report aims to capture areas of progress, typically via the update of earlier findings. Thus, the findings below relate to new findings from the May 2024 site visit, in addition to findings made during previous trips that are yet to be closed.

High significance findings

High significance findings have been identified that require immediate attention to mitigate their potential adverse impacts. Below we present a summarized report of these findings, segmented by the Performance Standards (PS) from which they derive. More details on each finding are provided in the related PS section of this report. Each finding in the report is assigned a unique code that reflects the month and year when it was initially identified or updated (some of the findings below remain open from previous site visit reports).

Assessment and Management of Environmental and Social Risks and Impacts (PS1)

- *LDP E&S impact assessment* (May 2024_RE_006): Community feedback has prompted a review of the Land Disturbance Permit (LDP) process, and a complete evaluation by CBG of the Mbourore LDP's environmental and social impact assessment remains pending to assess the compliance of the process with PS1 requirements.
- *Stakeholder Engagement* (Dec 2022_013): CBG has started a pilot on environmental results disclosure to communities, however, hasn't started to share the results with the communities as per the environmental disclosure procedure.

Labour and Working Conditions (PS2)

- *Occupational dust and noise exposure* (May 2024_HS_001): Occupational exposure dust and noise monitoring process and monitoring results should be shared with the H&S teams and preventive measures must be defined and adapted at the workstations.
- *Lifting equipment* (May 2024_HS_002): The procedure for the use of lifting equipment wasn't clear to the workers met and CBG should share the rules concerning lifting equipment to all employees, in particular the H&S teams.
- *Communication at the mine* (May 2024_HS_003): The radio used to broadcast simultaneously on all the channels in the mine, which is particularly important in emergency situations, was out of service and needs prompt replacement.
- *Alerts from the trucks facial recognition system* (May 2024_HS_004): Mine Control Centre operators don't systematically check all alerts from the trucks facial recognition system, which is intended to alert control centre operators of tired drives/use of phones whilst driving. An investigation on the effectiveness of this system and on reasons why all alerts are not systematically checked must be conducted.
- *H&S culture and H&S knowledge of interviewed contractor* (May 2024_HS_005): A contractor met at N'Dangara railway wagon loading area was unaware of CBG's golden rules and emergency assembly points. CBG needs to conduct repeated awareness campaigns and verify that contractors are prepared to adhere to CBG rules, particularly as contractors and contractors' personnel frequently change.
- *Traffic on mine haul roads* (2024_HS_006): Workers (contractors) often walk on the mine roads to get back to the office (especially for breaks) contrary to CBG rules. CBG should intensify inspections and apply sanctions to its contractors in the event of non-compliance with H&S rules.
- *Working Conditions of the Train Drivers* (Nov 2023_HS_002): The conditions of the train drivers need to be improved, including ensuring breaks during journeys and limiting journey times to a maximum of 12 hours. Moreover, thorough emergency drills should be conducted, including the development and testing of radio alert codes. The IESC notes close out of this finding is in progress, with the drill expected to be completed after the IESC visit in May 2024. *Post site visit note: CBG informed the emergency drills have been conducted and a radio alert code has been tested. As part of the next site visit, the IESC will look at the drill register to ensure this finding can be closed.*
- *Incident Investigations and Root Cause Analysis* (June 2023_012): An action plan addressing all remaining issues related to the last railway fatality needs to be finalized, focusing on improving Health & Safety information exchange among workers, clarifying and testing new safety distances from the tracks, and enhancing communication between the Central Control Facility (CCF) and all personnel near the railway. This plan should be developed in collaboration with all parties involved on/near the railway. In May 2024, a new automation system is being implemented and training has been provided but the working conditions are the same.

- *Workers Engaged by Third Parties - camps* (Nov 2023_SO_005): Worker Camp Conditions at the Tinguilinta camp show several non-compliances, particularly regarding overcrowding and lack of facilities. CBG is tasked with prioritizing improvements to align the camp conditions with best practices and international guidelines.

Resource Efficiency and Pollution Prevention (PS3)

- *Recalibration of the Hydro/Groundwater Balance Model* (Nov 2023_EN_001): CBG's plans to recalibrate the Water Balance Model for Sangarédi are well behind schedule, delaying the execution of mitigation strategies needed to ensure water availability for communities and ecosystems as mining expands. Although CBG has undertaken actions to move further on this item, the recommendation to prioritise recalibration of the model is still applicable.
- *Communities' Water Resources* (June 2023_016): The IESC recommends stronger coordination with SNAPE and the establishment of a communication protocol between CBG and SNAPE on water resource monitoring.
- *Surface Water Discharge - Kamsar* (Nov 2023_EN_014): High sediment content in Kamsar's 'Grand Canal' surface water and stormwater drainage system has the potential to adversely affect off site aquatic receptors. Regular dredging of the canal may not be sufficient; thus, an engineering solution, for example sediment traps, is recommended to adequately address suspended sediment concerns.

Community Health, Safety, and Security (PS4)

- *Community Health and Safety – Mine Site Safety* (Nov 2023_SO_010): The IESC recorded a fatal incident at the Sangarédi mine's sedimentation basin which was not reported in a timely and detailed manner to Lenders, pointing to a significant lapse in incident reporting and communication protocols. The recommendation is for CBG to establish thorough inspection programmes to regularly check the integrity of safety measures for all sedimentation basins and develop a robust incident reporting procedure. CBG has reported preparing an updated tracker for internal use which includes specific details on notification requirements, timeframes and internal reporting. However, although requested, this was not shared with the IESC.

Performance Standard 5 (PS5)

- *Fassaly Fouthabé's mitigation measures* (May 2024_RE_001): Fassaly Fouthabé's request to be resettled in October 2022 was declined by CBG, despite IESC's recommendation for a cumulative impact analysis looking at the multiple stressors affecting Fassaly Fouthabé, leading to further discussions between CBG and the village and agreement on new mitigation measures, which need to be shared with the IESC.
- *"Brownfield" and "high voltage corridor" LRP* (May 2024_RE_002): A Livelihood Restoration Plan (LRP) needs to be developed for two compensations events, "brownfield" and "high voltage corridor" (totalling 132 PAPs). At a minimum these PAPs must be included in an existing LRP.
- *MUOA LRP* (May 2024_RE_003): The informal non-agricultural economy, including small businesses, seems to be affected by the MUOA. It is not clear whether asset compensation addresses the revenue loss. Thus, CBG needs to supply the compensation documentation to the PAPs met in Kamsar.
- *Mbourore Plateau LRP* (May 2024_RE_007): The IESC notes that while the Land Disturbance Permit process has been delivered and compensation paid for the Mbourore Plateau, the Livelihood Restoration Plan for the plateau remains incomplete and therefore has not informed the LDP.
- *Hamdallaye Resettlement -Security of tenure* (June 2023_031): Hamdallaye's unsecured land tenure is preventing final acceptance and formal transfer to of responsibility for the land to local

community. Thus, formalization of land tenure agreements is required to complete the resettlement process.

- *Livelihood Restoration Lacks Assessment* (June 2023_035): The lack of assessment to determine the status of livelihood restoration for the Hamdallaye and Fassaly Fouthabé PAPs is delaying closure of the programme. Interim support, such as food assistance, should be planned until revenue-generating Livelihood Restoration Programme activities are confirmed to have restored livelihoods.
- *Delays in LRPs* (June 2023_036): The delayed initiation of several LRPs (Kankalaré, Thiapikouré and Kagnaka) has adversely affected communities, suggesting a need for renewed interim support. Thus, renewed interim support (food assistance) is recommended until LRP activities yield revenue for the PAPs.
- *Lack of Procedure for Land Rehabilitation* (June 2023_042): Despite the Mine Rehabilitation and Conceptual Closure Plan (MRCCP), there is no formal procedure for retrocession of rehabilitated land involving the community. A procedure needs to be established immediately, incorporating best practice guidance described in the MRCCP.
- *Cumulative Impacts* (Dec 2022_047): the effects of cumulative impacts resulting from mining (opening of successive plateaus) and associated activities has not been assessed for several communities. As a minimum, a land balance assessment must be prepared for villages listed as potentially affected by a physical resettlement by 2022 in the 2016 Resettlement Policy Framework, in coordination with the biodiversity team.
- *Unstaffed School at Fassaly Fouthabé* (March 2022_032): A school constructed as per the RAP remains unstaffed, preventing its utilization. CBG should continue working with the local education authority and explore community-driven solutions to staff the school.

Performance Standard 6 (PS6)

- *Woodland and Forest LDP Requests* (May_2024_BI_002): The current LDP process protects gallery forest well, but not secondary forest and woodland. Recent studies have identified the importance of these areas to chimpanzees. Thus, the Land Disturbance Permit process should be updated to reflect the importance of these areas and ensure sufficient, connected areas are retained as far as possible.

Scope Limitations and Exceptions of the Assessment

The IESC has performed this monitoring audit in accordance with the scope of services outlined in its contract (CBG-5G-EXP1-019-G-S – Amendment No. 009-V1).

Throughout the May 2024 site visit, CBG cooperated fully and responded to the IESC's requests in relation to its monitoring work. The IESC and its reporting is not subject to any material limitations, however, the findings expressed in this report are based primarily on information gathered prior to and at the time of the site visit, and from the document shared with the EISC following the site visit.

1. INTRODUCTION

As a condition of the Common Terms Agreement (CTA), Compagnie des Bauxites de Guinée ('CBG') is required to appoint an Independent Environmental and Social Consultant (IESC) to undertake environmental and social (E&S) monitoring of the 18.5 million tons per annum Mine Expansion Project (the 'Expansion Project') in Guinea, and commissioned Ramboll UK Limited ('Ramboll') in September 2016 to fulfil this role.

In fulfilling the role of the Lenders' IESC, Ramboll has a duty of care to the Lenders to the Project, including the Policy Lenders comprised of the International Finance Corporation (IFC), US International Development Finance Corporation (DFC) and UFK/Euler Hermes (UFK), together the 'Policy Lenders', and a consortium of commercial banks (collectively, with the Policy Lenders, referred to as the 'Lenders'). This report has been prepared for the attention of CBG and Lenders.

The IESC's scope of work allows for two in-country monitoring visits each year during construction of the Phase 1 Expansion Project and/or during the subsequent Sangarédi to Kamsar railway upgrade project associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes the monitoring of Health, Safety, Environmental and Social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG Health, Safety, Environment, Communities and Quality (HSECQ) Department and are managed under the same E&S management system.

This report focusses on CBG's HSE&S performance against Project commitments made in E&S Management Plans, the Environmental and Social Action Plan (ESAP) (as amended in September 2021), loan agreements and applicable Project Standards, specifically the IFC Performance Standards on Environmental and Social Sustainability (2012) and applicable World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines, through the findings of the in-country monitoring visit undertaken in May 2024 and subsequent online meeting (Air Quality meeting on 22nd May 2024).

During the in-country site visit, the IESC was able to visit CBG's facilities and conduct face-to-face meetings/interviews with CBG representatives, CBG's contractors and other stakeholders, including the affected communities, and inspect facilities and working areas for ground-truthing purposes. The IESC was able to hold detailed technical discussions with CBG representatives and its contractors.

Such meetings were held, primarily, with CBG staff from the HSECQ department as follows:

- Reporting and Sustainable Projects Service director;
- Health, Safety and Environment (HSE) team including those responsible for the audit programme, environmental management and monitoring;
- Biodiversity Manager and team members;
- Environmental and Monitoring Team Leader (EMTL) and team members;
- Resettlement Specialist and team members; and
- Community Relations (CR) Manager and team members.

In addition to the above, representatives from other departments/entities were interviewed or participated in meeting discussions on specific issues, as follows:

- Resource Use and Energy Efficiency Manager;
- Management of Change Manager;
- China Railway Construction Corporation (CRCC) worker camp representatives;
- Worker representative (Union) met at Madina Boroboff housing; and
- Representatives from the Horè Laafou community, from the Hafia community and from the LRP Committee of Paragogo.

The IESC team performing the site visit was composed of five experts with the following expertise: i) health and safety; ii) biodiversity; iii) environment (excluding biodiversity); iv) resettlement; v) social (excluding resettlement). The IESC team of five was accompanied by two IFC and two Societe Generale personnel.

During the site visit, the IESC team was granted full access to CBG documentation and received good cooperation from the CBG HSECQ Department and other CBG departments. Review of documentation typically entails the following documents: Presentation from CBG on the ESAP implementation status, the HSECQ Management System documents (notably the agreed E&S management plans), the latest environmental monitoring results provided by CBG, and the most recent Borrower's E&S Compliance Certificates (for Q4 2023 for this site visit report).

During this site visit, the IESC held detailed discussions on the following topics:

General:

- Status of the MUOA Projects;
- HSECQ structure and resourcing; and
- Current short-term mine plans and proposed CBG exploration activities within the South Cogon Concession Area and North Cogon Concession Area (LDPs).

HSE:

- Status of HSE Management Systems;
- H&S metrics, performance and training;
- Audit and inspection programme;
- Contractors management;
- Training management and programme;
- Surface water quality in the CBG concession;
- Implementation of Management Plans, including those relating to: Air Quality, Noise and Vibration, Waste, Hazardous Materials, Dredging, Resource Use and Efficiency, Water Quality, Environmental Monitoring, Contractor management; and
- Management of Change (MoC).

Social:

- Community Relations and Resettlement personnel resourcing and capacity development;
- Performance of the IsoMetrix customisation software platform for managing environmental and social (including biodiversity) risks;
- Betafence installation and communities' acceptance;
- Labour and working conditions, worker grievance management and workers' accommodation;
- Contractors Management;
- Progress on the participatory environmental monitoring; and
- The new workers' accommodation (social housing) in Madina Boroboff.

Resettlement:

- The implementation status of the Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP);
- The implementation status of the Livelihood Restoration Plans (LRPs) and feedback of a few beneficiaries PAPs from the MUOA and Thiapikouré Plateau;
- The feedback of the Communities of Paragogo and Afia on Livelihood Restoration Programmes and recent land acquisitions (Plateau Mbouroré and Plateau Kagnaka);

- The status of the Monitoring and Evaluation Plan;
- The mitigation strategy for the PAPs which have not received compensation for land, as part of the Paris resettlement workshop action plan;
- PS5-related grievances;
- The land disturbance permit procedure; and
- Resettlement implementation capacity.

Biodiversity:

- Resourcing levels, organisation and structure;
- Land rehabilitations;
- Biodiversity protection measures; and
- Integrated Landscape Management Plan (ILMP) and its action on the ground.

Following the site visit, an additional online meeting, allowing for more detailed discussions, was held on 22nd May 2024 to discuss the progress made in the implementation of the Air Quality Management Plan. This report reflects the update provided on the 22nd on the Air Quality topic.

The site visit itinerary is provided in Appendix 1.

This report focuses on the findings arising from the site visit and the subsequent online meeting, however, it also refers to earlier findings, reflecting the ongoing nature of many ESAP deliverables and the IESC's continuing role in monitoring CBG's HSE&S performance.

1.1 Project Standards

In accordance with the IESC's Terms of Reference (ToR), the Project was assessed against the following standards and guidelines:

- Applicable laws and regulations of Guinea;
- Specific commitments made by CBG and requirements specified in the ESAP;
- IFC Performance Standards on Environmental and Social Sustainability (2012), specifically:
 - 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; and
 - Performance Standard 8: Cultural Heritage.
- WBG EHS Guidelines applicable to the Project.

IFC Performance Standard 7 on Indigenous Peoples was excluded from the scope of the monitoring on the basis that no Indigenous Peoples are affected by the Project.

2. STRUCTURE OF THE REPORT

Section 3 provides a very brief description of the Expansion Project status (section 3.1), the MUOA Project status (section 3.2) and other CBG activities: At the time of the site visit in May 2024, the other CBG activities includes the upgrade of the train tracks (section 3.3), activities in relation to South of Cogon and North of Cogon (section 3.4), and the CAO Process (section 3.5). Section 4 presents the recruitment and team composition updates at CBG. Section 5 describes how different levels of significance are attributed to issues highlighted in the report. The report is then structured around the seven IFC Performance Standards applicable to the Project, as listed above, and supporting WBG EHS Guidelines. The 'Open findings' tables, located at the end of each section of the IFC Performance Standard, list the key findings identified during the May 2024 site visit, the 'open' identified issues from previous site visit reports, and the IESC's recommendations to address these key findings. Findings remain 'open' if no/insufficient progress has been made since the last site visit, or the IESC did not have an opportunity to revisit the issue.

[Appendix 2](#) provides a status update for the consolidated list of 'closed' or 'superseded' issues during the May 2024 site visit and/or subsequent meeting. Explanations on the reason for closing the issues are given. Issues are typically categorised as superseded when an issue has evolved in such a way that the original issue is no longer relevant, or the issue has evolved and replaced by an updated finding. In this situation, if an issue is categorised as superseded following the site visit in scope for this monitoring report, an update of the issue has been provided in the main body of this report, and the previous issue as listed in [Appendix 2](#) includes a reference to this updated text.

Within this report, the IESC has endeavoured to provide a balanced opinion, providing examples of good international industry practice. However, due to the compliance-focused nature of this report, the broad range of aspects covered, and large amounts of review documentation made available, and also for the sake of brevity, the report is predominantly focused on areas for improvement.

3. PROJECT STATUS

This chapter provides a brief description of the MUOA Project and other CBG activities ongoing at the time of the site visit in May 2024.

3.1 Status of the Expansion Project

As reported by the IESC in previous monitoring reports, the construction/commissioning of the Expansion Project is complete.

3.2 Status of MUOA Project

The aim of the MUOA Project is to increase the capacity of the rail from Sangarédi to Kamsar to transport 51 Mt/year. During the previous site visit (November 2023), the overall progress of the MUOA Project was reported at 77% (as of September 2023). Progress in May 2024 is reported to be 83.26% complete overall, with the progress details for each key tasks as per below:

- Installation of permanent signalling and training: 90% complete (up from 76% in November 2023) with a scheduled end date (acceptance test) now planned for October 2024;
- Construction of the locomotive maintenance workshop: 13% complete with a scheduled completion now anticipated for December 2025;
- The delivery and commissioning of the reconditioned SD40 locomotives, under the Phase 1 scope: 90% complete, with 21 locomotives already in operation and the reception of the last locomotive planned for June 2024;
- Recruitment and internal training of new staff, under the Phase 1 scope: 89% with a completion date planned for December 2024;
- Purchase of track maintenance equipment: 86% completion, with an end date planned for December 2024.

3.3 Upgrade of the train tracks

CBG is in the process of upgrading the railway infrastructure connecting Sangarédi to Kamsar. This project is being undertaken by the appointed contractor CRCC, which uses two accommodation facilities for its personnel. These facilities include the Tinguilinta and Boké camps. The Tinguilinta camp has a capacity to house 200 workers, whereas the Boké camp is equipped to accommodate up to 600 workers. Both facilities were observed during the IESC's visit in November 2023 and in May 2024, the IESC revisited the Tinguilinta camp, which was then occupied by approximately 80 workers (increase from the 30 workers occupying the camp in November 2023). And, in November 2023, the Boké camp had around 300 workers in residence.

3.4 Status of South of Cogon and North of Cogon activities

3.4.1 Current mining plan

CBG's internal approval process prior to the opening of new mining areas is governed by its Land Disturbance Permitting procedure and the issuance of a Land Disturbance Permit (LDP) prior to start of land stripping/mining. At the time of the site visit in May 2024, the status of initiated LDPs was as follows:

Plateau	Status of LDP	Status of activity at the plateau
LRG [?] prospection campaign for the raffinery	Delivered	Geological prospection points in Bowés. All HSEC activities have been completed for this LDP.
South of Cogon	Delivered	Prospecting campaign ongoing. All HSEC activities have been completed for this LDP.
Mbouroré Plateau	Delivered	The LDP has been delivered and the sequential stripping process has been agreed. The LRP is being prepared and most compensation payments have been completed (except from the refusal and absent cases).
Hamdallaye triangle	Delivered	An addendum to the existing permit was performed, following the request of the mine operations for an extension of the permit's area. As part of the mitigation measures identified for this addendum, a community access road was built.
Cleanup of the 30KV power line	Ongoing	This LDP aims to clear the power line from trees to avoid damage of the line. The power line connects the power plant to the Cogon station and the Parawi station. Inventories of communities' compensations are ongoing, and compensation are yet to be paid.
Rail rehabilitation	Ongoing	The rail rehabilitation LDP requires a 25m Right of Way. Inspections are ongoing to identify the needs for communities' compensations within the Right of Way.
Parawi 3b Plateau	Suspended	No major development in relation to this LDP since the November 2023 site visit report. This LDP is suspended because of the speculative construction of buildings and commencement of economic activities in the affected area. Biodiversity and monitoring aspects are complete.

As mentioned in the previous IESC report, the mining of the Mbouroré Plateau presents a number of environmental and social sensitivities (proximity to gallery forests and villages). At the time of the site visit in May 2024, the IESC requested access to the finalised LDP however this wasn't made available for review. The IESC was subsequently informed it was not finalised.

3.4.2 Exploration campaigns

No update in May 2024. The information provided in this section is the same as the information provided in the monitoring report prepared following the November 2023 site visit and is included only for reader convenience.

South of Cogon

CBG has obtained prospection LDPs and performed explorations in South of Cogon in the areas indicated as 'Blocks Test'.

North of Cogon

The IESC is aware of the ongoing exploration campaigns in the North of the Cogon River, for which LDPs has been delivered. Apart from plateaus 22 and 23, any other prospection will be covered by an ESIN (Environmental and Social Impact Notice).

CBG also initiated exploration for the North of Cogon (NoCo) for several plateaus. For these plateaus, the LDP process (including inventory and compensation) and the environment and social impact notice process have started. A notification was sent to the Lenders.

The LDP will be delivered when the PAPs compensation is complete.

As reported previously by the IESC, no firm decision has been taken to mine the NoCo Concession Area. In the event CBG decides to seek international financing to mine NoCo, the impacts will be subject to a separate independent analysis; as such, NoCo activities are largely outside of the IESC's current scope and, at the request of the Lenders, the IESC has adopted a watching brief approach in respect to NoCo activities. In the interim, any activities undertaken in NoCo (for example exploratory drilling) will need to be subject to the IFC PS-aligned ESMS.

3.5 CAO Process

The Project is currently subject to a Compliance Advisor Ombudsman (CAO) case, following the filing of a complaint, submitted in February 2019, relating to IFC financing the Project. The complaint, raised by local community members from 13 villages located in the area of Sangarédi, was in relation to environmental and social concerns. The Complainants and CBG are currently engaged in a dispute resolution process.

The dispute resolution process is a confidential process that is separate to the IESC's role. Consequently, the IESC is not involved, however the IESC is aware the process is taking place and of the issues being discussed via minutes of meetings released in accordance with the terms of engagement agreed between involved parties. Consequently, this report makes reference to the CAO process.

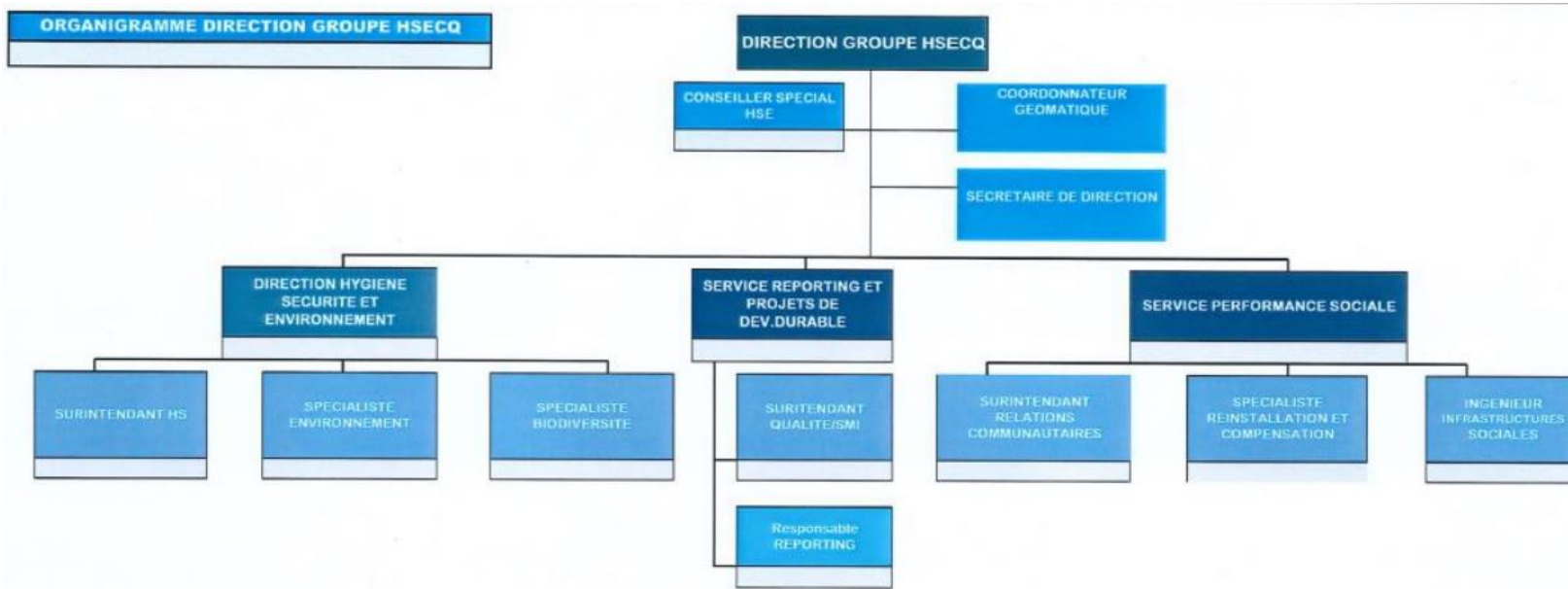
4. HSECQ RESOURCES STATUS

4.1 Overall HSECQ Organisational Structure

The health, safety, environmental and social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, fall within the remit of the CBG's Health, Safety, Environment, Communities and Quality (HSECQ) Department. The HSE&S matters are managed under the same E&S management system. In 2022, CBG's general management initiated a review of its strategy, and developed a 2025-2029 Strategy Plan, which is currently with CBG's board of directors for approval. This new Strategy Plan includes the reinforcement of CBG's environmental and social approach and led CBG to the restructuring of the HSECQ Department, with the following changes:

- The HSECQ Division was raised to the rank of a Group (i.e. has higher profile within the CBG organisation);
- The Reporting Service has been integrated to the HSECQ Group; and
- The reinforcement of the HSECQ reporting team.

Figure 4.1 shows the new HSECQ Group organisational structure (dated April 2024). The changes already made to the organisational structure demonstrate CBG's commitment to increase its environmental and social capacity, allowing them to better tackle environmental and social challenges.



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Figure 4.1: HSECQ Organigram

4.2 Senior HSECQ Positions

The IESC has reported the status of HSECQ resourcing in previous IESC monitoring reports. CBG's resourcing as of May 2024 (and since November 2023) is summarised below:

- CBG's General Director left in April 2024 and is yet to be replaced. Post site visit note: the General Director role was filled on the 30th May 2024;
- The HSECQ Director¹ role continues to be fulfilled by the Head of HSE Department (now the Acting HSECQ Director); ongoing support from a number of consultancies continues.

4.3 Environmental Reporting Team

As mentioned earlier, and since the last site visit (November 2023), the Reporting Service has been integrated to the HSECQ Department. The Environmental and Social Reporting team is composed of three members, and its responsibilities include (no change since the last site visit report):

- Coordinating the implementation of sustainable development projects;
- Supporting the promotion of the company's social and environmental responsibility; and
- Ensure reporting of our environmental and social obligations.

4.4 Environmental Monitoring Team

Since the last site visit (November 2023), no changes have been made to CBG's Environmental Monitoring Team.

4.5 Health and Safety Team

Earlier this year, CBG appointed a H&S Advisor to each operational division (mining, maintenance etc.).

The organisation of each of the H&S teams [within the HSECQ Department] remains the same as before, from bottom to top: advisors divided across Sangarédi and Kamsar, two H&S Coordinators (one in Sangarédi and one in Kamsar), a H&S Superintendent (reporting to the Acting HSECQ Director).

4.6 Biodiversity Team

At the time of the visit in May 2024, the composition of the Biodiversity Team remained the same, which is considered to be sufficient for its activities. The Biodiversity Team comprises the following seven positions:

- Biodiversity Manager;
- Botanical specialist;
- Faunal specialist;
- Rehabilitation specialist; and
- Inspection specialists (one lead and two juniors).

The Biodiversity Manager position is anticipated to be vacant from early June 2024, when the current Biodiversity Manager leaves the team. However, the IESC understands the current faunal specialist will be taking over the Biodiversity Manager role (an internal promotion). At the time of the site visit (May 2024), the IESC biodiversity specialist was told that the recruitment process for a replacement faunal specialist is coming to an end, and therefore a new faunal specialist should be in place as soon as possible over the coming months.

¹ HSECQ Director left his post in early 2021.

4.7 Community Relations (CR) Team

The new organisational structure has resulted in the creation of the Social Performance Department, which includes the Community Relations team, the Resettlement team and the social infrastructure monitoring engineer (working with the Resettlement and CR teams).

In April 2023, the Social Performance Department was composed of 23 people and CBG planned to increase the Department with four additional staff, to reach 27 team members in 2024. The IESC understands that all new personnel will be based in Sangarédi. In addition to CBG's direct personnel, the Social Performance Department is also composed of 3 additional subcontracted officers - 1 officer working for the CR team; 2 officers being part of the Resettlement team - all based in Sangarédi.

At the time of the site visit (May 2024), the CR team was composed of (no change from the last site visit):

- Community relations manager – Kamsar;
- Community relations superintendent – Kamsar;
- Community development coordinator – Kamsar;
- Community involvement coordinator – Kamsar;
- Community involvement coordinator – Sangarédi;
- 7 community relations and litigation advisors - two in Kamsar, five in Sangarédi;
- Community engagement administrative officer – Sangarédi.

The IESC understands that by the end of 2024, three CR advisors will be hired and based in Sangarédi. Specifically, CBG reported that recruitment was under finalisation for two advisors, including one woman, with the administrative process underway; and recruitment for the for 3rd advisor.

4.8 Resettlement team

The following positions in the Resettlement team were recruited over the past six months:

- One LRP Advisor;
- Two Local Development Officers, recruited within the communities of Hamdallaye and Fassaly Foutabhé and contracted through the temporary agency BICEIP for two years.

Another LRP Advisor, a female agronomist is at the final stage of contracting, and her contract was awaiting CBG General Director's signature.

With these recruitments, the Resettlement team now includes 10 people:

- Resettlement Specialist, leading the team under the supervision of the Social Performance Manager;
- Coordinator;
- Resettlement advisor;
- 2 LRP advisors;
- Compensation coordinator;
- 2 Compensation advisors;
- 2 Local Development Officers (through BICEIP).

In addition, the following contractors are supporting the CBG Resettlement Team on a regular basis:

- SAMEC: Support with inventories and surveys (contract ended in December 2023, one-year extension currently in the signature process);
- CEMED: Support with LRP development (contract up to August 2024);
- SIGMA: Support with the geo-referencing of data (contract ended in December 2023, one-year extension currently in the signature process);
- Phénix: Support with LRP implementation (contract up to July 2024 for MUOA, up to June 2025 for Thiapikouré and Kankalaré, up to October 2026 for Kagnaka); and
- Expertise Sud: Support with the implementation of the extended phase of Hamdallaye and Fassaly LRP (contract up to March 2027).

The resettlement consultant contract (through Acorn) has not been extended in 2024. At the time of the site visit (May 2024), the Social Performance Manager explained that the consultant may be called back to assist with the CAO mediation.

5. SIGNIFICANCE ASSESSMENT

5.1 Review findings

A summary of the review findings is presented in a significance table at the end of each PS section. For each finding, the following information is provided:

- The identification number for the finding;
- The aspect, which is an overall description of the finding, for example 'E&S impact assessment', 'organisational capacity', 'management of change', etc.;
- A description of the finding, for example deficiencies or omissions;
- IESC's recommendation to resolve/address the finding;
- The significance on a three-point scale (as defined in section 5.2);
- The status of the finding at the time of reporting.

Each finding is assigned an identification number, which is a unique code which reflects the month and year of the site visit during which the observation was made. At the start of the subsection of a given PS, a table with information on new and legacy findings, relevant to that specific subsection, is provided; where a subsection does not include relevant findings, no table is presented at the start of that subsection.

Legacy findings are closed when the actions performed by CBG have addressed the finding to a satisfying level. Where the description of a legacy finding necessitates an update, the legacy finding is replaced by a new finding. Such superseded findings are then documented in Appendix 2 of the report. If the finding's recommendation has been addressed in part, then the wording of the finding is amended to only reflect the part of the recommendation which remains to be addressed.

5.2 Assessment of significance

A ranking system is used to indicate the significance of each finding identified. In addition to highlighting the most important areas requiring improvement, the significance can also be used to aid the tracking and rectification of improvement measures.

Identified findings are categorised based on the following:

- Minor:** Minor non-compliance, risk or minor technical breach of Applicable Standards and commitments with no material, actual or likely potential environmental or social consequences, or significant human injury or harm;
- Moderate:** Moderate non-compliance or risk with actual or likely potential localised and short-term environmental or social consequences, minor human injury or harm or material short-term breach of Applicable Standards and commitments; and
- High:** Major non-compliance or risk with actual or likely potential spatially extensive and/or long-term environmental or social consequences, serious human injury/death or harm or material and extensive breach of Applicable Standards and commitments.

Time-critical issues measures can lead to a higher classification of significance. Conversely, high significance issues can be given a lower classification if measures are in place/in progress to address a concern.

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

6.1 HSECQ Resources

This section provides an update on HSECQ resources, including a discussion in relation to senior HSECQ positions and the CR and Resettlement team. This section also covers subcontractors and third parties, equipment resourcing and software, training, and procurement.

6.1.1 Senior HSECQ Positions

Performance Standard 1: Senior HSECQ Positions	
Associated open finding(s)	New: N/A Legacy: Nov 2023_HS_001

The IESC reiterates its finding on the fact that the HSECQ Director² role continues to be fulfilled by the Head of HSE Department (now the Acting HSECQ Director). This situation has been ongoing since the last HSECQ Director’s departure in early 2021 and needs to be resolved.

At the time of the site visit, CBG’s General Director had left (in April 2024) and hadn’t been replaced. This impacted multiple HSECQ tasks, among which, the signing of:

- Employment contracts, including the one for a new LRP advisor;
- Compensation reports and payments validation for 111 PAPs; and
- The signing of Purchase Orders (POs), including the one necessary for the selected consultant (SRK) to perform hydrological modelling at the Sangarédi mine site (as specified in the Water management Plan’s Action Plan dated 2018), and works to plant vetiver to slow down erosion.

Post site visit note: On the 3rd June 2024, CBG informed the IESC that an interim General Director had been in post since the 30th May 2024. Therefore, no new finding has been created in relation to this observation. Furthermore, a mechanism for the recruitment of a permanent HSECQ Director has been agreed with the Lenders ensuring efforts are in place to recruit for the post.

6.1.2 Community Relations (CR) team

The IESC considers the additional resourcing as a positive initiative; the additional resourcing exceeds expectations identified in the ESAP (i.e. 13 resources in May 2024 compared to 11 resources planned by 2023). The additional recruitment planned for 2024 will also result in five new people which demonstrate CBG’s attention to a regular resource need analysis for a more responsive management of social matters and community engagement.

As indicated in previous IESC monitoring reports, the Database Coordinator is now officially part of the Resettlement team, with no involvement with the IsoMetrix customisation project. Based on the discussions held on site, the IESC understands that the Database Coordinator will take a leading role in IsoMetrix development once IsoMetrix customisation process has been complete (see section below for further details in Section 6.1.4).

² HSECQ Director left his post in early 2021.

6.1.3 Subcontractors and third parties

CBG contracts many subconsultants, subcontractors and third parties to perform various tasks in relation to E&S topics. Since November 2023, such E&S tasks include (non-exhaustive list):

- The drain upgrade in Kamsar (see details in section 8.3.2);
- The investigations aiming to resolve the stream pollution in Fassaly Foutabhé (see details in section 8.3.4);
- The investigation on the burying scenario for the historical waste dump in Tora Bora (see details in section 8.4);
- Implementation of programmes, such as Malaria and HIV/AIDS programmes and community awareness campaigns on railway safety (see details in sections 9.1 and 9.3);
- Stakeholder engagement (see details in section 6.2);
- Income Generating Activities Programme implementation and consolidation, Très Petites Entreprise (TPE) Capacity strengthening and Local Content Plan (see section details in section 9.6.1);
- Capacity building of the CR team and other teams/departments (see details in section 4.7); and
- Land acquisition (surveys, database) and LRP preparation and implementation (see section 4.8).

CBG has also initiated discussions and/or the Purchase Order process with third parties or consultants on the following topics:

- System to reduce the sediment load at the 'Grand Canal' (see details in section 8.3.2);
- The management of some of CBG's waste (see details in section 8.4); and
- The hydro/groundwater balance model on the Sangarédi area (see details in section 8.3.4).

The involvement of external parties is essential for CBG to carry out some of the tasks outlined in the ESAP. However, the absence of a General Director since April 2024 has hindered their ability to enter into contracts, posing a risk to the successful completion of some ESAP actions (see Section 6.1.1).

6.1.4 Equipment resourcing and software

Performance Standard 1: Equipment resourcing and software	
Associated open finding(s)	New: N/A Legacy: Nov 2023_SO_001, Nov 2023_SO_002, Dec 2022_004

Based on discussions held on site, the IESC understands that the project led by the IT department to customise IsoMetrix for all E&S aspects (particularly for social and biodiversity), is still underway, despite the initial completion planned by the end of Q1-2024. Material shared for review provides information on the progress made on the data upload and visualisation, but only for activities carried out by the CR team, with reference to stakeholder engagement, grievances, and social initiatives. 14 team members can now access the IsoMetrix platform (test and production environments), with an increased number of users (11 in total) added from CBG's Social team in Sangarédi (Community Engagement Coordinator, the Database Coordinator, and CR Advisers). The users also include 1 user from the biodiversity team, and 2 administrators.

The material shared for review also provides information in relation to:

- A training session on social management data entry held on 8 May 2024, for new users from the Sangaredi CR team;
- The IFC Advisory Services³ is undertaking a diagnostic of IsoMetrix to optimise social data management;
- Difficulties encountered over the past months, namely issues with accessing new modules and functions (identified as a temporary issue); and the problem of accessing the internet in Sangaredi, which makes data entry difficult (described as a recurrent issue);
- Next steps, including data entry in IsoMetrix related to grievances, social initiatives and cultural heritage in Sangarédi; and customisation of social modules as requested by the Social team.

All that being considered, the IESC notes that IsoMetrix customisation project continues to report delays with no updated schedule provided to better understand the new planned completion date. The social team appears to be the only IsoMetrix user and no details have been provided on IsoMetrix customisation for the remaining aspects (e.g. environmental, biodiversity, health and safety). Therefore, previous findings remain open. In the next monitoring visit, the IESC will further investigate the root cause internet problems reported in Sangaredi.

From discussions held on site, two new vehicles were rented in April 2024, bringing the total number of vehicles at the disposal of the social team (Resettlement and CR) to seven. The IESC understands the vehicles used by the biodiversity team will be replaced soon.

6.1.5 Training

According to CBG, all trainings required in the environmental management plans are included in a roadmap and integrated into its KPIs.

Social Performance Department (CR + Resettlement)

Material shared for review and discussions held on site confirmed that all the training planned to be provided by the IFC Advisory Services has been rolled out and was completed in March 2024 – namely:

- Communication and development of communication tools;
- Complaints management mechanism;
- Community communication;
- Participatory monitoring and evaluation of projects;
- Gender training (community consultation and gender-based violence (GBV)); and
- Monitoring and evaluation (Independent Consultancy).

The following training sessions are planned for June 2024:

- Social management in mining regions, organised by the Centre of Social Excellence in Boké to be attended by one CR team member; and
- Land acquisition and resettlement, to be provided by the University of Groningen/World Bank/Intersocia, in The Netherlands in June 2024 and to be attended by one resettlement team member.

In addition, the following courses are going to take place between May and October 2024, targeting CBG's social team:

- Strategic community resettlement;

³ <https://www.ifc.org/en/what-we-do/products-and-services/advisory-services>

- Livelihood restoration;
- IFC Environmental and Social Performance Standards;
- Stakeholder engagement;
- Data collection and analysis tools Spatial and socio-economic data;
- Guiding Principles on Business and Human Rights (UNGPS); and
- Capacity building on the involvement of affected communities in air, water and noise monitoring.

The IESC appreciates that all planned training identified at the last site visit (November 2023) has been conducted and that an updated training programme targeting CBG social team has been provided for review responding to IESC’s previous recommendations in relation to training provision increasing awareness in CBG’s teams.

Environmental teams

CBG’s environmental team confirmed the training is up to date; the IESC requested the list of training performed since June 2023, however this was not provided. The IESC will renew its request at the next site visit.

Biodiversity teams

As part of the Biodiversity Action Plan, the biodiversity team continues to provide training to other CBG staff members on biodiversity aspects of the Expansion Project, particularly in relation to protection of biodiversity; this training is part of the HSECQ training curriculum.

6.1.6 Procurement

Performance Standard 1: Procurement	
Associated open finding(s)	New : N/A Legacy : Dec 2022_005

The IESC has previously identified a protracted procurement process as a key reason for the slow implementation of actions in the management plans, for example, when ordering new equipment/commissioning specialist consultant/external service providers. The slow procurement process is thought to have broad consequences across CBG’s operations, and it was therefore the IESC’s earlier recommendation that CBG undertakes a detailed review of CBG’s procurement procedures to identify bottlenecks and/or inefficiencies responsible for delaying the procurement of goods and services. The contracting process seems to be further slowed down by the current lack of General Director (see section 6.1.1)

Consequently, the IESC recommendation remains open and the IESC intends to maintain a watching brief during future monitoring visit to ensure procurements concerns do not recur in the future. CBG has recently informed that a debottlenecking exercise has commenced and will be subject to further review.

6.2 Integrated Management System (IMS)

CBG’s IMS has been developed and enriched over years to integrate the ISO requirements, the IFC performance standards (and other applicable standards as per described in section 1.1), and the Aluminium Stewardship Initiative (ASI) requirements. The HSECQ department is in charge of implementing the IMS throughout CBG’s operations. The IMS hasn’t notably changed since the last since visit (November 2023), and IESC’s observations are still applicable: the SharePoint platform used for the IMS’ documents repository is working and found to be used by most CBG employees.

To manage the numerous actions pertaining to each ESMP, CBG developed a roadmap, derived from each management plan, and appointed Sponsors/Champions (except for The Land Acquisition and Resettlement matters) responsible for the implementation of the roadmap’s actions.

6.3 Environmental and Social Management Plans and Action Plans

Performance Standard 1: Environmental and Social Management Plans and Action Plans	
Associated open finding(s)	New: May 2024_EN_002 Legacy: Nov 2023_EN_005, Nov 2023_EN_002

6.3.1 Roadmap progression

At the time of the site visit, the roadmap’s progression was reportedly 98 %, with, according to CBG, remaining actions pertaining to the Air Quality, Waste Management, Water Management, Rail and Road Management, and Influx Management Plans). January 2024 was the deadline specified in the ESAP (as amended in September 2021) for the completion of a series of E&S tasks, including the actions in the roadmap. As CBG did not complete all the actions specified in the ESAP prior to the January 2024 deadline, the ESAP is under Policy Lenders’ revision to incorporate new deadlines for the completion of the remaining items. Dates proposed for the completion of the roadmap actions are 31/12/24, except for the rehabilitation of Grand Canal for which the proposed date for completion is 31/12/25.

It is important to clarify that not all actions outlined in the Environmental and Social Action Plans (ESAPs) are featured in the roadmap. CBG distinguishes between 'operational' actions, which involve ongoing operational expenses, and 'initial compliance' actions, which are typically associated with capital expenditures. Only 'initial compliance' actions are reflected in the roadmap’s progression status. For instance, the rehabilitation of the 'Grand Canal' is categorised as an 'initial compliance' action and thus is included in the roadmap. Conversely, actions like the 'hydro/groundwater model recalibration' (detailed in section 8.3.4) are considered operational activities and are not included in the roadmap. Therefore, the roadmap does not provide a complete status on the fulfilment of all actions listed in the ESAPs.

Moreover, many ESMPs are dated late 2018/early 2019, and the progress on their Action Plans hasn’t been provided since then. Although the IESC recognises the significant improvements and advancements related to environmental and social topics in the past six years, considering the elements in this paragraph, the IESC lacks a clear understanding on the status of some 'operational' actions. CBG needs to provide an update on the status of all actions as part of the ESMPs review.

6.3.2 Environmental and Social Management Plans implementation

CBG manages its environmental and social impacts through the implementation of a suite of E&S management plans. Many of these were prepared in late 2018/early 2019 with a two-year review cycle envisaged.

The IESC has highlighted the need to review and update certain environmental management plans in previous site visit reports⁴. Whereas CBG recognises the need to revise its environmental management plans, it has delayed the review/update process preferring to tie any update to milestone events, such as completion of the roadmap (recognising the roadmap would likely inform any update of the management plans).

As mentioned above, January 2024 was the deadline specified in the ESAP (as amended in September 2021) for the completion of a series of E&S tasks, including the update of ESMPs. The

⁴ For example, Waste Management, Water Management, and Air Quality Management Plans

ESAP currently under Policy Lenders’ revision proposes new deadlines for the completion of the remaining items including the update of the ESMPs. Dates proposed for the updated of most ESMPs is 31/12/2024, and 31/07/24 for the AQMP. As the updated ESAP isn’t yet approved by the Lenders, the finding on this aspect remains, but its significance was lowered (from moderate to minor) as it is being addressed. The IESC will report on the management plans review timelines.

6.3.3 Management of Change (MoC)

As previously reported, the MoC Procedure was reviewed by the HSECQ Department in March 2022, leading to several recommendations for an updated MoC procedure. Since then, the procedure was reviewed to integrate the MoC from other departments and was undergoing internal approval at the time of the May 2024 site visit. Moreover, CBG has been testing the new procedure for the past year (from May 2023 to May 2024). Once approved, the updated procedure will be shared with the IESC and the Lenders for their approval, expected end of May 2024. *Post site visit note: In June 2024, the MoC procedure has not been shared.*

During the site visit, the IESC discussed progress of the MoC procedure with the MoC’s Champion. MoC contacts have been identified for each department affected by the procedure, namely: mine, port, HSECQ, innovation, technical and maintenance, Chemin de Fer de Boké (CFB), Kamsar plant, internal audit, fire fighting, legal, logistics, finance, HR and administration. CBG provided the latest version of the MoC register, which shows that from August 2023 to February 2024, the MoC was used six times by the CFB and finance/IT departments. Awareness campaign on the MoC procedure was provided to 240 people, and detailed training was provided to the MoC contacts in each department (around 40 people). Detail training of a duration of approximately eight hours was provided and included practical cases. The MoC Coordinator hasn’t been appointed yet.

As previously reported, CBG needs to finalise the MoC Action Plan, share the finalised procedure with the Lenders and the IESC, and roll out the measures therein as a matter of priority and ensure systems are put in place to make adherence to MoC mandatory.

6.4 Monitoring and Review

Associated open finding(s)	New : May 2024_EN_005 Legacy : N/A
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The primary function of the IESC is to assess the Project’s adherence to the relevant standards (or to identify any justifiable deviations), while exercising a duty of care towards the Project’s Lenders, therefore remaining independent of CBG. As an integral part of its role, the IESC conducts a thorough due diligence process, which includes biannual site inspections and examining all pertinent documents necessary for assessment, such as the ESMPs, the ESMS, the Stakeholder Engagement process documentation, etc.

CBG demonstrates a strong commitment to cooperation by supplying these documents as far as possible and facilitating the IESC’s site visits. Despite acknowledging the challenge in furnishing all necessary documents, the IESC identifies specific informational deficiencies that prevents the IESC from conclusively determining the Project’s compliance status on certain aspects.

An indicative list of the unavailable information includes:

- Incident related reports or information: Evidence of communication with local authorities on basin N°7 and information on the changes to the procedure following the drowning incident (details in section 9.4);
- Environmental data:

- Air quality (for more details refer to section 8.5.3): Stack monitoring reports (not shared since 2022), PM_{2.5} and PM_{total} data since November 2023, and 2023 Results for metals monitoring in ambient air;
- Water quality (for more information refer to section 8.3): All groundwater monitoring results, water quality results for mining effluents MIN204, , and nitrate concentrations results for industrial wastewater at CBG site in Sangarédi; and
- Other key documents were requested such as: The latest worker grievance register, an up-to-date map of the sedimentation basins in mined areas.

Monitoring reports are to be provided to the IESC for review as part of the documentation provided following each monitoring site visit.

6.5 Identification of Risks and Impacts - Plateau-by-plateau assessment approach

Associated open finding(s)	New : May 2024_RE_006 Legacy : March 2021_006
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During the preparation of the last IESC report, questions were raised about the E&S assessment process conducted for new plateaus. Feedback from communities indicated a potential oversight in the environmental and social impact assessment and a lack of formalisation of specific mitigation measures. Consequently, it was decided to conduct a review of the Land Disturbance Permit (LDP) process on-site with the HSECQ team (resettlement, community relations, HSE, and biodiversity) and the mine department.

The following points emerged from the discussion:

- The LDP process begins with an overview of the E&S constraints based on the ESIA. The ESIA baseline can be considered obsolete as it dates back to 2014. Therefore, additional studies (biodiversity) and community consultations are conducted.
- The LDP document is completed by each department and includes mitigation measures (e.g., an LRP or the inclusion of new monitoring sampling locations for the environmental team) and a final map of the land to be disturbed is produced.
- The LDP procedure indicates the closing of an LDP when the rehabilitation is complete, meaning a new LDP is necessary to re-open a rehabilitated plateau. However, discussions revealed different levels of understanding regarding the closing of an LDP. LDP closing should also be considered in conjunction with section 10.7, which addresses land return to the community, and section 11.6, which discusses land rehabilitation.

6.5.1 Mbouroré plateau LDP

The IESC requested the submission of all documents developed (LDP and associated consultations and studies) for the LDP of Mbouroré plateau (the last finalised LDP for an entire plateau). The objective was to assess compliance against PS1 of the E&S baseline and impact assessment made during the process.

The final LDP, dated March 2024, was provided. The assessment is divided into three components: biodiversity, physical environment, and community. An HSE notification is also included. Each section presents a summary of the main impacted receptors and standard mitigation measures. Annexes are said to provide a deeper analysis for each component but were not provided, nor was the supporting documentation (i.e., specific studies or consultation minutes).

The social impact assessment presents three sections:

- Demographic and infrastructure data of the impacted villages;
- Land survey data (total number of hectares impacted, divided by type of land, number of PAPs); and
- Identified cultural heritage.

The LDP concludes with a map showing the LDP boundaries and a one-page commitment from the Project sponsor summarising the mitigation measures allocated to them. The mitigation measures are generic, for example, 'build community bypass roads and develop a secured traffic plan for the community to access neighbouring villages and agriculture sites without major difficulty'; 'report any cultural heritage findings to the Community Relations team'; 'respect compensated area limit zones that must absolutely not be overtaken'; 'accelerate the implementation of livelihood restoration measures for PAPs'.

In the absence of the annexes and supporting documentation, it is difficult to assess the robustness of the E&S assessment. Cumulative impacts (of other plateaus and other operators) are not presented, and the extent of the socio-economic survey conducted on the impacted communities and PAPs is unknown, as the associated LRP has not been finalised at this stage. It is also not possible to assess the extent to which the impacts and associated mitigation measures for the plateau have been disclosed and validated by the impacted communities.

6.6 Stakeholder engagement

Performance Standard 1: Implementation of the stakeholder actions	
Associated open finding(s)	New: May 2024_SO_001, May 2024_SO_005, May 2024_SO_006 Legacy: June 2023_003, Dec 2022_010, Dec 2022_013

A dedicated discussion on the progress with the implementation of the Stakeholder Engagement did not take place during the site visit, however this section summarises relevant updates based on the documentation shared for review and community engagement conducted by the IESC when on site.

6.6.1 Stakeholder Engagement Plan (SEP) status

As reported in our last monitoring report, the SEP 2022-2025 has been approved by the Lenders and a summary of the 2022-2025 SEP is now available on CBG’s website⁵. According to the material shared for review, the SEP disclosure at the level of local administrations and communities started in December 2023 and is still ongoing.

The status of the SEP action plan reports an overall 89% implementation progress (against a target of 95%), compared with 86% recorded in November 2023. According to CBG, this is mainly due to the delayed decisions around the North of Cogon access infrastructure. According to CBG, once the alternative for the infrastructure is selected, stakeholders will be identified and engaged. Deadline for such engagement is reported to be 30 June 2024.

Based on the data reported via the material shared for review, the number of people engaged through the SEP implementation in 2024 (until end of April) totalled 3,259 (66% at the mine, 28% along the railway, and 6% at the port). Such percentages show an increased engagement at the rail and port compared to the engagement undertaken in 2023.

6.6.2 Participatory environmental monitoring

Following discussions held onsite and engagement with the community of Horè Laafou during the site visit, the IESC confirmed the participatory environmental monitoring has started with training

⁵ Disclosure of the 2022-2025 SEP can be found here: <http://cbg-guinee.com/les-communautes-locales/>

provided to community representatives who are part of the environmental monitoring committees, in line with the participatory environmental monitoring procedure previously shared for review⁶. The community of Horè Laafou confirmed engagement and involvement in both the environmental equipment monitoring (with communities representatives attending monitoring activities) and in the participatory environmental monitoring which is considered positive by the IESC.

Based on the discussions held onsite, the IESC understood that participatory environmental monitoring started through a pilot project involving 18 communities, six in Kamsar and 12 in Sangarédi. The pilot project started with the communication of the Q4 2023 and Q1 2024 environmental monitoring, which was performed with the participation of the communities' representatives (as part of the monitoring committees). Based on the feedback from the pilot project, CBG plans to fine tune the participatory environmental monitoring procedure before launching the process to all communities included in the engagement programme, and aim to share the environmental results (with water, air and noise monitoring data) with the communities every three months.

Launch through community meetings are planned to start end of May 2024 (date also confirmed by the community of Horè Laafou). The IESC appreciates the overall process and CBG's attention to details and to ensure successful disclosures and constructive dialogues. Nonetheless, the IESC continues to note delays in the implementation of the participatory environmental monitoring and recommends that CBG ensures to continue efforts on this topic to promptly launch the process to all communities in the engagement programme.

6.6.3 Other stakeholder engagements

The IESC continues to confirm that the SEP has been implemented with ongoing engagement organised and carried out regularly by CBG's CR team. Based on the information presented by CBG (Figure 6.1), most of the engagement activities took place at the mine (117 meetings, 67 %), followed by the port (15 meetings, 9 %), and then along the railway (43 meetings, 24 %). When reviewing the information in relation to the type of activity, the majority of the meetings have taken place on CBG's operations (112 meetings, 64 %), followed by resettlement (37 meetings, 21 %), and finally on the Multi-User Project (26 meetings, 15 %). In 2024 (up to April 2024), engagement took place with 93 communities: 69 at the mine, 14 along the railway and 10 at the port.

⁶ From the November 2023 monitoring report "Based on the material shared for review, 18 environmental monitoring committees have been established, with 12 in the mine area and 6 at the port and along the railway. Community representatives have been identified, including women in the area of Sangarédi, though the procedure does not explicitly indicate presence of women among the selection criteria; 2 inductions have been organized targeting community representatives to explain the overall participatory environmental monitoring process between July and August 2023 in Sangarédi, and in September 2023 in the area of Kamsar, Kolaboui and Boké. Another meeting on the participatory monitoring and on a more dedicated inductions on monitoring equipment has been held in November 2023 in N'Dangara targeting the 12 villages in the SoC concession. Based on the minute of meeting shared for review, the IESC observes that some concerns have been expressed by the participants on the mitigation measures to be applied in case of exceedances, and on the overall restitution strategy, and reception of copies of the monitoring results. The actual monitoring campaign was planned to start in December 2023. The IESC will monitor progress in the next monitoring visit."

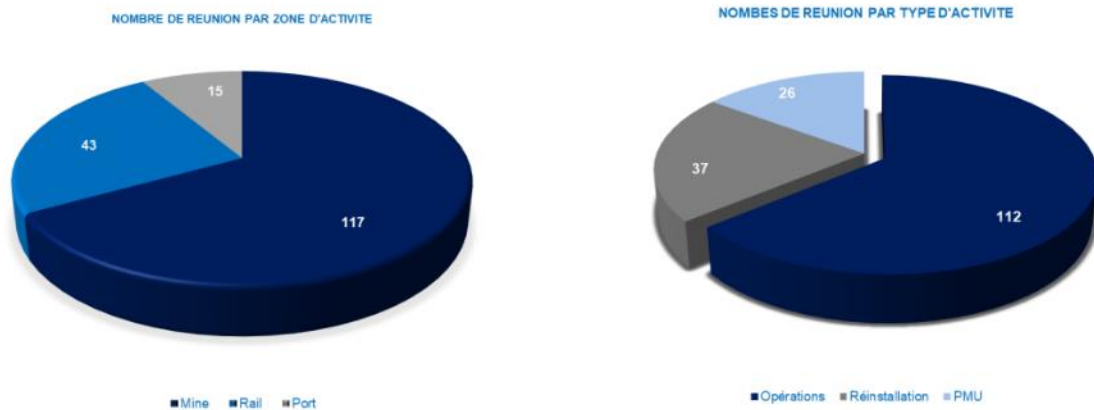


Figure 6.1: Meetings by area of activity (mine, railway, port) and type of activity (operations, resettlement, Multi-User Project) as of 30 April 2024

Since December 2023, CBG minutes of meetings (especially at the mine) are signed. Based on the material shared for review, the IESC understands that the main concerns expressed by communities remain the same as previously reported; the exception to this is at the port, where engaged communities have expressed requests for financial assistance. The list of concerns expressed, per area of activity, are as follow:

- Mine: Employment of local labour; Capacity building for young people; Reprofilling of community access roads; Improved access to drinking water (borehole); Construction/renovation of infrastructure (schools, health centres, etc.); Livestock accidents; Improvement of electricity supply.
- Railway: Improved access to drinking water (borehole); Request for installation of wire fencing in certain villages along the railway; Community access roads; Employment of local labour.
- Port: Demand for basic social infrastructure; Community access roads; Access to financial assistance.

Meet-ups with communities during the IESC site visit confirmed CBG's regular engagement and follow-ups.

Through the discussions with the community of Horè Laafou, the IESC can confirm that requests of local employment are one of the raised concerns which require dedicated follow-up, particularly the ones in relation to communities' grievances related to non-local workers appointed as security guards in nearby security posts. The IESC suggests that CBG further monitors workers' origins and clarifies with communities the implementation of CBG's criteria as part of the local recruitment process – which the IESC understands is not necessarily directly associated with the closest communities and may also be influence by workers' previous experience.

For example, during the site visit, the IESC visited the Kassane Community located in the area of the port. Kassane Community representatives confirmed that CBG engagement occurs yearly, however they raised they have reported impacts on livelihood (decrease of fishing activities) for several years, complained about the presence of noise and dust (particularly at night and potentially caused by the close presence of GAC), and requested assistance to improve their agricultural activities, particularly associated with palm oil production.

Whilst the IESC recommends that the ESIA is reviewed to verify whether all mitigation measures and monitoring actions applicable to the islands are being implemented, CBG should further verify the community's concerns (through environmental monitoring for dust and noise) and provide support to the community through more regular engagements than on a yearly basis.

On the basis of the consultations mentioned, the IESC undertook a high-level review of the ESIA mitigation measures, and it was not possible to acknowledge which of the measures related to communities' islands are being implemented.

The IESC noted that some complaints recorded by CBG are likely related to other mining companies' operations (also refer to Section 7.7.1 for some details on the fatality occurred by the railway managed by Compagnie de Bauxites et d'Alumine de Dian Dian (COBAD)). For instance, the community of Horé Laafou also indicated livelihood impacts (less fishing, reduced production of palm oil and cashew) likely due to the proximity of COBAD activities. The IESC understood that discussions over corrective actions have taken place between the community of Horé Laafou and COBAD, although compensation measures were not discussed.

Moreover, the IESC notes that some complaints raised by the engaged communities relate to cumulative impacts caused by the increasing number of mining companies operating in the same area. Whilst the IESC acknowledges CBG's engagement effort and management of E&S aspects directly linked to their own activities, the IESC encourages CBG to initiate a constructive discussion with other mining companies on the cumulative impacts of mining operations. The risk of an increase in the number of communities' complaints in relation to cumulative impacts as a result of other mining companies operating in the area could result in a reputational risk to CBG, irrespective of its actual responsibility.

Finally, based on discussions held on site and material shared for review, the IESC understood CBG has identified the local company who will be responsible for providing logistics for the organisation of the consultation forums in the communities of Kamsar, Kolaboui, Boke, Tanene, Sangaredi e Daramagnak; as previously reported, no consultation forums ('cadre de concertation') was organised in 2023⁷. The related Purchase Order for the consultation forums was approved in March 2024. The IESC will follow up on the planning of consultation forums at the next monitoring visit.

6.7 Grievance Management

6.7.1 Updated Grievance Management Procedure

Associated open finding(s)	New: N/A Legacy: Dec 2022_017
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The final Grievance Management Procedure was finalised in February 2024, to include amendments discussed at the last CAO session, and to include a comprehensive list of KPIs relevant to grievance management. However, the IESC notes that the Grievance Management Procedure shared for review lacks coherence with the SEP in terms of KPIs. The IESC will follow up on the update of the KPIs in the Grievance Management Procedure and the monitoring of these at the next monitoring visit.

⁷From the December 2022 Monitoring report, "Since February 2022, CBG has started meetings with consultation forums (cadre de concertation) mainly including institutional stakeholders, Non-Governmental Organizations (NGOs), technical experts and communities "with a view to involving the various stakeholders in peacekeeping solutions between the neighbouring communities and the company", and share and discuss Project updates. To date, 6 consultations forums have been organized across CBG's operational sites; the IESC also understands that these open consultation forums – as organized by CBG - constitute a space for presenting CBG's activities and discussing complex issues, collecting and discussing participants' concerns. In addition, the IESC understand that such consultation forums have been positively welcomed by all participants, including local and administrative authorities, Civil society organisations (NGOs, women's and youth associations and others), and communities, with a general request to make such forum a permanent consultation channel."

6.7.2 Grievance Management Status

Performance Standard 1: Grievance Management Status	
Associated open finding(s)	New: N/A Legacy: Nov 2023_SO_003, Dec 2022_016

An updated community grievance register has been shared for review, listing all the complaints recorded in 2023 and 2024. Following IESC’s earlier recommendations, the community grievance register has been updated to show progress of complaints management (column ‘Actions taken’), closure date, number of days to close the grievance since its recording within the register, and any additional comment. Nonetheless, it is still recommended to differentiate the CBG direct management grievances from the CAO mediation related grievances in the register.

Based on the last material shared for review, from January to December 2023, CBG registered 128 grievances, including 90 that have been closed and 29 that are currently being processed. Of the total grievances received, 78 % came from the mine area, 19% from the rail area and 3 % from the port area. As per the E&S Performance Annual Monitoring Report 2023, 61 % are related with resettlement/land occupation, 9 % with environment, 16% with safety and 16 % in relation to socio-economic aspects. As per the Q4 2023 Borrower E&S Certificate, CBG was able to close five out of the 30 grievances registered in the fourth quarter of 2023. 19 out of 30 grievances are related to resettlement, two grievances to environment topics, seven are related to safety and two refer to socio-economic aspects. Through the review of the Q4 2023 grievance register, the IESC notes the use of a different register which does not contain details on dates grievances were raised, and does not provide information on the topic each grievance related to (e.g. resettlement, environment, socio-economic); however, additional material provided for review provided missing information in relation to the status of grievances raised between 2021 and 2023.

Figure 6.2 provides information on the status (received, currently being addressed, closed) of grievances received between 2020 and 2023. The two charts represent information shared with the IESC in November 2023 (left) and in March 2024 (right).

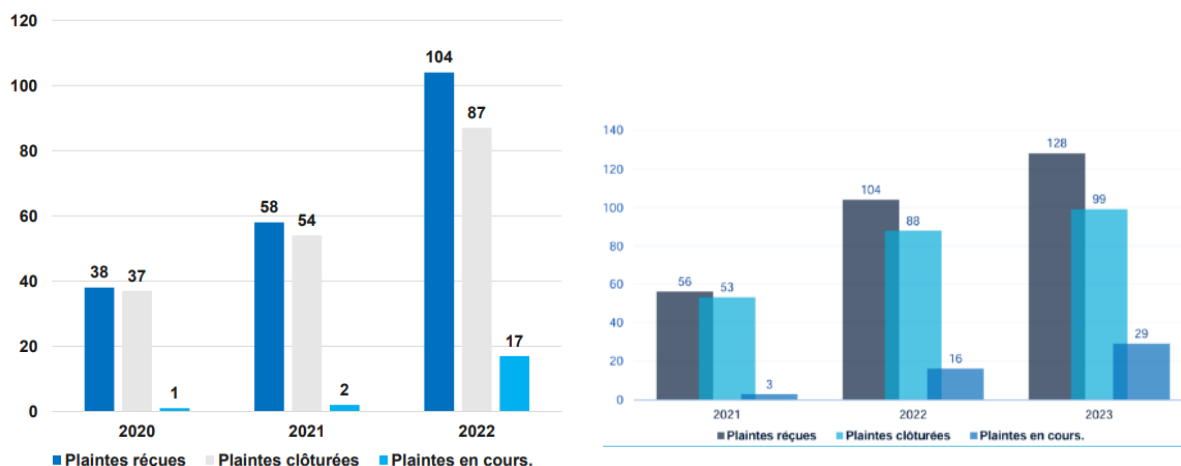


Figure 6.2: Grievance status raised from 2020 to 2022, comparison between data shared with the IESC in November 2023 (on the left) and May 2024 (on the right).

(plaintes reçues: received complaints, plaintes clôturées: closed complaints, plaints en cours: complaints currently being addressed)

The IESC understands that the majority of the grievances are related to resettlement and compensation issues. No details are provided to understand which open grievances are managed under the CAO mediation. The Q4 2023 Borrower E&S Certificate reports that

one grievance from 2022 was closed in the fourth quarter of 2023 and the Q1 2024 Borrower E&S Certificate reports that 18 grievances from 2023 were closed in the first quarter of 2024. However, considering that the last material shared for review does not include the status of the grievances raised in 2020, the number of open, being addressed, or closed 2020's grievances is unclear. CBG reported in the last material shared for review that the HSECQ committee has been looking into the grievances received and are discussing these, which is a positive progress considering previous IESC recommendations to give priority to managing and monitoring progress of all past grievances and to use appropriate KPIs to assess improvements in CBG's grievance management. Moreover, the grievance mechanism had been reviewed since the last site visit and action plans are developed for complex grievances. Overall, even though some grievances from 2020, 2021, 2022 and 2023 are still open and the status of 2020's grievances is unclear, it is understood that CBG is taking action in addressing and closing the pending grievances. A dedicated session on grievances will be required by the IESC during the next monitoring visit to further clarify progress status and reasons for delays.

As of the grievances open since the start of 2024, CBG was able to close 11 out of the 33 grievances registered in the first quarter of 2024. (Figure 6.3). 19 out of 33 grievances received are related to resettlement, six grievances made in relation to environment, four are related to safety, and four refer to socio-economic aspects (see Figure below).

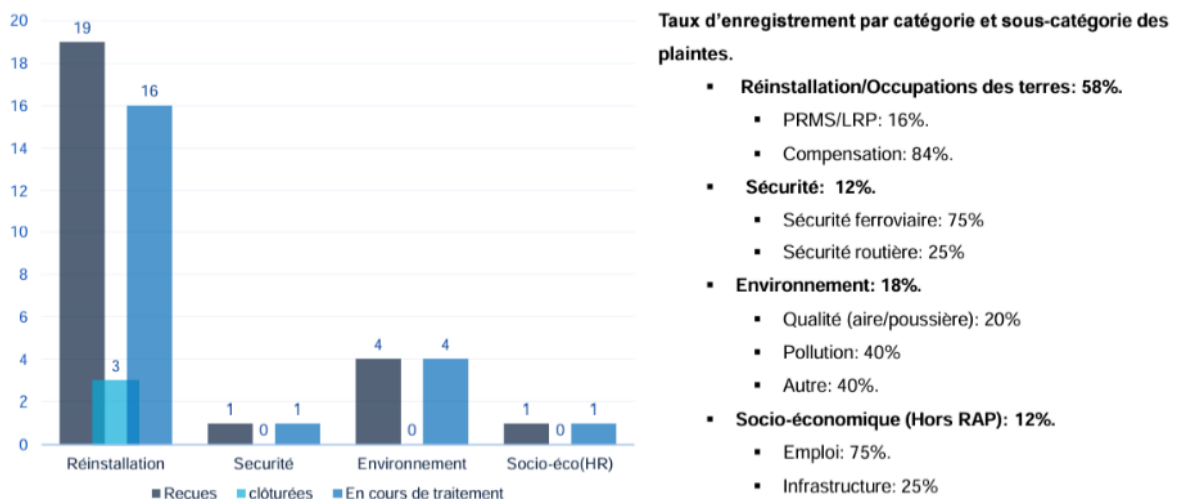


Figure 6.3: [Date] 2024 Grievance status by category

Apart from the resettlement related grievances (discussed in Section 10.6), CBG's risk analysis of the 2024 grievances identified the following:

- Environment (water pollution): Fewer complaints, but impact concerns several villages including Fassaly Foutabhè, Fassaly Bèlèndèrè (communities bordering the city). On this matter CBG recognises the high-reputational risk and proposes the installation of settling basins to retain sediments, a new UV unit for optimal wastewater treatment and appoint a consultant to study the pollution of the Fassaliwol watercourse.
- Safety (Blasting and Rail): There are fewer blasting related grievances due to improved process (see section 8.6). Accidents involving livestock on the railway remain a major concern for communities, with CBG considering mitigation measures including betafence installation for villages with high potential accident risks for livestock, establishment of surveillance posts at community road intersections with mining roads, installation of traffic signs along the roads; raising community awareness on road and rail safety during PEPP meetings.

- Socio-economic (excluding RAP): Lower number of grievances. In 2024 these are mainly related to employment issues, with CBG considering mitigation measures including training for young people on operating mining machines and provide more jobs to local communities.

The IESC’s review of the Q1 2024 grievances and community requests register, identifies the same findings as the ones identified through CBG’s risk analysis. However, in addition to these, the IESC notes the following:

- Grievances have been raised in relation to workers employed at the mine and identified by the communities as non local. The IESC and recommends that in addition to what has already been proposed by CBG, follow-ups with communities and clarifications on the selection of local workers are organised.
- Some grievances related to livestock accidents continue to be recorded, with CBG rejecting any compensation requests due to the existing provisions of the Pastoral Code. The IESC did not have the chance to discuss this matter during the May 2024 site visit; however, and for completeness, the IESC will request CBG’s clarification on the specific provisions of the Pastoral Code which apply to these cases during the next site visit (also refer to Section 9.3).

As previously said, the grievance register appears to be more systematically updated and the IESC confirms it contains more detailed information to understand the progress made with grievance management. On the other hand, the need to reduce the timing for grievance closure remains a valid recommendation.

Based on the material shared for review, CBG has observed an increasing number of women submitting complaints (9.5 % in 2023) compared to available 2022 data (4.8 %) and 2021 (3.6 %). Organisation of focus groups discussions were given by CBG as one of the reasons for such increase in reporting. However, during the first quarter of 2024, two out of 30 grievances were sent by women (6 %). CBG reported that the lower number of grievances in 2024 can be explained by the fact that women's concerns were considered during the LRP enrollment process. The IESC will follow up on this last topic in the next site visit.

Overall, CBG continues to organise community meetings to raise awareness around the community grievance mechanism.

6.7.3 Community Requests for Assistance (*Doléances*)⁸

Performance Standard 1: Community Requests for Assistance (<i>Doléances</i>)	
Associated open finding(s)	New: May 2024_SO_007 Legacy: N/A

During the May 2024 monitoring visit, the topic of the open *doléances* was not discussed. The IESC will follow up on this topic in the next monitoring visit. However, the information in this section is from the documentation shared for review following the site visit.

As per the material shared for review, CBG received 46 *doléances* in 2021, including 43 that have been closed, one remains open, and two became grievances. In 2022, 57 *doléances* were received, including 53 closed and four are currently being addressed.

⁸ The difference between grievance and *doléance* is as follow: A grievance stems from an impact due to the operations of CBG or its subcontractors or arising from activities related to resettlement. A community complaint (or *doléance*) is a concern or a request for assistance expressed by the communities.

According to the Q4 2023 Certificate, in total, from January to December 2023, CBG registered 94 community assistance requests, including 48 that have been closed, 45 that are currently being processed and one became a grievance. The document also identifies that CBG received 10 community assistance requests in Q4 2023, of which three were closed during that period.

According to the Q1 2024 Certificate, from January to March 2024 CBG registered 35 community assistance requests, of which 25 were from the mine area and 10 from the rail and port areas. 15 requests out of the total have been closed and 20 are currently being processed. However, based on the material shared by CBG, 25 *doléances* have been received during 2024, of which 38 % of requests are related to basic social infrastructures (opening and maintenance of community roads and renovation of places of worship). 38 % out of the total requests are related to others (rail safety, Income Generating Activities Programmes (PRAMS) or AGR, local employment, compensation and training). 18 % of requests are related to services (electricity, water, fire brigade and sanitation) and 6 % of requests are related to financial and material support (purchase of furniture and equipment, financing of events). In addition, according to the Q1 2024 Borrower Certificate, two requests from 2023 were closed during the Q1 2024.

As reported in the last monitoring report (November 2023), CBG is yet to share, with the IESC, the community request for assistance (*doléances*) management procedure established and disseminated to communities through focus groups.

6.8 PS1 Open Findings

6.8.1 PS1 High significance findings

Table 6-1: Summary of open high significance findings, PS1

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_RE_006	E&S impact assessment	Community feedback raises the question of potential missing step in the LDP process. A review of the process was done during the May site visit but the IESC could not review the entire Mbourore LDP documentation to assess the E&S impact assessment undertaken.	Provide the Mbourore LDP annexes and E&S documentation supporting the LDP to allow the IESC and Lenders to assess the compliance of the process with PS1 requirements.	High	Open (new)
Dec 2022_013	Stakeholder Engagement	While disclosure of environmental monitoring methodology occurs, CBG has not started disclosing environmental monitoring results to communities.	Disclosure of Environmental monitoring results to be organised as a priority.	High	Open. The finding remains open as the IESC continue to note delays in the implementation of the environmental disclosure procedure to all communities in the engagement programme.

The 'closed' legacy findings from previous IESC monitoring visits are provided in [Appendix 2](#) of this report.

6.8.2 PS1 Moderate significance findings

Table 6-2 Summary of open moderate significance Findings, PS1

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Nov 2023_HS_001	Organisational capacity and competence - staff resources	HSECQ Director is still in vacant position. The current Acting HSECQ Director is the head of HSE department.	CBG to clarify its position and agree on a timebound plan to appoint full-time HSECQ Director with the Policy Lenders to resolve this issue.	Moderate (reduced from High because there is a clear commitment from CBG to recruit and formal a reporting mechanism agreed with Lenders)	Open
Nov 2023_EN_002	Management of Change	The current MoC procedure	CBG should continue to finalise the MoC Action Plan and roll out the measures therein as a matter of priority. Systems should be put in place to make adherence to management of change mandatory. For example, purchases could be blocked unless evidence is provided that change management was considered as part of any Purchase Order approval.	Moderate	Open Finding will be closed once the MoC Action Plan is finalised.
May 2024_EN_005	Monitoring and Review	CBG demonstrates a strong commitment to cooperation by supplying these documents as far as possible and facilitating the IESC's site visits. However, the IESC highlight certain gaps in	It is crucial that CBG provides all collected monitoring environmental data as per stated in the Environmental Monitoring Plan (EMoP). The IESC requests that CBG provides the necessary information to the extent possible, which will help resolve or refine the outstanding findings associated with the missing data.	Moderate	Open

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		<p>information, which consequently prevents the IESC from conclusively determining the Project’s compliance status on certain aspects.</p>			
<p>Nov 2023_SO_002</p>	<p>Organisational capacity and competence - equipment resourcing</p>	<p>IESC confirmed presence of delays resulting from procurement of goods and services, with specific discussions held over the request of 2 additional vehicles for the CR team, which was made two years ago and has not yet been satisfied. In addition, at the time of the November 2023 monitoring visit, several vehicles were at the garage, sometimes for a long and/or repetitive time, which following discussions with different E&S teams indicated an overall degradation of the vehicles’ conditions.</p>	<p>The IESC recommends that CBG undertakes a supporting resource need analysis, in terms of e.g new vehicles, office spaces, considering the increased of the whole E&S team size.</p>	<p>Moderate</p>	<p>Open Even though it is understood that equipment has been increased, such as vehicles, a resource need analysis is still needed to close this finding.</p>

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Nov 2023_SO_003	Grievance Management	The grievance register informs that out of 58 closed grievances in 2023, 31 have taken more than 50 days to close- i.e. longer than timeframe specified in the Grievance Management procedure. 24 grievances have been closed after 90 days.	CBG to expedite resolution of grievances to align with the timeframes specified in the Project Grievance Management Procedure.	Moderate	Open. The IESC acknowledges the action taken by CBG to resolve the issue but awaits results and closure of old grievances.
June 2023_003	Stakeholder Engagement_Gender Issues	Poor gender awareness as evidenced by a grievance/lack of training to date.	CBG to work on a structured plan to raise awareness on gender issues within CBG and among contractors, through: <ul style="list-style-type: none"> • Continuing awareness raising events, also considering AJDEF's recommendations; • The involvement of CBG and Contractors' male workforce in raising awareness initiatives 	Moderate	Open. Although it is noted a IFC training was implemented in this regard, recommended actions are still valid. Finding will be closed once the recommendations will be initiated.
Dec 2022_004	Organisational capacity and competence - equipment resourcing	IsoMetrix full implementation has further delays recorded compared to the last IESC site visit.	Regular use of IsoMetrix to start as a matter of priority.	Moderate	Open. IsoMetrix customisation and use is still delayed.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Dec 2022_005	Organisational capacity and competence - equipment resourcing	CBG has experience long delays CBG in purchasing and receiving the required equipment.	CBG to regularly plan new equipment in combination with the use of the Sponsor / Champion approach in case of delays. Planning should include conservative timelines that consider past procurement delays. Also Ref. Oct 2021_008	Moderate	Open Although CBG has informed the IESC that a debottlenecking exercise has commenced and will be subject to further review.
Dec 2022_016	Community Grievance Mechanism	Current version of the grievance register does not keep track of how much time it takes to close grievance so to monitor deviation from the timeframe proposed in the grievance mechanism procedure (50 days). The grievance register should also keep track of all grievances which are now managed through the CAO mediation.	The Grievance register to keep track of grievances under CAO mediation.	Moderate	Open. Grievances under CAO mediation needs to be better identified.
March 2021_006	NoCo Exploration	The exploration campaign affects a relatively large area and application of the LDP process to each annual drilling campaign means that the cumulative impact of the three drilling campaigns in all three plateaus over a three-year	Undertake a rapid cumulative E&S assessment of the exploration campaign, as if it were a single project, prior to the first E&S rapid impact appraisal. This cumulative assessment to focus on identifying and evaluating the key risks/mitigation measures to inform the individual LDP-level E&S rapid impact appraisals.	Moderate	Open Details of the studies to be undertaken for NoCo feasibility study have to be shared with the IESC.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		period is not factor in drilling campaign decision-making for each LDP.			

The 'closed' legacy findings from previous IESC monitoring visits are provided in [Appendix 2](#) of this report.

6.8.3 PS1 Minor significance findings

Table 6-3 Summary of open minor significance Findings, PS1

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_EN_002	Environmental and Social Management Plans and Action Plans	Not all actions outlined in the Environmental and Social Action Plans (ESAPs) are featured in the roadmap. Therefore, the roadmap does not provide a complete status on the fulfilment of all actions listed in the ESAPs. Moreover, many ESMPs are dated late 2018/early 2019, and the progress on their Action Plans hasn't been provided since then. Although the IESC recognises the significant improvements and advancements related to environmental and social topics in the past 6 years, the IESC lacks a clear understanding on the status of some 'operational' actions.	CBG will need to furnish an update on the status of all actions as part of the ESMPs review.	Minor	Open (new). This finding is currently 'Minor' as the ESAP currently under Policy Lenders' revision proposes new deadlines for the update of the ESMPs (31/12/2024 for most ESMPs and 30/09/24 for the AQMP). This finding would increase in significance if the ESMPs aren't updated as planned.
May 2024_SO_001	Stakeholder Engagement and Grievance Management	Through the engagement with the community of Horè Laafou, the IESC confirms that requests of local employment are one of the raised concerns which requires dedicated follow-up, particularly considering communities' grievances related to non-local workers appointed as security guards in nearby security posts.	CBG further monitor workers' origins particularly at the mine and clarify with communities CBG's criteria applied to local origins in the local recruitment process.	Minor	Open (new) This finding is currently Minor as the IESC understands this is not necessarily directly associated with the closest communities and may also be influenced by workers' previous experience.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_SO_005	Stakeholder Engagement and Grievance Management	Following consultations with Kassane community the IESC did not understand which of the measures related with island's communities have been implemented to date.	CBG to verify any mitigation measures relative to island's communities present in the ESIA and provide evidence of implementation and monitoring of such measures. If monitoring has not been implemented, a justification of exclusion of such measures needs to be provided. Otherwise, a new plan for implementation and monitoring of the identified measures is required.	Minor	Open (new)
May 2024_SO_006	Stakeholder Engagement and Grievance Management	Following the site visit, the IESC notes that some complaints raised by the engaged communities relate to cumulative impacts caused by the increasing number of mining companies operating in the same area.	Whilst the IESC acknowledges CBG's engagement effort and management of E&S aspects directly linked to their own activities, the IESC encourages CBG to initiate a constructive discussion with other mining companies on the cumulative impacts of mining operations. Indeed, the risk of increasing communities' complaints and tensions related to the cumulative presence of mining operations can have repercussions on CBG directly, irrespective of its actual responsibility.	Minor	Open (new)
May 2024_SO_007	Stakeholder Engagement and Grievance Management	As already reported in the last monitoring report (November 2023), the IESC still awaits the community request for assistance (doléances) management procedure that CBG has established and disseminated to communities through Focus groups.	CBG to provide community request for assistance (<i>doléances</i>) management procedure.	Minor	Open (New)

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Nov 2023_SO_001	Support in customary practices	Observations made onsite have shown that the community engagement and the Social team's adherence to customary practices such as petty cash, which are currently managed by each Social team member individually on their own money.	Based on observations made onsite, the IESC also recommends that CBG ensure possibilities for the Social team to access to petty cash to better support community engagement and the Social team's adherence to customary practices. Possibilities to access to petty cash should be regulated through the implementation of a fast-track procedure that, if not already in place, should be developed in line with CBG policies and relevant internal procedures.	Minor	Open. The IESC understands that CBG acknowledges the issue, although a solution has not been found yet. This item remains open.
Nov 2023_EN_005	Environmental Management Plans	Certain Environmental Management Plans have not been updated since January 2019, in part because updates were being linked to outcomes from the implementation of the roadmap/development of the integrated Management System. This finding has been made before (first in December 2022) and is repeated to emphasize an increasing urgency to update the EMPs.	Undertake a structured review of current EMPs (and other plans including cultural heritage and security plans) and update accordingly, keeping the IESC/Lenders informed in accordance with the MoC procedure. As CBG mining activities grow on other plateaus, it is crucial the plans are adjusted to include new measurement locations.	Minor	Open. As the updated ESAP isn't yet approved by the Lenders, the finding on this aspect remains, but its significance was lowered as it is being addressed through the ongoing revised ESAP discussions.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Dec 2022_010	Stakeholder Engagement_Gender Issues	Poor gender awareness as evidenced by a grievance/lack of training to date.	<p>CBG to work on a structured plan to raise awareness on gender issues within CBG and among contractors, through:</p> <ul style="list-style-type: none"> Continuing awareness raising events, also considering AJDEF's recommendations; <p>The involvement of CBG and Contractors' male workforce in raising awareness initiatives</p>	Moderate	<p>Open.</p> <p>Although it is noted a IFC training was implemented in this regard, recommended actions are still valid. Finding will be closed once the recommendations will be initiated.</p>
Dec 2022_017	Community Grievance Mechanism	Grievance management related KPIs can be found in the updated (yet to be finalised) SEP and in the Grievance Management Procedure.	CBG to ensure that all grievance management related KPIs are applied and monitored.	Minor	<p>Open.</p> <p>While the Grievance Management Procedure was finalised in February 2024, the IESC notes the Grievance Management Procedure KPIs are not consistent with the KPIs presented in the SEP.</p>

The 'closed' legacy findings from previous IESC monitoring visits are provided in [Appendix 2](#) of this report.

7. PERFORMANCE STANDARD 2: LABOUR AND WORKING CONDITIONS

7.1 Introduction

This May 2024 site visit report focuses on the following topics pertaining to labour and working conditions:

- Labour and working conditions (including Workers' Grievance Mechanism);
- Occupational Health and Safety performance.
- New Accommodation for workers (social housing);
- Contractor & supplier management;

Key findings are presented on each of these topics below.

7.2 Labour and working conditions (general observations)

Associated open finding(s)	New: May 2024_SO_002 Legacy: Nov_2023_SO_004
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During the May 2024 monitoring visit, the IESC held a dedicated session with CBG's HR Manager and the Contractor Manager in Kamsar, to discuss labour and working conditions, worker grievance mechanism, the new project related to social housing for CBG's workers, and the implementation of the Contractor & Supplier Management Plan.

At the time of the site visit, CBG's HR Manager reported the following figures related to CBG's Direct workers:

Job Profile	Number
Agents	133
Workers and first line of supervision	1402 (1205 + 197)
Technicians	209
Professional	228
Supervisors and co-supervisors	146
Superintendents	53
Directors and equivalent	16
Expats	27
Total	2187

At the time of the site visit, the IESC understood that CBG employs 212 female workers, representing almost 10 % of CBG's direct workforce. In addition, the IESC understood that 36 % of CBG's direct employees comes from the region of Boke.

From the discussion with CBG HR Manager and review of the material shared after the May 2024 site visit, the IESC confirm that CBG has a solid Human Resource management, with clear procedures in place in relation to hiring / recruitment, labour management (including policies and code of conduct in place), performance evaluation, and regular interaction with Unions. The IESC also understands that attention has been given to the workers’ grievance management and to the implementation of CBG Worker’s Grievance Management Procedure. Indeed, CBG informed they started dedicated training on the procedure since 2022, with 2 sessions held in 2022 and another session organized in 2023 coupled with training on Human Rights. CBG’s HR Manager also presented the workers’ grievance register, stored on the SharePoint and which, at the time of the site visit, had 14 grievances recorded for 2024. The IESC did not receive the worker grievance register for review, despite the request, therefore a more thorough review of the grievances recorded will be undertaken in the next monitoring visit. The IESC appreciates the effort made by CBG to improve the implementation of the grievance management procedure and encourages CBG to continue raising awareness amongst workers on its use. Based on discussions held on site, the IESC understood that contractors’ grievances are not yet recorded in the register available on the SharePoint, but instead, are listed in separate registers, which is not in line with the current Grievance Management Procedure. The IESC acknowledges CBG’s increasing monitoring of Contractors’ grievance management (refer to sections below), nonetheless, a single consolidated repository to collect all grievances related to CBG’s operation is still required.

In May 2024, the IESC visited a site in Kamsar related to the CBG’s worker housing construction initiative, which commenced under an agreement between CBG’s management and the Union. The project’s objective is to furnish various housing options for participating CBG employees. While the IESC has not commented on the project in detail, observations indicate a recommendation for CBG to ensure the appointed construction firms adhere to all pertinent environmental and social procedures (further information detailed in Section 7.3).

7.3 Identification of OHS risks and impacts

The risks and impacts identified during the May 2024 site visit at the Kamsar plant, along the railway (including at contractor’s camps) and active mine in Sangarédi are detailed below.

7.3.1 Kamsar plant

Performance Standard 2: Kamsar plant	
Associated open finding(s)	New: May 2024_HS_001, May 2024_HS_010 Legacy: N/A

Tower TA10

In January 2024, CBG installed a new conveyor C12, and upgraded tower TA10 with the installation of two new vacuums designed to mitigate dust emissions at the source (arrival of the conveyor). Compared to the November 2023 visit, the improvement in working conditions in tower TA10 is significant: dust levels have been considerably reduced and Job Safety Analysis (JSA) for tasks performed by workers in tower TA10 are available and up to date. Furthermore, emergency stops and protective casings have been effectively implemented throughout.

According to the H&S teams, dust monitoring activities are carried out across the site (other buildings than the TA10 tower), to control the potential occupational exposure of workers and to define the measures of prevention and protection of the workstations. However, there is a lack of clarity regarding the parties responsible for these monitoring activities, their methodologies, and the dissemination of the findings. It is imperative that CBG clarify this point and should better inform the H&S teams on this topic.

Tora Bora waste facility

On the day of the visit, the waste incinerator was not operating due to a power supply problem on the network, however safety improvements made in response to some of the IESC previous findings are noted as follows:

- Fans now allow the interior of the incinerator to be cooled with the door kept closed;
- When the incinerator is lit, the display screen indicates the temperature inside the incinerator.

In addition, the office facilities have been improved with the installation of a canopy in front of the offices (to protect workers from the sun and rain).

Kamsar hazardous waste site

The development of the hazardous materials storage area in Kamsar is complete but not yet operational. At the time of the site visit, the facility was being filled with the first types of wastes. This facility will be subject to further IESC inspection once operational.

Although not complete, some hazardous materials are being transferred to the new site. Thus, CBG should install labels for each hazardous waste type stored at the facility.

7.3.2 Active Mine

Performance Standard 2: Sangarédi mine area	
Associated open finding(s)	New: May 2024_HS_002, May 2024_HS_003, May 2024_HS_004, May 2024_HS_005, May 2024_HS_006 Legacy: N/A

Blasting operation

In May 2024, the IESC attended a blasting operation. The IESC observed that the contractor (Nitrokemine Guinée - EPC Goupe) used a drone with an on-board camera to further check the area was clear immediately before and after blasting. The contractor used a radio to communicate and inform the mine control centre (PCC): the contractor and the operator at the PCC follow a procedure to confirm that messages have been received by all personnel present at the mine at the time of blasting. HSE documents were available on site with the contractor.

Sangarédi hazardous waste site

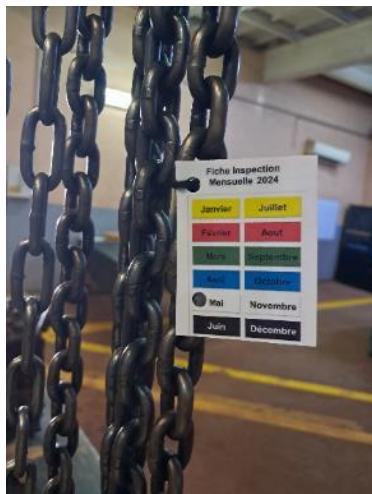
At Sangarédi, the hazardous waste site is currently being developed. Work is scheduled to be completed in December 2024. The development is in an area next to the domestic waste area. During the works, hazardous materials will be segregated and stored in containers, at in Kamsar. During the visit in May 2024, an employee from SOASA (the contractor in charge of waste management at Sangarédi) was interviewed. He was fully aware of the CBG golden rules, the assembly point, risks, PPE and the required H&S training that he had received.

Neemba heavy truck workshop (contractor)

The current Workshop Manager was present during the visit. He has been in this position for about 1 year and manages 77 people (technicians and administrative staff).

The Manager regularly takes part in toolbox meetings and conducts H&S inspections (the most recent were carried out the day before the visit) and safety awareness campaigns. The Manager is aware of the latest incidents that have occurred in the workshop and of the latest actions relating to these incidents (communication such as safety flash alerts and root cause analyses). In addition, it should be noted that CBG performed inspections at the workshop this year.

During the visit, it was noted that the procedure for managing lifting equipment (slings in particular) was not clear to workers in the workshop. Indeed, there was nothing to indicate whether the slings used on the day of the visit were compliant (safe to use) or not (the colour code for the month of May was not visible). The Neemba teams quickly found a solution to the problem (see photo below) but a similar observation was made during a previous visit. CBG should share and make all employees, and in particular H&S teams, aware of the rules concerning lifting equipment.



Picture 7.1 : Lifting chain with relevant monthly colour control system (the day after the visit)

Mine Control Centre (PCC)

At the mine control centre (PCC), there are 5 main radio channels for communicating with the teams working at the mine:

- Maintenance;
- Bauxite transport;
- Wagon loading;
- Fire prevention;
- Nitrokemine (blasting contractor).

The day of the visit, the radio used to make announcements simultaneously on all the channels in the mine had broken down. This failure is critical because one of the roles of the PCC is to manage co-activity at the mine. Without this radio, during blasting operations, the PCC controllers have to change channels frequently to transmit announcements to all the teams.

CBG should quickly repair the PCC's communication systems and have back up equipment for the most sensitive equipment (particularly the radios). *Post site visit note: CBG reported the radio was functioning in August 2024. This will be ground truthed during the next site visit.*

For several years, the mine's trucks have been equipped with a facial recognition system (according to the people interviewed, 23 of the 25 trucks are currently equipped; the 2 that are not equipped are not used). The system consists of a camera that detects whether the driver has his eyes closed or is talking on the phone. In these situations, it gives an audible and visual alert in the truck and takes a photo. The alerts are recorded in the system and simultaneously displayed on a screen in the PCC.

During the visit, the IESC noted that 10 alerts had been issued a few minutes earlier. The IESC asked the PCC operators about these alerts and found that they had not checked them. Moreover,

they didn't know the origin of these alerts. PCC regulators therefore do not systematically check all alerts from the facial recognition system. CBG should investigate why not all alerts are systematically checked and an analysis of the effectiveness of this system should also be conducted.

Created time	Originator	Type	Severity	Status	description
2024-05-15 16:24:42	CTRL-0013-0079	Drowsiness	Critique	effacée non acquittée	VCP156
2024-05-15 16:21:57	CTRL-0013-0086	Drowsiness	Critique	effacée non acquittée	VCP147
2024-05-15 16:21:54	CTRL-0013-0086	Drowsiness	Critique	effacée non acquittée	VCP147
2024-05-15 16:21:49	CTRL-0013-0086	Drowsiness	Critique	effacée non acquittée	VCP147
2024-05-15 16:21:46	CTRL-0013-0086	Drowsiness	Critique	effacée non acquittée	VCP147
2024-05-15 16:21:43	CTRL-0013-0086	Drowsiness	Critique	effacée non acquittée	VCP147
2024-05-15 16:21:39	CTRL-0013-0086	Drowsiness	Critique	effacée non acquittée	VCP147
2024-05-15 16:21:33	CTRL-0013-0086	Drowsiness	Critique	effacée non acquittée	VCP147

Picture 7.2 : Alerts from the facial recognition system

The controller at the PCC checks the location and activity of the trucks on a screen in front of him. Each truck is equipped with Global Positioning System (GPS) devices with real-time tracking from control screens. On his screen, the trucks change colour according to their activities: loading, unloading, movement and breaks. Driver rest breaks are checked by the PCC, particularly at night.

Railway wagons loading at N'Dangara

There are two railway wagon loading areas at Sangarédi mine site: N'Dangara and Parawi.

During the May 2024 visit, the IESC observed the loading of wagons at N'Dangara. Train wagons are loaded by 3 loaders at the same time. The risks of co-activity are managed with a large distance between the machines and there are no pedestrians in the immediate area.

Operators on the ground are placed on the other side of the train to check that the wheels of the train are not blocked by a stone that has fallen during loading. These operators are called "câbleurs", and they stay away from the train while it is being loaded, and are only allowed to approach the train when the foreman authorizes them to do so, when loading is complete.

The contractor interviewed (SOTRAC PLUS) was wearing the correct PPE, had attended H&S inductions and training and had taken part in Take5 in the morning before starting work. However, he was not aware of the CBG golden rules, and he did not know the assembly point in the case of an emergency. He said that he often walked on the mine roads to get back to the office (especially for breaks). The restriction on walking on haul roads is a major rule at the mine to mitigate accidents. CBG should repeat awareness campaigns on this risk and check its contractors to make sure they are organized to apply this rule.



Picture 7.3 : Railway wagons loading at N'Dangara (worker "câbleur" on the other side of the loaders)

Security guards

In November 2023, the IESC noted that the installation of toilets had begun at several security posts. In May 2024, the IESC observed that the installation of toilets was continuing. CBG inventoried all the security posts in Sangarédi and along the railway between Sangarédi and Kamsar. A map was made to identify the security posts already equipped with toilets (in green on the maps below) and those to be equipped (in yellow on the maps below).

In May 2024, at Sangarédi mine site, between 15 % and 20 % of security posts are equipped with toilets. Along the railway, between 40 % and 50 % of posts are currently equipped with toilets. CBG should confirm and continue its installation programme scheduled for 2025 and 2026.

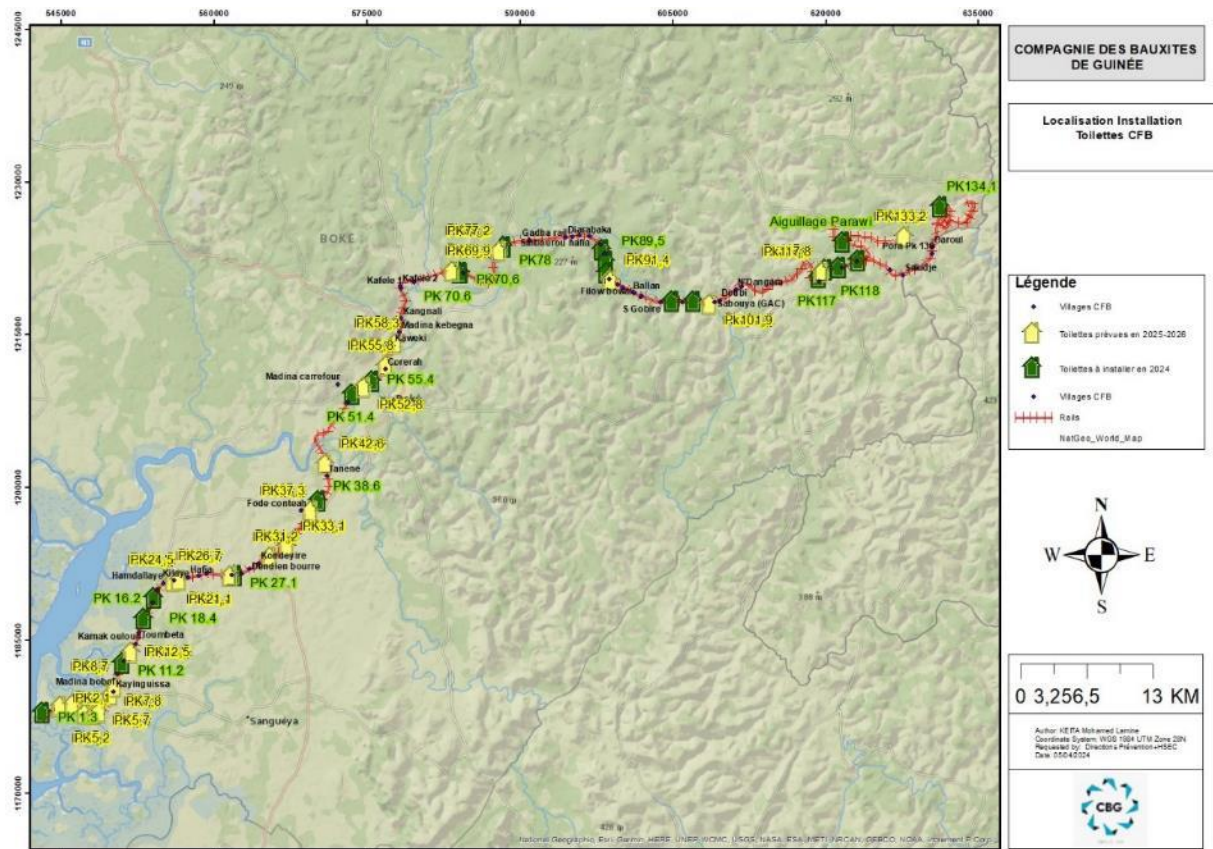


Figure 7.1: Security posts along the Railway line equipped with toilets (in green) or without toilets (in yellow)

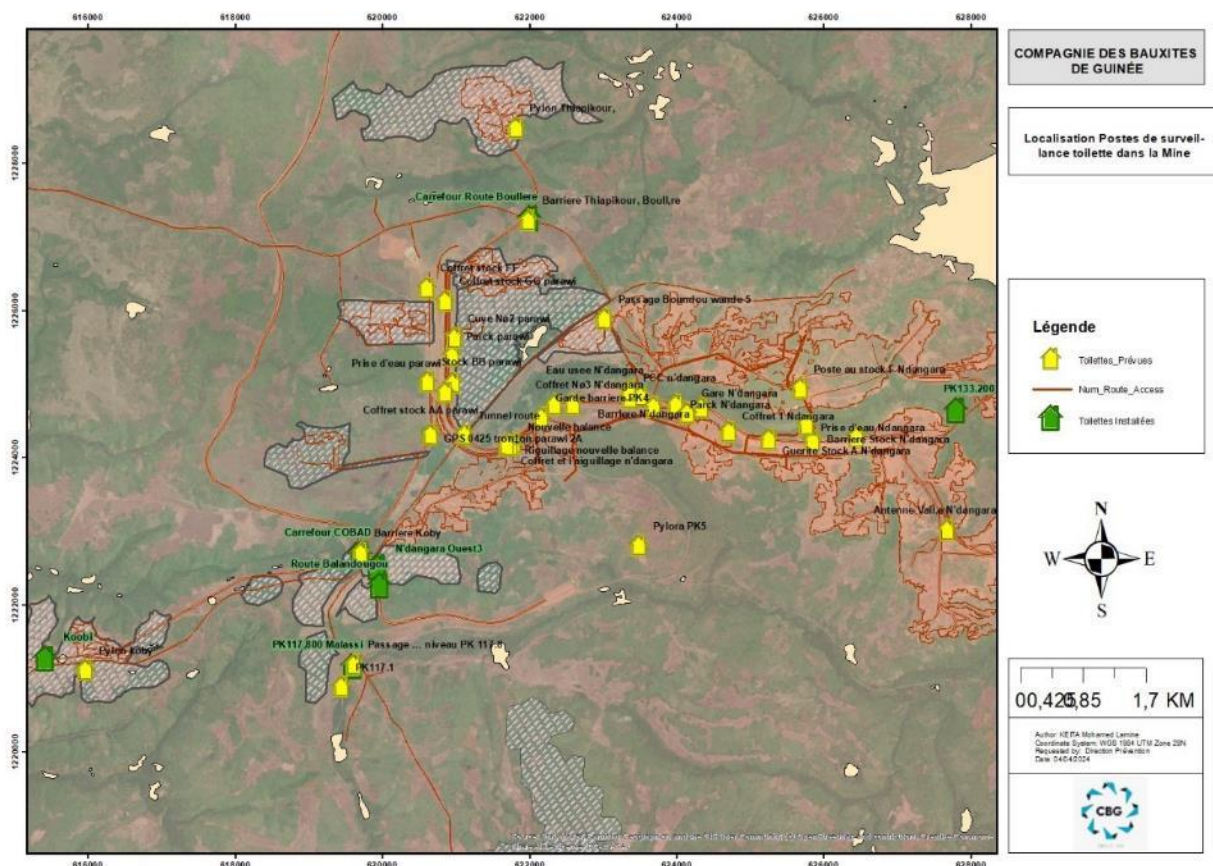


Figure 7.2: Security posts at Sangarédi mine site equipped with toilets (in green) or without toilets (in yellow)

7.3.3 Marshalling Yards and Railway

Performance Standard 2: Marshalling Yards and Railway	
Associated open finding(s)	New: N/A Legacy: Nov 2023_HS_002, Nov 2023_HS_003, June 2023_012, March 2022_023

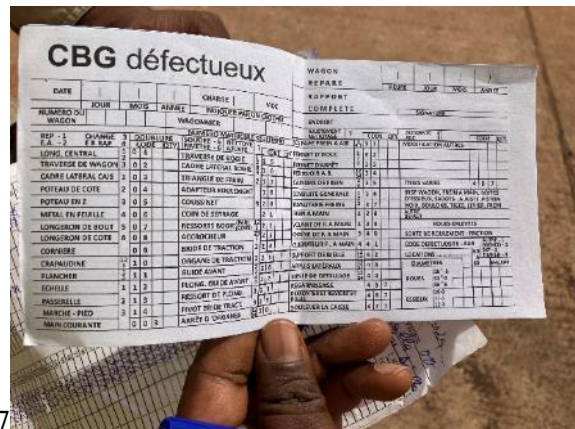
In Novembre 2023, the IESC visited the CCF (“Centre de Contrôle Ferroviaire”: railway control center room). During the May 2024 site visit, the IESC visited the Kamsar and Sangarédi marshalling yards, which are not managed by the CCF.

Kamsar and Sangarédi Marshalling Yard

The people interviewed at Kamsar described the timeline of train operations and movements:

1. Placement of wagons at the pit
2. Unloading of wagons
3. Inspection of wagons (see the inspection sheet in the photo below)
4. Assembling wagons and the locomotive for departure to Sangarédi
5. Inspection of outbound trains (see the inspection sheet in the photo below)

At Sangarédi, there are two marshalling yards (N'Dangara and Parawi) with a similar organization to Kamsar’s yard: The regulator (foreman) is the manager of operations and operators in the marshalling yard. There is a separate controller for the railway. All communications on site are done by radio through the foreman dedicated to the marshalling yard. The locomotive drivers themselves manually operate the switches to carry out the regulator's instructions. Each wagon gets preventive maintenance at least once a year (carried out in the railway workshop) unless a defect is noticed during the visual inspections (see the detailed operation timeline previously mentioned).



Pictures 7.4 and 7.5: Wagon inspection sheets

Railway contractor’s camps

The upgrade of the railway between Sangarédi and Kamsar involves building contractor’s camps to accommodate for workers. In November 2023, the IESC already visited the Tinguilinta and Boké camps erected for the Chinese contractor CRCC. The IESC had identified a number of findings in November 2023.

In May 2024, the IESC returned to visit the Tinguilita camp. On the way to the CRCC contractor's camp in Tinguilita, the IESC observed many workers walking on the road to return to the camp or to get to their workplace (whereas these workers should normally use the bus provided for these transfers).

Despite the H&S inspections conducted by CBG in 2024, after the IESC visit in November 2023 (where H&S issues were identified), gaps were still present in May 2024: the IESC visited a room that was still not equipped with a smoke detector. The nearby fire extinguisher didn't have a label showing the date of the last inspection, and there was no safety pin to ensure that it hadn't been used yet.

During the May 2024 site visit, approximately 80 workers were living in the camp (which is the camp's maximum capacity). CBG should intensify inspections and apply sanctions to its contractors in the event of non-compliance with H&S rules, in order to have a more effective system. Additional recommendations are included in Section 7.6

7.3.4 Building social housing

Performance Standard 2: Building social housing	
Associated open finding(s)	New: May 2024_HS_007 Legacy: N/A

A project to build around 90 social housing units in Conakry, Kamsar and Sangarédi is currently in progress. This project is supported by CBG's trade unions and the company in charge of the project (GESCHE) is not contractually linked to CBG. Nevertheless, CBG stated that the unions had selected the company according to the same requirements as the Contractor Management Plan and that they were requiring the same E&S standards for the implementation of this project. To do this, CBG is in the process of hiring 3 people to manage the Quality and H&S aspects.

During the May 2024 visit, the IESC visited an area under construction near Kamsar. The IESC found that GESCHE workers were not wearing all or any PPE to build the houses and that CBG had not conducted any H&S inspections on site.

Although a hiring process has recently been launched, in the interim CBG should carry out H&S inspections on these construction sites to ensure that GESCHE and other contractors apply appropriate HSE&S standards.

7.4 OHS system

7.4.1 Integrated Management System and ASI Certification

Performance Standard 2: Integrated Management System and ASI Certification	
Associated open finding(s)	New: N/A Legacy: N/A

In December 2023, CBG obtained the certification from the Aluminium Stewardship Initiative (ASI). This is good progress and demonstrates continuous improvement by CBG. However, it should be noted that certification is given despite 13 minor non-compliances relating to Environment, Social, Resettlement and Biodiversity. No non-compliance related to health and safety in relation to;

- Environment:
 - Emissions to Air

- Assessment and Management of Spills and Leakage
- Water assessment (mapping and management plans)
- Social and Resettlement:
 - Human Rights Due Diligence (remediation)
 - Free, Prior, and Informed Consent (FPIC) during community meetings
 - Resettlements (avoid or minimise and where unavoidable)
 - Local Communities (rights and interests and impacts)
 - Remuneration (living wage)
- Biodiversity:
 - Alien Species

7.4.2 Documentation process and Contractor Management Plan

Performance Standard 2: Documentation process and Contractor Management Plan	
Associated open finding(s)	New: May 2024_HS_006 Legacy: Nov 2023_HS_004, Nov 2023_HS_008

As mentioned in the previous monitoring report, CBG developed and deployed the new Contractor Management Plan (CMP) through the establishment of a committee involving the H&S, HR, procurement and legal departments. During the May 2024 site visit, CBG confirmed the start of inspections covering labour and working conditions, as required by the CMP. Based on the discussions held on site and the material shared for review, 35 contractors have been inspected at least once since the beginning of the inspections, in the second half of 2023, following the approval of the CMP. The IESC also notes a good level of progress in the inspections undertaken with an acceleration recorded in 2024 compared to the initial phase – as shown in Figure 7.3.6. Through the inspections, CBG recorded 896 non-compliances. Among the non-compliances recorded, the material shared for review informed that the majority are related to Health and Safety Aspects (76 %), following by non-compliances related to Labor and Working conditions and Human Rights (23 %), and to environmental aspects (1 %). Out of all non-compliances recorded, 51 % have been closed through follow-up inspections. CBG also shared the actual data of the number of inspections undertaken per contractor which the IESC deems positive as it shows CBG’s intention to progress and closely monitor CMP implementation and non-compliance closure.

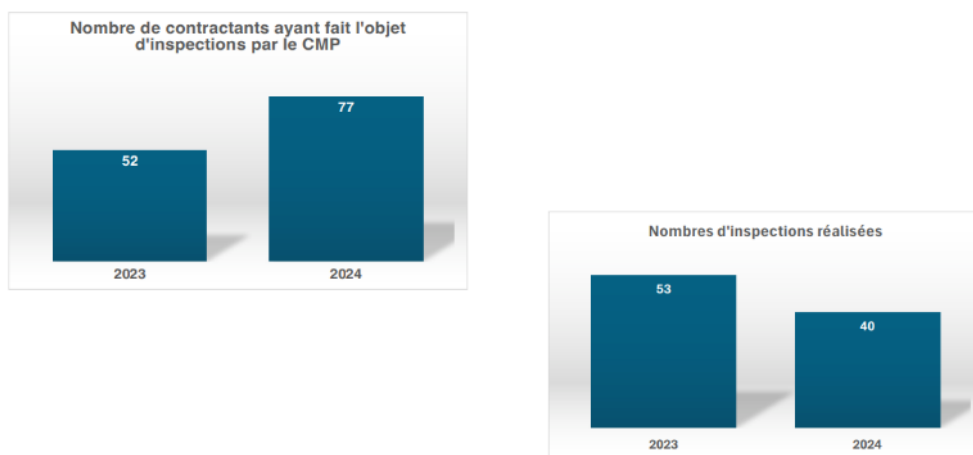


Figure 7.3.6: CBG data on the number of contractors inspected according to the CMP (on the left) and number of inspections undertaken (on the right)

During the May 2024 site visit, CBG informed the IESC that awareness training on grievance management for subcontractors was undertaken and that the grievance registers are now required onsite and checked via a specific section of the contractor inspection form. The Contractor Inspection form also includes a specific section on Human Rights, including verification of absence of force and child labor, living wage versus guaranteed minimum wage (SMIG), workers awareness on their rights, prohibition of any form of violence and harassment. The IESC noted all these improvements, however, based on some informal conversations held on site with some workers, the IESC understood that exceedances in contractors’ working hours are not regulated. It is recommended that CBG start monitoring exceedances of contractors’ working hours. On this matter, CBG should consider adding an addition point within the contractor inspection form and assess this aspect through inspections or through the undertaking of a rapid survey exercise.

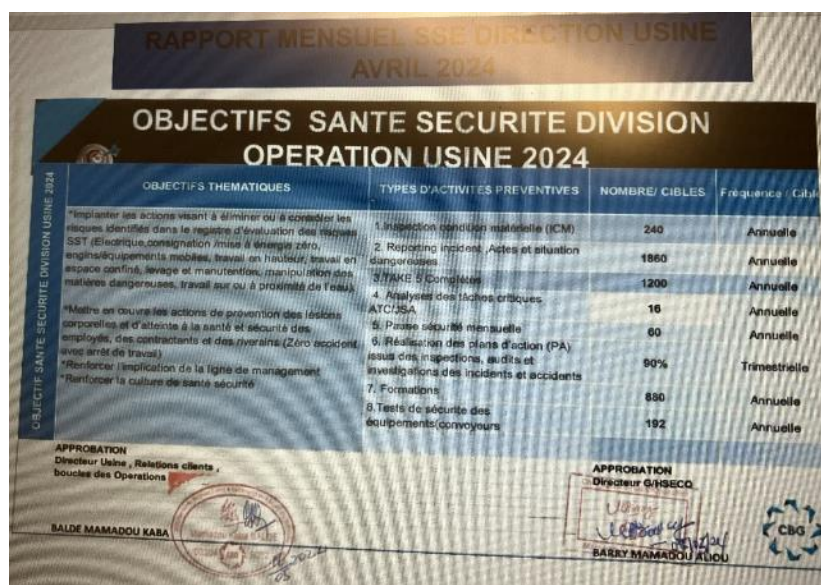
As previously reported, the contractor inspection form should be improved to better specify the scope of the inspection (inspection of a task or inspection of an area or a contractor etc.) and thus better identify risks and non-compliances. The management of corrective actions and non-compliances still needs to be improved to rank contractors more accurately according to their level of performance (such that future efforts can be focused on the higher risk contractors). CBG should also ensure that sufficient information and training is provided to the required employees as relevant to their roles, in relation to the audit and inspection process (see finding and details in section 7.4.2). The Isometrix tool should soon help the CMP Manager to manage all the actions and thus evaluate and rank the contractors.

7.5 OHS Organization and training

7.5.1 OHS organization

Performance Standard 2: OHS organization	
Associated open finding(s)	New: N/A Legacy: Nov 2023_HS_004, Nov 2023_HS_008, March 2022_007

The involvement of operational teams in OHS topics continues and each operational division continues to have annual H&S objectives (see photo below for the plant division).



Pictures 7.6.7: H&S 2024 objectives for the Plant Division

Nonetheless, and as already reported, CBG should provide training for the staff required to strengthen the audit and inspection process for contractors. The audit should have a clear objective and based on site observations and interviews.

7.5.2 OHS Training

Associated open finding(s)	New: May 2024_HS_008 Legacy: N/A
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As identified in the past years, there is still no system for tracking out-of-date certifications and training courses and the tool used to monitor training is basic, being based on a simple Excel table. Despite this, CBG continues to deploy its ambitious training plan each year and continues to include contractors in its own training management plan. A lot of H&S training courses are given by internal trainers (who are themselves trained externally). The figure below shows the internal training of employees and contractors in 2024.

FONCTION / MODULES	Nombre d'heures par fonction	Directeur Général	Directeurs	Chef Services	Superviseurs	Conducteurs de véhicules	Techniciens/Contrôleurs	Ouvriers	Chauffeurs	Compagnons/ouvriers	Réserve	Commentaires	Zone KAMARSAR					
													Periode	Lieu Formation	Formateur	Support		
Induction Générale HSEC	8	●	●	●	●	●	●	●	●	●	●	Janvier - Décembre	Toutes les personnes qui sont arrivées au résultat de la CBS	10/06 au 31/12	CDF	BEN	OUMAR BELLA	EN COURS
Outils de Gestion HSE (ATC, INS, Permis...)	40	●	●	●	●	●	●	●	●	●	●	Janvier - Décembre	Le Personnel d'encadrement et les ouvriers	10/06 au 31/12	CDF	BEN	BELLA/OUMAR	EN COURS
Travaux en Hauteur	6	●	●	●	●	●	●	●	●	●	●	Janvier - Décembre	Le Personnel d'encadrement et les ouvriers	01 au 19/07	CDF	OUMAR	SOW SAIDOU	EN COURS
12 règles d'Or	4	●	●	●	●	●	●	●	●	●	●	Janvier - Décembre	L'ensemble des travailleurs, compris les Contracteurs	10/06 au 31/12	CDF	BEN	BELLA/OUMAR	EN COURS
Formation des points fœcaux	40	●	●	●	●	●	●	●	●	●	●	Oct - novembre	Les points fœcaux dans les différents départements	26 au 30/07	CDF	BEN	BELLA/OUMAR	NON DEBUTE
Conservation et Mise à énergie Zéro	4	●	●	●	●	●	●	●	●	●	●	Janvier - Juin	L'ensemble des electriciens	17 au 28/06	CDF	OUMAR	SAIDOU SOW	EN COURS
Biodiversité	4	●	●	●	●	●	●	●	●	●	●	Janvier - Décembre	Les responsables et certains points fœcaux dans les départements	16 au 20/09	LABO	AISSATOU DOBO	ZACRO	NON DEBUTE
Utilisation des Matéria Dangereux	8	●	●	●	●	●	●	●	●	●	●	Février - Avril	Tous les utilisateurs de produit dangereux	14 au 18/10	LABO	MADIARILOU	SADIALIOU	NON DEBUTE
Plaisance à la Mer	4	●	●	●	●	●	●	●	●	●	●	Janvier - Décembre	Les ouvriers et l'encadrement	13 au 31/05	CDF	AHOUSSA	FLORENT/LOUA	NON DEBUTE
Rôle et Responsabilité des Leaders en HSE	4	●	●	●	●	●	●	●	●	●	●	Janvier - Décembre	Tous les responsables dans les départements	05 au 16/08	CDF	DIA	CAMARA	NON DEBUTE
Protection de l'Environnement	4	●	●	●	●	●	●	●	●	●	●	Janvier - Décembre	L'encadrement et l'encadrement	07 au 18/10	CDF	TRACRE	KEITA	NON DEBUTE
Entrée en Espace Confiné	4	●	●	●	●	●	●	●	●	●	●	Mai - Novembre	Les ouvriers et l'encadrement	12 au 23/08	CDF	DIA	SADIALIOU	NON DEBUTE
Habilitation Electrique	4	●	●	●	●	●	●	●	●	●	●	Mai - Novembre	Les ouvriers et l'encadrement	17 au 28/06	CDF	OUMAR	SAIDOU SOW	EN COURS
Manutention Manuelle	4	●	●	●	●	●	●	●	●	●	●	Oct - Novembre	Les ouvriers et l'encadrement	11 au 15/11	CDF	FLORENT	LOUA/SAVANE	NON DEBUTE

Figure 7.4.8: Internal training of employees and contractors at Kamsar

The IESC has not received any information or documents enabling it to review the progress of external training. These external training are mainly those on critical risks (= fatal risks) provided to H&S teams and managers by experts from Rio Tinto/Alcoa and the Dupond DSS+ (leadership in safety) training course for the top management (Directors). CBG should provide progress updates of the implementation of this strategy and training during the next site visit.

7.6 Workers Engaged by Third Parties

Performance Standard 2: Workers Engaged by Third Parties	
Associated open finding(s)	New: N/A Legacy: Oct 2021_016, Nov 2023_SO_004, Nov 2023_SO_005

H&S observations for subcontractors are already included in section 7.3 of this report. This section aims at making observation on the working conditions of third parties' workers.

As indicated above, the IESC visited the China Railway Construction Corporation (CRCC) Camp in Tinguilinta for the second time in May 2024. The camp was operational in May 2024 whereas in November 2023, when it was last visited, it was reportedly still under construction.

Even though some improvements were made from November 2023 to May 2024, such as the incorporation of smaller rooms, basketball court installation, and the availability of grievance registers, CRCC’s camp in Tinguilinta continued to show several non-compliances, among which:

- A second group of toilets in sheet metal observed in poor conditions with limited ventilation.
- Absence of rest and dining areas,
- Rooms observed with insufficient space and furniture, and absence of lockers to ensure storage of personal belongings.
- Presence of mosquito nets was inconsistent across the different rooms
- Kitchen was not used by all workers as it is not meeting all workers’ food preferences due to cultural differences (only Chinese food is provided in the Camp’s kitchen).

The 12 beds per container observed during the November 2023 site visit were still in place, but each container was used by 6 workers, who used the remaining beds for storage. The IESC deems this insufficient to meet compliance, due to the insufficient space made available for each worker and lack of private space/storage.

The IESC understands that the CRCC’s camp in Tinguilinta should be operational a few more months (around 3 months from the site visit). After that, all workers will be hosted by the accommodation camp in Boke, which will be the only one used by this Contractor. Regardless, and as previously reported, accommodation camps should be inspected and non-compliances identified in accordance with international standards, in particular the IFC/EBRD Guidance note Workers’ accommodation: processes and standards⁹.

Additional recommendations on the worker grievance mechanism are included in Sections 7.2 and 7.4.2.



Pictures 7.7:9 Tinguilinta camps (photos taken during the November 2023 site visit)

7.7 Monitoring and review

7.7.1 Incident Investigations and Root Cause Analysis

Performance Standard 2: Incident Investigations and Root Cause Analysis	
Associated open finding(s)	New: N/A Legacy: June 2023_012

⁹ <https://www.ifc.org/en/insights-reports/2000/publications-gpn-workersaccommodation>

Train derailment in September 2023

This section focuses on the corrective action plan launched after the major accident that occurred on 15 September 2023 (derailment of train N°418 at PK18.4) and implemented after the last IESC visit in November 2023.

In May 2024, the progress of actions following the accident are as follow:

- Installation of a weighing scale after train loading (weighing at the level of each axle of the train to identify heterogeneous loads). The weighing report is sent to the mine.
- A second scale is in the process of being purchased (the purchase request has been made and its future location has been identified).
- Clarification of the different types of wagon inspections:
 - Dynamic inspections (visual and audible) performed by 2 people (1 on each side of the train) as the train rolls into the marshalling yard,
 - Static inspections (checking wheel wear and brake condition) conducted by 4 people,
 - Dynamic inspections (visual and audible) performed by 3 people (1 on each side of the train and 1 at the rear) when the train is departing,

According to the people interviewed, a wagon was recently taken out of service because it had broken bearings.
- A French audible alert code has been introduced for radio communications: it is 'déraillement'. This code must be used in the event of an emergency (derailment or near derailment).
- An emergency drill is scheduled for May 2024 to test this new radio alert code. *Post site visit note: CBG informed the emergency drills have been conducted and a radio alert code has been tested. This will be investigated as part of the next site visit.*

COBAD fatality

During the May 2024 visit, the IESC went to the area where a collision of a motorcyclist with a COBAD train incident led to the death of the motorcyclist. This incident occurred in a section managed by COBAD, approximately 150 meters before connecting to the main railway line to Kamsar (PK16).

According to the people present on the day of the incident, the motorcyclist was riding on the road in the direction of PK16. The barrier guard had lowered the barrier because a train was travelling on the railway line. The motorcyclist tried to pass between the barrier post and the railway track (where a train was moving). There was a rope on the ground. As it passed over the rope, the motorbike slipped and came closer to the train, which was still moving. The motorbike and its rider were therefore caught up in the train.

CBG is not directly involved in this incident, but CBG has informed COBAD that it is ready to help if necessary. In addition, CBG has asked COBAD to communicate the results of the investigation and the measures taken after the incident in order to make improvements to the CBG's systems and teams, if necessary.

7.7.2 KPIs

For several years, CBG has been identifying and monitoring a series of leading indicators (e.g. events with a high severity potential), which help to better understand safety issues before they develop into significant incidents. However, the indicators transmitted during the May 2024 visit show delays in relation to the annual targets (see picture below). Indeed, the safety talks and inspections are behind schedule (as of the end of April), the number of events (total and near miss)

and the directors' inspections are also behind schedule. This trend will be checked by the IESC during the next visit and tracked by CBG in the H&S reporting documents.

Monthly H&S meetings with the top management of each division are still in place. These meetings provide an opportunity to share the H&S indicators for each division. This approach is effective as it enables H&S Teams to challenge divisions that are lagging behind schedule and reward divisions that are complying with their objectives and commitments.

Principaux outils préventifs Week 18 (Du29 avril au 05 Mai 2024)	Semaine 18	Mois d' Avril	Année à date (AAD)	Cible	Commentaire
• Quasi-incidents et/ou situations dangereuses	20	48	150	780	
• Total évènements rapportés	30	69	221	3000	
• Inspections croisées des Directeurs	00	01	13	60	
• Autres inspections effectuées	07	10	24	1300	
• Observations sécurité	10	32	203	1170	
• Analyses de tâche (ATC/JSA)	07	18	100	313	
• Permis de travail libérés	13	36	205	ND	
• Induction générale (Nbre de pers.)	102	524	2590	3120	
• Formations spécifiques HSE(Nbre de pers.)	9	17	59	2080	40 heures
• Rapports d'analyses SIR complétés < 21 jours	0	08	10	ND	
• Tests alcool effectués/test positif	0	05	1142	6000	
• Pause ou (¼ d'heure) sécurité du Management	2	5	21	1041	Usine et Garage

Figure 7.510: Leading/proactive H&S KPIs 2024 (through to April)

7.7.3 OHS Performance

Performance Standard 2: OHS Performance	
Associated open finding(s)	New: NA Legacy: Nov 2023_HS_006

The significant efforts noted during previous visits continue. The monitoring and review of KPIs, the improvement of the vision of the situation and the sharing of this situation with division managers as well as the OHS objectives for each division and the overall improvement of the safety culture are in place.

However, the previous finding relating to the update of the OHSMP to improve the completion time of certain actions is still open. This work hasn't started yet to efficiently manage the leading actions and KPIs within a reasonable time frame. *Post site visit note: In August 2024, CBG mentioned the OHSMP was under revision.*

7.8 PS2 Open findings

7.8.1 PS2 High significance findings

Table 7-1: Summary of open high significance Findings, PS2

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_HS_001	Risk Assessment at the Kamsar plant	Confirm, update if required and share with the H&S teams the dust and noise monitoring process for occupational exposure.	The H&S teams should be aware of the dust and noise monitoring conducted on site to control the potential occupational exposure. They also have to know the results to define and adapt the measures of prevention and protection of the workstations.	High	Open (new)
May 2024_HS_002	Risks and impacts	The procedure for managing lifting equipment (slings in particular) was still not clear to workers in the workshop (a similar observation was made during a previous visit).	CBG should share and make all employees, and in particular H&S teams, aware of the rules concerning lifting equipment.	High	Open (new)
May 2024_HS_003	Risks and impacts	The radio used to make announcements simultaneously on all the channels in the mine had broken down.	CBG should quickly repair the PCC's communication systems and have back up equipment for the most critical communication systems (particularly the radios).	High	Open (new). <i>Post site visit note: CBG reported the radio was functioning in August 2024. This will be ground truthed during the next site visit.</i>
May 2024_HS_004	Risks and impacts	Operatives in the PCC did not check the origin of 10 alerts from trucks facial recognition system suggesting they do not	CBG should investigate all alerts are not systematically checked and conduct an analysis of the effectiveness of this system.	High	Open (new)

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		systematically check all alerts.			
May 2024_HS_005	Risks and impacts	Poor H&S culture and poor H&S knowledge of the contractor interviewed.	At Sangarédi, on the N'Dangara railway wagon loading area, the contractor interviewed (SOTRAC PLUS) was not aware of the CBG golden rules, and he did not know the assembly point in the case of an emergency. CBG should repeat awareness campaigns on this risk and check its contractors to make sure they are organised to apply these rules.	High	Open (new)
May 2024_HS_006	Traffic on mine haul roads (workers and communities)	The risk of pedestrian/truck or vehicle/truck collision is not controlled.	<ul style="list-style-type: none"> Workers (contractors) often walk on the mine roads to get back to the office (especially for breaks). CBG should intensify inspections and apply sanctions to its contractors in the event of non-compliance with H&S rules Physical separations between community traffic lanes and mine haul roads need to be provided whilst clear markings/signs, informing individuals of the danger and prohibition to cross, need to be established/installed. Road signs for mine trucks need to be reinforced and a way to improve drivers' knowledge of the traffic plan needs to be identified and implemented CBG should ensure to close access to the old community roads, particularly if not guarded 	High	Open (new)
Nov 2023_HS_002	Working conditions of the train drivers	In addition to the issues of signalling and communication between workers on or near the railway lines (June 2023_012), the working	Train drivers should be able to take a break during their journeys and journey times should not exceed 12 hours Emergency drills need to be conducted to test all workers' behavior and test radio communication. These drills could be used to determine and test radio alert codes	High	Open (Partly in progress, but the drill should be completed after the IESC visit in May 2024) <i>Post site visit note: CBG informed the emergency</i>

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		conditions of train drivers should be improved.			<i>drills have been conducted and a radio alert code has been tested. This will be investigated as part of the next site visit, the IESC will look at the drill register to ensure this finding can be closed</i>
Nov 2023_SO_005	Workers Engaged by Third Parties_Worker camp	At the Tinguilinta camps several non-compliances were observed, including presence of 12 beds in one container, lack of lockers, and recreational facilities.	Improvements in the conditions of the Tinguilinta camp and the facilities provided be made as a matter of priority, in line with IFC/EBRD Guidance note Workers' accommodation: processes and standards.	High	Open. Despite improvements, this finding remains open.
June 2023_012	Monitoring and review	Incident Investigations and Root Cause Analysis	<ul style="list-style-type: none"> • Close all outstanding actions relating to the fatality • Last railway fatality: <ul style="list-style-type: none"> ○ Define methods for sharing H&S information between workers (shift changes) ○ Clarify and test the feasibility of the new distance required between the track and the switchmen or flagmen ○ Strengthen the communication between the CCF and all workers (switchmen and flagmen) in the vicinity of the railway track ○ A specific action plan should be prepared and discussed with all stakeholders using and working on the railway 	High	Open (Ongoing) (A new automation system is being implemented and training has been provided but the working conditions are the same)

The 'closed' findings from the previous IESC monitoring visits are provided in [Appendix 2](#) of this report.

7.8.2 PS2 Moderate significance findings

Table 7-2 Summary of open moderate significance Findings, PS2

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_SO_002	Worker Grievance Mechanism	Grievances submitted by contractors are not yet recorded on SharePoint which is not in line with the current Grievance Management Procedure.	A consolidated single repository to collect all grievances related to CBG's operation is required.	Moderate	Open (new) Even though the workers' grievance mechanism was observed in implementation, improvements are still needed to collect and monitor grievances from subcontractors.
May 2024_HS_010	Risks and impacts	Despite the absence of storage labels, the first hazardous waste is beginning to be stored in the hazardous materials storage area in Kamsar.	CBG should install hazardous waste labels in the areas provided for each waste.	Moderate	Open (new)
May 2024_HS_007	Social housing	CBG hasn't conducted any H&S inspections on building social housing construction sites	CBG should carry out H&S inspections on building social housing construction sites to ensure that contractors apply E&S standards	Moderate	Open (new)
May 2024_HS_008	OHS training	The IESC has not received any information or documents for its review of external trainings progress.	CBG should provide progress updates of the implementation of this strategy and training.	Moderate	Open (new)
May 2024_HS_009	OHS KPIs	April KPIs show delays compared to annual targets (safety talks, total number of inspections, total number of events and near miss and the directors' inspections)	This trend should be tracked and analysed by CBG in the coming months.	Moderate	Open (new)
Nov 2023_HS_003	Risks and impacts	Numerous findings from railway contractor's camps (CRCC).	The Tinguilinta camp:	Moderate	Open and updated in May 2024. Despite improvements

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		<p>CBG should intensify inspections and apply sanctions to its contractors in the event of non-compliance with H&S rules</p>	<ul style="list-style-type: none"> • No fire extinguishers or smoke detector in the rooms visited • Accessible and exposed electrical wires • Fire extinguisher didn't have a label showing the date of the last inspection, and there was no safety pin to ensure that it hadn't been used yet • many workers walking on the road to return to the camp or to get to the workplace • No air conditioning in the kitchen. • CBG's HSE team had not inspected the camp during this setting-up phase. <p>The Boké camp</p> <ul style="list-style-type: none"> • No smoke detector in the rooms visited • Some safety displays (e.g. fire extinguisher labels) were only in Chinese, even though Guineans are also present in the camp. 		<p>(see struck out text), this finding remains open</p>
<p>Nov 2023_HS_008</p>	<p>OHS organization</p>	<p>Provide training for the staff required to strengthen the audit and inspection process.</p>	<p>CBG should ensure that sufficient training is provided to the required employees as relevant to their roles, in relation to the audit and inspection process. The training should cover the scope of the on-site audit or inspection and focus on the observation and interview approach.</p>	<p>Moderate</p>	<p>Open</p>
<p>Nov 2023_HS_004</p>	<p>Contractor Management Plan</p>	<p>Rank contractors more accurately according to their level of performance (such that future efforts can be focused on the higher risk contractors).</p>	<ul style="list-style-type: none"> • Improve the contractor inspection form to include: <ul style="list-style-type: none"> ○ the scope of the inspection (a task or an area or a contractor) and thus better identify risks and non-compliances ○ a check of the grievance register 	<p>Moderate</p>	<p>Open. Despite improvements, this finding remains open</p>

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
			<ul style="list-style-type: none"> • Improve the management of corrective actions and non-compliances • CBG to further verify training on Security and Human Rights provided to security guards 		
Nov 2023_HS_006	OHS performance	Update the OHSMP to improve the time to completion of certain actions	CBG should review the Occupational Health and Safety Management Plan (the OHSMP) to better define the actions (H&S scope, time evolution) and ensure that they don't continue for several years. CBG should define more concrete and shorter deadlines and be able to reformulate an action if necessary (if the context or situation changes). If, it ultimately no longer corresponds to the need, or if an action takes longer than expected, this may require a new temporary action, but this must be recorded and documented in the action plan.	Moderate	Open (Actions not started)
March 2022_007	OHS Training	<p>The training management tool is not adapted to CBG; there is no system for tracking out-of-date certifications and training courses and the tool used to monitor training is too basic.</p> <p>There is no formal verification of trainees' understanding at the end of safety induction training.</p>	<p>Training management – Establish an appropriate system or more efficient tool (e.g. automatic reminders for refresher training, tracking out-of-date certifications, list of employees eligible for training based on roles). This will ensure that only personnel with up-to-date certification and training are assigned to perform critical operational and maintenance tasks.</p> <p>The training plan should include specific training for OHS teams and for Managers.</p>	Moderate	Open (OHS Training will be integrated on the IsoMetrix database; The Golden Rules are included in the safety induction)
March 2022_023	Hommes Piquets	<p>Based on the IESC's impromptu meetings with Hommes Piquets it was found that lacked information and authority to perform their duties, including:</p> <ul style="list-style-type: none"> • No train timetable 	CBG should use an official and more-structured control system for rail activities. CBG need to confirm that all personnel present along the railway are aware before the passage of trains. Kilometre posts need to be installed, alongside railway signs for the communities, and a way to communicate the train schedule to the hommes piquet needs to be identified and implemented.	Moderate	Open (A new automation system is being implemented and training has been provided but the working conditions are the same)

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		<ul style="list-style-type: none"> • No means or authority to stop the train in an emergency situation • Poor understanding of their own risks 	All hommes piquet should be issued with VHF radio/other means of communication such that they can communicate with the train driver. Training in Railway Safety Communications Procedures, as prescribed in the Road and Rail Safety Management Plan, should be provided.		
Oct 2021_016	Management of suppliers	The roll-out of labour and working conditions requirements does not yet extend to suppliers	Design of an action programme to apply the relevant PS2 requirements to CBG's suppliers (those that fall into the definition of a contractor as presented in PS2)	Moderate	Open (Item not assessed and will be investigated during the next site visit)

The 'closed' findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

7.8.3 PS2 Minor significance findings

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Nov_2023_SO_004	Worker Grievance Mechanism	Despite the training undertaken in 2023, workers do not use the grievance mechanism officially. While workers tend to ask for meetings to express complaints or requests regularly, a correct implementation of CBG's worker grievance mechanism procedure is not occurring, and no formal worker grievance register exists to verify number and types of complaints received.	A correct implementation of the worker grievance mechanism should occur: CBG to analyse reasons for the poor implementation of the worker grievance mechanism and verify needs for update of the worker grievance mechanism procedure. CBG should also carefully verify that relevant topics are presented to all workers, including subcontractors' workers, and that particular sensitization is regularly made on the purpose of reminding that there will be no retaliation or discrimination against those that express grievances.	Minor	Open (Implementation and monitoring of the worker grievance mechanism now underway though improvements are still required. Recommended actions still valid. Item downgraded to Minor)

The 'closed' findings from previous IESC monitoring visits are provided in [Appendix 2](#) of this report.

8. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

8.1 Introduction

CBG’s progress in the implementation of various environmental management plans and, specifically, action plans embedded within the management plans, is described in this chapter. The plans considered are as follows: environmental monitoring, dredging, air quality, water quality, noise and vibration, use of resources and energy efficiency and waste management.

8.2 Environmental Monitoring

The November 2023 IESC Monitoring Report highlighted the following areas of progress:

- 100 % environmental monitoring performed (except from the air quality fixed station in Kamsar) due to the increased capacity of the environmental monitoring team (1 additional person since June 2023);
- Similarly to the situation in June 2023, ambient air quality is not monitored at the fixed air quality monitoring station in Kamsar due to equipment malfunctions (however mobile stations are operational);
- Information on environmental monitoring results has been disclosed to the communities, following the participatory monitoring procedure.

According to CBG and as of May 2024, the status is as follows:

- 100 % environmental monitoring performed (except from the air quality fixed station in Kamsar) due to the increased capacity of the environmental monitoring team (1 additional person since June 2023);
- Similarly to the situation in June 2023, ambient air quality is not monitored at the fixed air quality monitoring station in Kamsar due to equipment malfunctions (however mobile stations are operational);
- Information on environmental monitoring results has been disclosed to the communities, following the participatory monitoring procedure.

Update on the environmental monitoring following the May 2024 site visit is provided below.

8.2.1 Environmental Monitoring Programme

Performance Standard 3: Environmental Monitoring Programme	
Associated open finding(s)	New: N/A Legacy: N/A

CBG has made significant progress to meet the expectations of the Environmental Monitoring Programme (EMoP), leading to the collection of 100% of the planned environmental samples since October 2023 (excluding the fixed air monitoring station in Kamsar).

CBG undertook the review of its EMoP, and in March 2024, the 2024 EMoP was approved by the Lenders.

As CBG mining activities grow on other plateaus, it is understood that CBG is adding new sampling points to monitor the new mining areas, however without updating the EMoP. The EMoP should be viewed as a live document requiring frequent update to reflect the opening of new plateaus or

updates to other EMPs (for example the AQMP). Over time, the IESC will evaluate how well the EMoP aligns with the evolving operations of CBG.

8.2.2 Environmental monitoring database

All environmental management plans, results from the environmental monitoring, and other environmental related documentation (such as the presentations given during the ASI and IESC audits) are available on a SharePoint and accessible to the CBG environmental team. As mentioned in the PS1 section, IsoMetrix isn't implemented for environmental monitoring results yet. No deadline for its use with environmental data was provided, however the Sharepoint has been observed to work and to be used by most CBG employees interviewed during the visit.

8.2.3 Disclosure of Monitoring Results

Performance Standard 3: Disclosure of Monitoring Results	
Associated open finding(s)	New: N/A Legacy: Dec 2022_013 (mentioned in PS1)

The IESC previously reported on CBG's commitment, as stated in its management plans, to disclose the results of environmental monitoring to the communities affected. Since the last site visit, CBG has engaged with representatives from 18 villages regarding this matter. The engagement included discussions on the methods of measuring water, air, noise, and vibrations, as well as the interpretation of the results. This also involved the participation of community members in collecting the Q4 2023 monitoring data. Subsequently, CBG and the village representatives engaged in a month-long dialogue concerning the format of the disclosure, which is expected to culminate in a communication protocol by the end of May 2024. The draft of the communication protocol plans for the quarterly dissemination of results.

This protocol will initially be piloted in one village, and then, following feedback from the community, applied to the remaining 17 villages. The protocol will be subject to periodic review based on the communities' feedback. The finding related to this topic will be deemed closed once documentary evidence will be provided.

Post site visit note: At the time of writing, a copy of the communication protocol was yet to be shared with the IESC for review.

8.3 Water Quality

Water management was identified as a focus area for the June 2023 monitoring visit, when the IESC visited the domestic wastewater facilities in Kamsar and Sangarédi, the industrial wastewater treatment at the tank farm (Kamsar), the Cogon drinking water plant in Sangarédi, sedimentation ponds built in 2020 located upstream from Fassaly Foutabhé village. In June 2023, the IESC environmental and resettlement specialists also met with members from the Fassaly Foutabhé village. In November 2023, water management was again a focus area for the site visit, with visits to future surface water management infrastructure in Sangarédi and surface water outlets and lakes (used for dust management) in Kamsar. The IESC environmental specialist was also able to meet with community members from the village of Fassaly Belendéré, SNAPE's¹⁰ representative, and the Ministry of Water and Forest.

During the May 2024 site visit, the IESC:

¹⁰ SNAPE - Service National des Points d'Eau de Guinée/Guinea's National Water Points Service

- Led deep-dive discussions with the CBG teams (with the environmental team alone, and on some occasions, with the environmental and community relations teams cocurrently),
- Visited the Cogon drinking water plant, the Kamsar wastewater treatment plant, and the Sangarédi wastewater treatment plant.

The primary aim was to follow up on the implementation of actions taken by CBG teams on findings from earlier reports, particularly those related to findings of high significance. This visit provided information relevant to a number of priority areas as follows:

- Implementation of Water Management Plan – general status;
- Surface water drainage at Kamsar port – follow up of findings from previous IESC reports;
- Surface water management at Sangarédi - follow up of findings from previous IESC reports.

8.3.1 Water Management Plan (WMP) – status of implementation and update

Associated open finding(s)	New: May 2024_EN_002 Legacy: N/A
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The figure below shows planned progress against actual progress in implementing actions within the Water Management Plan as of Q1, 2024.

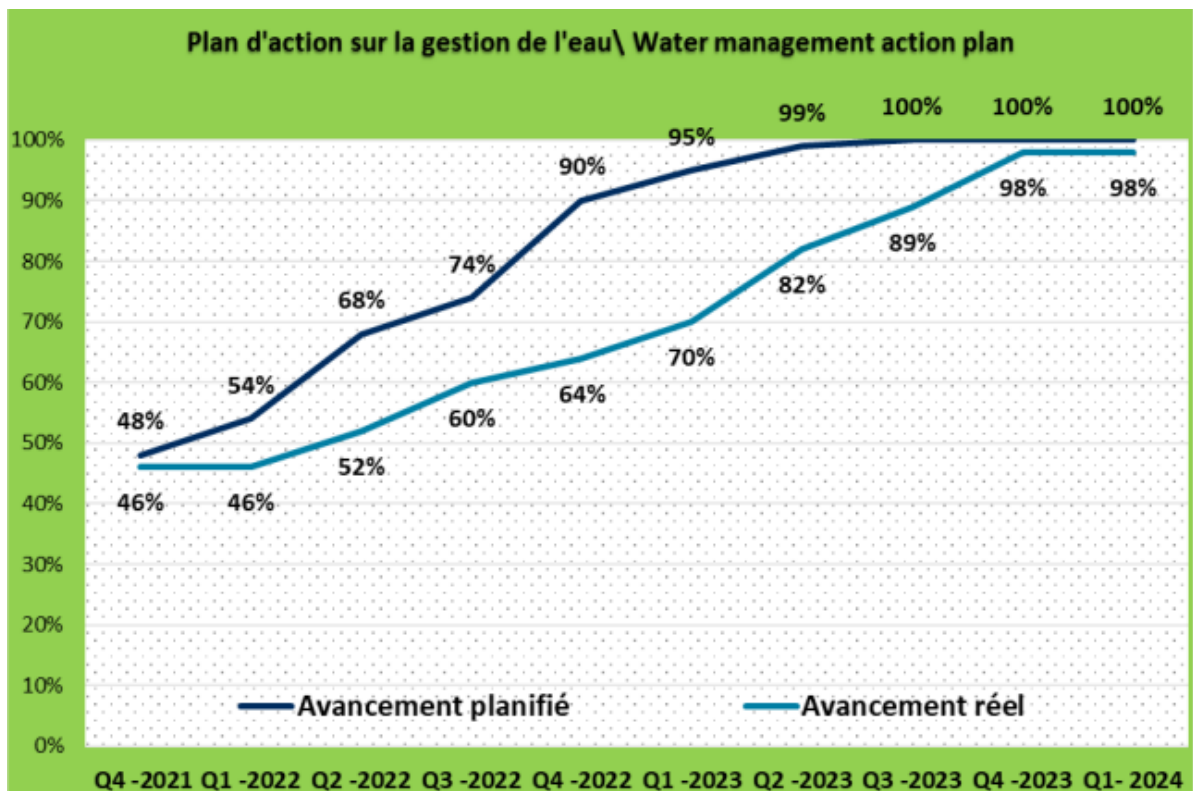


Figure 8.1: Status of Water Management Action Plan implementation (as of end November 2023)

According to CBG, the 4 remaining actions making the 2 % to completion of the Water Management Plan are the following (details for the bullet points below are discussed in the following subsection):

- The drainage capacity upgrade at the Kamsar plant;

- The 'Grand Canal' rehabilitation;
- The removal of sediments in the 'Grand Canal'; and
- The recalibration of the Water Balance Model for Sangarédi (hydro/groundwater model recalibration).

However, the Water Management Action Plan lists multiple actions, for which CBG didn't provide an update since 2022 (date of the latest WMP and still in application today), and many of which are 'not started' as of the 2022. Although the IESC recognises the great improvements and enhancements related to water aspects in the past 6 years, the completion of some of the actions pertaining to the WMP will be challenged on the next site visit. Among them:

- Action 2.5.4: 'add a ditch surrounding the plateau leading to a sedimentation basin to prevent turbidity in the neighbouring streams and rivers'.
- Action 2.9: 'Update the water balance around mining activities on a yearly basis as more monitoring data become available'.
- Action 2.10: 'Investigate the levels of Silicon in surface water and levels of Vanadium, Titanium, and Chromium found in sediments'.
- Action 5.6: 'Provide the HSEC team with a boat to work in rivers with high waters'.
- Action 5.8: 'Update the WMP based on the results of the Phase 2 Addendum ESIA'.

As mentioned above, the WMP was last issued in September 2022. As an updated of this plan is planned every 2 years, the IESC will include an inquiry into the status of the Water Management Plan during the next site visit.

8.3.2 Surface water drainage from Kamsar site

Performance Standard 3: Surface water drainage at Kamsar	
Associated open finding(s)	New: N/A Legacy: Nov 2023_EN_014, Dec 2022_031

Surface water quality

The surface water flowing onto the Kamsar site is collected through a system of drains, which subsequently flow into the sea (12 surface water exit points to the sea). These exit points include the 'Grand Canal' and the industrial wastewater outlet (where the oil/water separator unit is installed).

The 'Grand Canal' or 'Grand Caniveau Central' (located east from the bauxite stockpiles) gathers surface waters flowing from the stockpiles.

The IESC March 2022 report mentions that elevated COD levels and suspended sediments were recorded in surface river water surrounding the Kamsar processing facility, and that surface water discharge channels (fed by dewatering of the primary crusher pit) were heavily laden with fine sediments and were observed discharging to the River Dougoufisa with no sediment trap in place.

The latest IESC reports (June and November 2023) mention that half the suspended materials measured at the surface water monitoring points in late May - early June 2023 were higher than the thresholds, and that campaigns on the 20th November and the 6th December 2023 show a total iron concentration at least 60 times higher than the limit, and a very acidic pH (around 3).

Results communicated for March 2024, dated 20th and 26th confirm a very low pH at the Grand Canal outlet (4.98 and 5.81 respectively). Results for metal concentrations were not shared with

the IESC (measured bi-annually with results expected after the time of this report); however, as no improvements were made on the Grand Canal since the last site visit, it is unlikely the metal concentrations have improved (in particular iron concentration).

The November 2023 site visit report mentions the sampling point 'Club Nautique' results (dated 20th November 2023) show a total iron content higher than the limit, where results communicated for other outlets (101, 104 and 102) are compliant. The metals concentrations were not provided for the 'Club Nautique' in May 2024, where other parameters are compliant.

To lower the surface water sediment content to an acceptable level, CBG must continue its efforts to reduce the overall emissions of dust at the Kamsar site, in accordance with the air quality requirements (see section 8.5) and improve management of surface water runoff through the installation of sediment traps prior to discharge of surface waters to the sea. During the May 2024 site visit, CBG representative mentioned that 2 technical solutions (from Golder and SRK) for the removal of the sediments in the Grand Canal are under review. CBG plans to install the sediment technical solution concurrently to the Grand Canal rehabilitation (see below), which timeframe is 2025.

One set of surface water results (at all monitored locations in Kamsar), dated March 2024, was provided following the May 2024 site visit and show compliant surface water and sediment concentrations. The IESC does however note that monitoring of surface water quality is performed at only 4 discharge locations and it was understood that a redesign of the Kamsar surface water drainage system would include in the consolidation of surface water channels, resulting in a single (or limited number of) discharge point(s) and a form of treatment facility. The redesign has not taken place and multiple (12) surface water discharge points remain in use. Given the delay in redesigning the system, the IESC repeats an earlier recommendation to extend the monitoring programme to include, at a minimum, periodic visual inspect of surface water discharges for all locations. The installation of simple sediment traps and oil water separators should also be evaluated.

Grand Canal rehabilitation

The 'grand canal' (which collects most of the surface water from the Kamsar site), shows signs of aging and needs to be rehabilitated. The November 2023 site visit report mentioned that the technical specifications and plans for the canal rehabilitation were finalized. CBG is now looking for the company which will perform the rehabilitation.

No timeline for the Grand Canal rehabilitation was communicated, but CBG estimates it is unlikely to happen before 2025. It is recommended that a clear timebound plan be developed and the timeframes fed into a revised forecast and communicated to Lenders.

Surface water drainage capacity

The Water Management Plan (WMP) includes an action to investigate drainage capacity at the Kamsar site. The action stems from studies conducted during the preparation of the WMP that indicate many drains and sediment traps do not have the capacity to meet a 1 in a 100-year 24 hours rainfall event following an expansion of the surface water drainage network associated with the construction of the Phase 1 Expansion Project.

A number of preliminary designs were shared with the IESC, however these have been dismissed by CBG. Consequently, CBG engineering team revisited the drainage design following the IESC's December 2022 site visit and determined that only 1 drain must be upgraded to meet the required capacity for a Probable Maximum Precipitation (PMP) event of 1:50-year flood event.

The works on the drains upgrade were ongoing at the time of the site visit (reported to be 60 % completed), with the works finalization planned for end of May 2024.

8.3.3 Kamsar plant water usage and industrial wastewater treatment

Performance Standard 3: Water consumption and industrial wastewater treatment in Kamsar	
Associated open finding(s)	New: N/A Legacy: N/A

Oil/Water Separator at the industrial wastewater outlet

The installation of a Dissolved Air Flotation (DAF) system in early 2023 at the 'main OWS' sampling point (IND 101) has significantly reduced concentrations of oil in water discharged via the industrial wastewater outfall. In September 2023, CBG proposed to use the DAF unit as the permanent wastewater (oil) treatment solution and Lenders gave their consent.

Out of the 4 monitoring results shared for IND101, dated 5th, 12th, 19th and 25th of March, only one exceeds the IFC threshold of 10 mg/L for oils and fats by 0.5 mg/L and doesn't present a material non-compliance, however the IESC will continue to request for the monitoring results at the IND 101 as part of the site visit documents review. For the record, the IESC requests CBG to provide all environmental monitoring data gathered the month before the site visit.

CBG intends to procure a second DAF unit to further ensure backup treatment to meet the applicable standard at all times. No timeline has been given for the backup DAF unit. The IESC recommends a realistic timeframe be set to ensure continued compliance in the event that the current DAF unit should fail or requires planned shutdown for maintenance purposes.

Water usage and industrial wastewater reuse

The IESC made a finding during the June 2023 site visit regarding water usage at the Kamsar plant, advising CBG to install water meters at the main contributors to wastewater production, specifically the locomotive cleaning station and the power station. During the May 2024 site visit, the IESC and CBG discussed this topic within the context of the Resource Use and Energy Efficiency Management Plan (RUEEMP). CBG reported that up to 70 % of the water produced for the Kamsar plant's usage is diverted from the CBG network and used illegally by some households or businesses in Kamsar; out of the 15,000 m³/d produced, only 4,200 m³/d is used by CBG. The consequence of such a situation is that CBG's 'cité' (workers' accommodations) experiences restricted water access – at the time of the site visit, the 'cité' (housing around 2,000 people) had water for only 2 hours per day. CBG mentioned its water treatment plants were barely enough to sustain CBG's operation in Kamsar and by a matter of fact had developed water saving strategies at its plant (for instance the closed water loop for the dust management). In this context, the IESC closes its finding made in June 2023, but will continue to challenge CBG on its water saving strategies, mainly following the review of the Resource Use and Energy Efficiency Management Plan (RUEEMP), proposed December 2024 (in the latest version of the updated ESAP not yet approved by the Lenders).

8.3.4 Surface water management at CBG site in Sangarédi

Performance Standard 3: Surface water management at CBG site in Sangarédi	
Associated open finding(s)	New: May 2024_EN_005 (mentioned in PS1) Legacy: N/A

The November 2023 site visit report highlighted that mining in general and other anthropogenic activities can adversely affect water quality in regional rivers and streams, cause elevated sediment

content and increase siltation of water bodies (leading to the reduction in water volume during dry periods and an excess of water in rivers during wet periods).

At the mine, the removal of the vegetation (stripping) associated with the mining activity causes the production of sediments which, if not managed properly, pollute surrounding surface waters during rainy events. CBG mentioned the surface water sampling results in the vicinity of Sangarédi shows high turbidity levels in surface waters despite the presence of sedimentation basins on site.

According to the EMoP, CBG performs monitoring for mining effluents at three locations. Results for only one location (MIN206) were shared with the IESC following the May 2024 site visit, although all three locations are reportedly measured weekly by CBG, and metals concentrations measured twice a year. The results shared are all compliant. Out of the 16 locations where surface water and sediments are monitored, results were shared only for 2 locations following the May site visit as the streams had run dry during the dry season. These results (dated March 2024) show non-compliance levels of Chromium in surface water at 2 locations, however not in areas where CBG directly operates. The sediment samples at the same location are compliant with applicable standards.

In the site assessment conducted in November 2023, CBG presented an infrastructure devoted to surface water management on the Kagnaka plateau which plans to be mined in Q1 2024. This infrastructure was comprised of a series of five sedimentation basins, in which water flows successively through a geotextile, before being discharge into the environment. According to a CBG representative, the design of the basins was carried out internally. This initiative marks the first time CBG has installed such a multi sedimentation basins, and an improvement from the existing single sedimentation basin present on operating plateaus.

During the May 2024 site visit, the IESC’s Biodiversity expert went back to the Kagnaka plateau and was told that the sedimentation basins were not operating as planned as water was bypassing the basins. The IESC has requested to see the latest map of the sedimentation basins, however that wasn’t provided. In addition, very few surface water and mining effluents results were shared by CBG following the site visit due to the lack of water during the rainy season (see earlier in this section). In this context, the IESC is unable to assess the efficacy of surface water management and treatment at the CBG site, as well as its ability to reduce suspended solids in the surrounding surface waters.

Currently, the EMoP doesn’t list the new basins’ outlet for the water quality monitoring. As CBG mining activities grow on other plateaus, the EMoP should be amended to include new measurement locations.

8.3.5 Communities’ water resources

Performance Standard 3: Communities’ water resources	
Associated open finding(s)	New: May 2024_EN_006 Legacy: June 2023_016, Dec 2022_032, Oct 2021_022, Nov 2023_EN_008, Nov 2023_EN_004.

Communities’ boreholes - General considerations

As described in the November 2023 site visit report, CBG provides the funds for the drinking water boreholes construction, and SNAPE (National Water Supply Point Management Services) builds the boreholes and performs boreholes maintenance and sensitisation of communities. In the 13 villages included in the CAO mediation, SNAPE performs routine borehole inspections and conduct water quality testing every three months. For these 13 villages, during the initial year of each borehole construction, CBG pays for any maintenance and replacement costs. After that, these communities

take ownership of the boreholes and cover the costs whenever maintenance is required. For the other villages (outside of the CAO engagement process), the communities take the ownership of the boreholes following their construction. Each community operates a dedicated bank account set aside specifically for borehole maintenance costs and in November 2023, SNAPE's representative assured that missed payments were virtually non-existent.

The December 2022 IESC site visit report mentions that CBG commissioned SNAPE to carry out a diagnostic visit and assessment of water needs in villages near the mine. SNAPE's resulting report, dated January 2022, was shared with the IESC in May 2024. The report mentions that communities expressed problems related to access to drinking water despite the efforts made by CBG, due to: i) The reduction of natural water sources, ii) The destruction of the environment through mining activities, iii) The drying up of boreholes, iv) The lack of maintenance of boreholes' iron removal devices. Furthermore, SNAPE's report states that 80% of the boreholes' pumps audited were out of order. The 2022 report concluded that the 'communities [...] have a problem with access to drinking water', and recommended to rehabilitate almost all boreholes audited, build new boreholes, and install iron removal devices at relevant boreholes.

Following SNAPE's diagnostic assessment recommendations, CBG performed multiple boreholes rehabilitation and construction (for more details refer to the November 2023 report). The collaboration between SNAPE and CBG highlights the significance of communication regarding borehole conditions and demonstrates that effective coordination between the two entities can result in tangible actions.

Therefore, the IESC reiterates its recommendation to CBG on the need for a strong liaison with, and to the extent possible influence over, SNAPE to be informed on the water quality and availability at the wells within the affected communities (for instance as part of the "Comité de gestion des forages" or boreholes committee). This could be achieved through a communication protocol with SNAPE regarding Communities' water resources monitoring and sharing of information. This will enhance CBG knowledge of the boreholes (water quality, quantity, condition etc.) and will allow for a prompt response from CBG in case communities face difficulties with their boreholes.

The Fassalywol stream case

The Fassalywol stream is impacted by siltation and the IESC has previously reported on high turbidity levels in the Fassalywol stream, originating from CBG's mining activities (Parawi stockpile), which is used for bathing and washing purposes by the village of Fassaly Foutabhé (approximately 1km downstream from the springs). To this date, attempts to reduce the turbidity levels through construction of settling ponds downstream of the Parawi stockpile have proved unsuccessful.

Since the November 2023 site visit, CBG has mandated specialists in February 2024 to determine the cause for the stream's high turbidity levels and propose corrective actions (following Alcoa's recommendation in June 2023). Their report mentions additional investigations (through the drill of boreholes) are required to determine mitigation actions. The IESC will follow up during the next site visit.

Drinking water at Fassaly Belendéré

In November 2023, the women of Fassaly Belendéré elaborated on the water challenges, noting that the boreholes tend to run dry in April and May (at the peak of the dry season). In May 2024, CBG indicated that the repairs to both boreholes were completed, ensuring water availability throughout the entire dry season for the village; however, no supporting documentation was provided to the IESC for verification. As previously reported, villagers find the taste of the water from the boreholes satisfactory; however, they observe sediment deposits at the bottom of their water containers after an overnight storage. The community relies on two boreholes, one

constructed in 2002 and another, financed by CBG, built in 2023. In November 2023, CBG representative mentioned neither CBG nor SNAPE monitor the water quality at the borehole.

As mentioned above and reported previously, it is critical CBG ensures strong liaison with SNAPE (the entity responsible for water quality monitoring) such that it is informed about the water quality and availability at the wells within the affected communities.

CBG drinking water treatment plants

CBG operates 3 water treatment plants for the supply of potable water: Cogon (Sangarédi), Batafong (Kamsar – Boké) and Songolon (Kamsar). These plants provide drinking water to the CBG “cités” (workers accommodations), and nearby communities. Cogon and Batafong plants use surface water (rivers) for their drinking water production, where Songolon plant uses groundwater.

The water monitoring results shared by CBG during the November 2023 site visit show high aluminium concentrations (higher than the WHO 0.1 mg/L limit) in the water produced by the Cogon and Batafong drinking water stations. Since the last site visit, CBG has continued its efforts to lower the aluminium content in the water produced at the Cogon plant and the aluminium results are all lower than 0.2 mg/L. Suez has assessed the Cogon station and suggested extra improvements to decrease aluminium levels in the water. However, a quote for these upgrades was not given. CBG has asked Suez to deliver this quote and will consider executing these enhancements based on their costs. In May 2024, the water results revealed a single non-compliant value for aluminium concentration at the Cogon station.

Other results shared following the May 2024 site visit indicated elevated levels of chlorides and/or residual chlorine in the drinking water from all stations. The IESC mandates that CBG investigate these concentrations to comply with the thresholds indicated in the EMoP.

8.3.6 Industrial wastewater at CBG site in Sangarédi

Associated open finding(s)	New: N/A Legacy: Nov 2023_EN_010
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Apart from the mining activities performed by CBG on various plateaux, other industrial operations are performed at CBG Sangarédi site: the Nitrokemine site and the vehicles workshop, the first is operated by Nitrokemine for the explosive manufacturing, the latter is operated by CBG. The industrial effluents of both sites are monitored through IND201 (vehicle workshop outlet), IND204, IND206, IND208, and IND209 (from Nitrokemine site) sampling points. Partial results were shared with the IESC following the November 2023 and the May 2024 site visits and are described below.

Vehicle workshop

November 2023 results showed non-compliant concentrations of Chromium and Iron at the vehicle workshop, and one measurement for oil and grease in March 2024 exceeds the allowed limit.

Nitrokemine site

December 2023 results showed concentrations of Chromium and Zinc higher than the allowed limits in some locations at the Nitrokemine site. In addition, the March results reveal two high conductivity value (no limit for conductivity in the EmoP) at IND206. Although these results for conductivity are difficult to explain without other results like nitrate concentrations (supposedly measured weekly), they might be related to the high metal concentrations at IND206. Indeed, the November 2023 results show high concentrations for: potassium total, sodium total, calcium total, magnesium total, manganese total, silicium total, lithium total, cobalt total, aluminium total, baryum total, stroatium total, tellurium total, silicium total, and lithium total. Although the site is operated by Nitrokemine, Nitrokemine is CBG’s contractor and the site is owned by CBG.

In the view of all these results, the IESC required CBG to investigate on the exceedances, mainly at IND201, IND206 and IND208, and undertake all necessary actions to reach compliance at these locations.

8.3.7 Groundwater: Recalibration of the Hydro/Groundwater Balance Model

Performance Standard 3: Groundwater: Recalibration of the Hydro/Groundwater Balance Model	
Associated open finding(s)	New: N/A Legacy: Nov 2023_EN_001

Mining activities have the potential to impact the proportion of infiltration versus surface runoff in the different watersheds. An increase in runoff and decrease in infiltration would negatively impact the water table and groundwater recharge. A water balance model simulating rainfall-runoff phenomena in Sangarédi Extension Area was developed and integrated into the WMP (dated 2018). The model described the hydrological processes in the different sub-watersheds, to estimate the short and long-term impacts of mining activities on infiltration versus surface runoff to eventually assess impact on groundwater table levels and water availability in rivers and head water springs to biodiversity and communities. The results from the flow into surface runoff indicated that the net effect of reductions in surface elevation and the hydraulic conductivity in the areas affected by the mining showed an increase in runoff, especially in peak flow.

The WMP mentions that groundwater data was required for the model to have two-dimensional groundwater flow, and for the model to be validated to ensure that a similar hydrological response is observed. This action was included in the WMP under "Recalibrate the Water Balance Model for Sangarédi based on the results of the pumping tests" (further subdivided into 5 actions). Following this step, the recharge of the water table and contribution the river base flow will be determined, and mitigation measures to ensure water availability to the communities and biodiversity will be implemented.

Since 2018, CBG has only performed the first sub-action which consist of the pumping tests (performed by Englobe in 2019) and was contracting SRK for the update of the model (second sub-action) at the time of the November 2023 site visit (ongoing since June 2023). In May 2024, SRK's purchase order was waiting to be signed by the General Director. Following the PO's signature, CBG foresees that a 6 to 7 months period will be required to perform the work.

As previously reported, this situation is leading to a delay in discussions concerning the execution of mitigation strategies to guarantee water availability for local communities and biodiversity and efforts should therefore be maintained. This topic will therefore remain under the IESC's high scrutiny.

8.3.8 Domestic wastewater quality

Performance Standard 3: Domestic wastewater quality	
Associated open finding(s)	New :N/A Legacy: Nov 2023_EN_009

Significant progress has been made regarding domestic wastewater management since the last site visit:

- Water quality assessments at the Kamsar and Sangarédi wastewater treatment plants (WWTPs) indicate compliance with applicable standards for all tested parameters, except for coliform counts in Sangarédi (see below). Notably, the Kamsar WWTP's ultraviolet (UV) treatment system has been highly effective, yielding a coliform count of 0 CFU/100mL at the discharge.
- Construction is progressing on the third treatment module at the Kamsar WWTP, expected to increase capacity by 1,200m³, with completion targeted for the end of the rainy season (November 2024).
- Installation of water meters at the outflows of both the Kamsar and Sangarédi WWTPs has been accomplished, effectively addressing and closing the previous finding.

The completion of the third treatment module at Kamsar significantly increases the WWTP capacity and will hopefully minimize the need for rain fed effluents to bypass the WWTP. Once construction of the third treatment module is complete, volumes of water will need to be monitored to confirm there is no discharge of untreated sewage water during normal operating conditions. The IESC will confirm the effectiveness of the third basin in subsequent monitoring visits.

Ultraviolet (UV) treatment system at the Sangarédi WWTP.

Previous monitoring reports informed that the treatment system in Kamsar showed insufficient capacity to treat the volumes of water received. The November 2024 monitoring report mentioned a replacement UV unit had been installed at the Sangarédi WWTP. However, the 3 results provided for coliforms show concentrations of 10 CFU/100mL, 1,210 CFU/100mL and 1,730 CFU/100mL on the 16th, 25th, and 21st March respectively. Thus, only one value is compliant with the allowed thresholds of 400 CFU/100mL.

The manager of the WWTP reported that the UV treatment process is disrupted by frequent power outages. Consequently, water bypasses the UV treatment stage and is discharged into the environment, resulting in elevated coliform levels at the outlet. During the site visit, discussions were underway to explore alternative solutions, including the implementation of solar panels to power the UV unit and maintain uninterrupted operation of the UV treatment system. Therefore, the IESC finding on this topic remains open.



Figure 8.2 The UV treatment at Sangarédi WWTP (under operation)

8.3.9 Sludge management

Performance Standard 3: Sludge management	
Associated open finding(s)	New: N/A Legacy: Nov 2023_EN_011

The sludges from the wastewater treatment plants (in Sangarédi and Kamsar) are dried then used at the site’s rehabilitation areas. In June 2023, the IESC recommended to develop a procedure for the disposal of the sludge. In November 2023, CBG shared that procedure with the IESC and the IESC required that the procedure specifically delineate the contaminant levels necessary for dried sludge to be repurposed in rehabilitation sites. These standards should align with the most stringent applicable regulations, or in the absence of such standards, they should reflect the best available practices. As of May 2024, CBG was still working on the procedure, and the IESC will follow up on this topic during the next site visit.

8.4 Waste Management

CBG operates waste facilities in Sangarédi and Kamsar. For the latter, two areas are used for waste storage: the Tora Bora site for domestic waste (primarily non-hazardous) and Kamsar hazardous waste site. In Sangarédi, the waste facility includes both hazardous and non-hazardous waste.

During the May 2024 site visit, the IESC has investigated the hazardous waste facility in Kamsar and in-person meetings were held with CBG environmental team on the update of the Waste Management Plan implementation.

The IESC has observed significant improvements in waste management practices over the past few years. Notably, these improvements are attributed to the establishment of the Tora Bora and Sangarédi waste segregation sites, as well as the construction of hazardous waste facilities.

8.4.1 Waste Management Plan - general update

Performance Standard 3: Status of other IESC findings made in the December 2022 monitoring report	
Associated open finding(s)	New: NA Legacy: Oct 2021_025, June 2023_020

CBG had continued progress in terms of execution of actions described in the Waste Management Action Plan as it can be seen on the graph below.

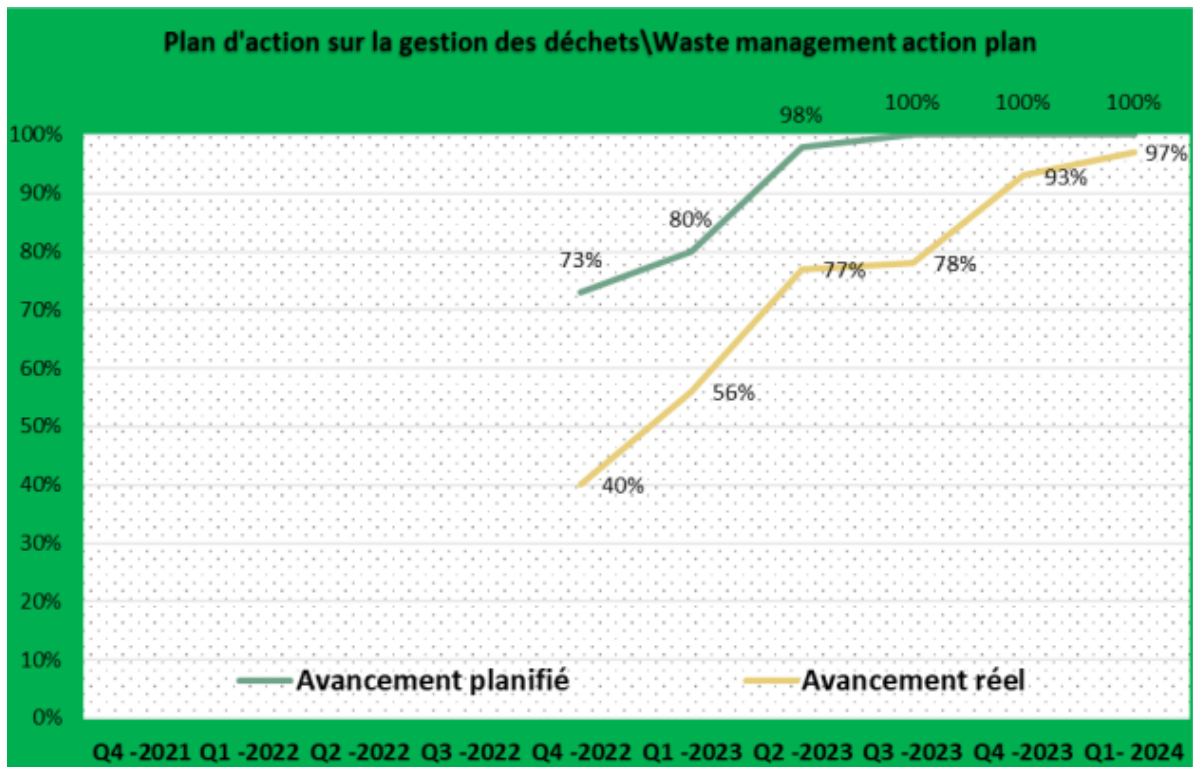


Figure 8.3: Status of Waste Management Action Plan implementation (as of May 2024)

Since November 2023, CBG has deployed waste segregation at the households in the CBG "cités" (workers accommodations) and continues domestic waste sorting at the Tora Bora and Sangarédi waste facilities, and public awareness campaigns and employees training on waste segregation.

As part of the application of the Waste Management Plan, CBG continues to focus on the following actions:

- Completion of Construction for Hazardous Waste Management Facilities in Kamsar and Sangarédi;
- Identifying companies for waste recovery (recycling, upcycling etc.);
- Investigating the scenarios for the removal of the Tora Bora historical waste dump.

Previous IESC reports have highlighted the need to revise the Waste Management Plan to reflect current thinking and strategy around waste management and the longer-term strategy. In November 2023, CBG informed that the update of the Waste Management Plan is almost completed, and a first draft for the updated Waste Management Plan will likely be available in the next couple of months. For the record, the deadline agreed with the Lenders for this item (as per the revised ESAP item #1) is 31st December 2024.

The Waste Management Committee (WMC) with a new structure since October 2022 comprises of members from HSECQ team, other CBG functions and includes the Operations Director. Part of the WMC's mandate is to produce a waste management policy that will be underpinned by a long-term waste strategy (noting the current waste management plan is limited to the short/mid-term). The long-term waste strategy is still awaited, and although CBG reported it will be ready by Q1 2024 in November 2023, it was not available in May 2024 at the time of the site visit.

8.4.2 Waste recovery

The National Directorate on Pollution, Nuisance, and Climate Change (DNPNC) audited CBG in February 2024, and following CBG's request, provided a list of companies performing waste recovery. CBG is in the process of evaluating the competency of specific waste management firms for the proper treatment and disposal of various waste categories. As part of this assessment, CBG will conduct audits on preselected companies to verify adherence to the Project's applicable standards.

8.4.3 Tora Bora historical waste dump

Prior to implementing waste segregation at the Tora Bora site, CBG disposed of waste without any sorting or treatment, which resulted in a gradual accumulation of waste. Recognizing the unsustainability of this situation and following the IESC recommendations, CBG upgraded its site to facilitate waste segregation and categorized storage. Subsequently, CBG collected historical waste to create a landfill (referred to as the historical waste dump) and took precautions by covering it with tarpaulins to mitigate fire risks.

Following the site visit in November 2023, CBG engaged a consultant to assess the feasibility of burying the historical waste dump (and present stored waste on Tora Bora facility). The consultant has prepared a report (not shared for IESC review). Additionally, CBG plans to commission another consultant to explore the viability of incineration as an alternative solution for managing the historical waste dump (and present stored waste on Tora Bora facility).



Figure 8.4 Historical waste dump in Kamsar

8.4.4 Kamsar – Ashes from domestic waste

Associated open finding(s)	New: N/A Legacy: June 2023_021
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In June 2023, the IESC was told by CBG team that the ashes resulting from the incineration of the domestic waste in Kamsar are considered non-hazardous and are reused in remediation activities, although the waste management plan mentions the ashes are considered hazardous waste. Moreover, the waste from which the ashes are produced are not currently listed in the existing domestic waste management procedure.

During the May 2024 site visit, CBG mentioned they will develop an incineration procedure as part of the updated Waste Management Plan’s release (deadline on 31st December 2024). The procedure will describe the type of waste incinerated (to ensure only non-hazardous waste is incinerated) and detail the periodic analysis of ash to be performed (including parameters and related thresholds) prior reuse.

8.4.5 Hazardous waste facilities

The IESC previously reported on the construction of dedicated hazardous waste facilities in Kamsar and Sangarédi. The Kamsar hazardous waste facility is finalized and was getting filled with hazardous waste at the time of the May 2024 site visit. The construction of the Sangarédi hazardous waste facility is planned to be completed in December 2024. In the meanwhile, hazardous materials are segregated and stored in containers.

8.5 Air Quality

A general status update against the air quality actions plans/key actions therein is provided below.

8.5.1 Status of AQMP and the AQ Memorandum update

The Air Quality Management Plan (AQMP) prepared in January 2019 did not specify stack emission criteria for the dryer stacks in Kamsar. An agreement was made between CBG and Policy Lenders to revise the AQMP based on stack emission limits that were to be derived and then agreed with the Policy Lenders (captured in the ESAP, Item#13). However, additional modelling has since demonstrated that reducing emissions from the dryer stacks in isolation would not result in the desired ambient air quality (AAQ) improvements. CBG has therefore adopted a more holistic approach to improving AAQ, in which the improved emissions from the dryers are just one component of the approach. The new "holistic" approach, including detailed actions aimed at improving overall air quality in the Kamsar area, has the support of the IESC and Policy Lenders.

The deadline for the production of the updated AQMP in line with the agreed holistic approach is the 31st of July 2024.

In the context of the AQMP update, one action was for CBG to request an agreement from Government of Guinea (GoG) to derogate from the national stack emission limits and adopt the IFC limits instead (as set in the IFC EHS 'Small Combustion Facilities Emissions Guidelines'). Indeed, the emission limits set by Guinean legislation were deemed too restrictive to be reached by CBG's facilities. CBG has obtained a letter from the GoG, dated 18 February 2024, giving acceptance on the new air stack emissions limits proposed by CBG for the generators and the boilers of Kamsar plant. The letter and its English translation have been shared with the IESC and the Lenders in March and April 2024. Discussions are ongoing between the IESC, the Policy Lenders and CBG on the emission limits to retain for the revised AQMP.

Otherwise, the improvements performed since November 2023 include, *inter alia*:

- Continued collaboration with KLN Industries (an engineering company) to address the findings of the Saacke external audit on the dryers;
- Installation of new conveyors with dust collectors and rehabilitation of the tower TA10, now equipped with two vacuums to capture dust emissions at the source (see details below);
- Repair of the PM₁₀ sensor at the Kamsar permanent station (Air Quality Monitoring Station – AQMS) in May 2024 and equipment for the fence line monitoring purchased.

As of May 2024, CBG considers that their overall progress on the air quality action plan is of 80 %.

8.5.2 Stack Emissions, Dust Suppression/minimisation, and update of the AQMP

Performance Standard 3: Stack Emissions, Dust Suppression/minimisation and update of the AQMP	
Associated open finding(s)	New: N/A Legacy: March 2022_015

This section aims at providing an update of the actions that are due or should be in progress as per the AQ Action Plan associated with the holistic approach.

Fugitive emissions: Facility Wide Housekeeping and maintenance

The maintenance actions aiming to decrease the fugitive emissions (mainly due to the dust emissions at the Kamsar site) defined by CBG in April 2023 are now included in CBG's routine

inspections and maintenance schedules, with satisfying results according to CBG. CBG is currently on track regarding this aspect at Kamsar plant. No update was provided for the Sangarédi mine site.

In January 2024, CBG took advantage of the Kamsar plant's 24 days shutdown to install two new conveyors (C8 and C12) as well as rehabilitating the TA10 tower and add new fugitive dust suppression and collection points. Dust is now collected at the end of the conveyors C8 and C12 (where it used to drop to the ground before the works), and tower TA10 is now equipped with two new vacuums to capture dust emissions at the source (arrival of the conveyor). As mentioned in section 7.3.1, dust has been considerably reduced in tower TA10 compared to the November 2023 visit.

Dust suppression system have also been installed at TA6 and TA7. Existing and new dust suppression points are located on Figure 8.5.



Figure 8.5: Location of existing (in green) and new (installed in January 2024, in blue) dust suppressing points at Kamsar Plant

CBG experiences low pressure issues and sediments load in the water used in the Kamsar dust management systems. CBG is still studying several options to remove the sediments from the water used in the dust suppression systems at the plant. CBG is exploring the dredging option and have removed 140,000 tons of sediments in January 2024 from the west lake/basin (bottom of the picture above), which water is used for dust management at the dryers.

Dryer 1,2,3 rehabilitation Project

KLN Industries have been engaged in the second semester of 2023 to address the findings of the Saacke dryer audit (through breaking down the action plan task by task). CBG performed the ongoing improvements completed since November 2023 at the dryers 1, 2 and 3 (to ensure air tightness at ovens entries/exits, in ducts and cyclones, reduce pumps' leaks etc.). This decreased fugitive dust emissions. Budget for future tasks is under ongoing discussion between CBG and KLN.

No update was provided regarding the repair of non-functioning automation instruments and reinforcement of the automation system with new instruments (along with the use of artificial intelligence to help manage the dryers), planned in 2025. These are part of the AQMP action plan, and aim to better operate parameters (e.g. combustion parameters) to ultimately lower the risk of exceedances in your stack emissions.

The shutdown of the dryers 2 and 3 to replace their combustion chambers is under discussion with the chambers’ provider, and CBG indicated that the replacements were still planned for 2025 (however not confirmed). The replacement of the combustion chambers is thought to further reduce the stack emissions from the dryers at Kamsar site.

Data collection for Dryer 4 CEMS

The Continuous Emission Monitoring System (CEMS) installed on dryer 4 still encounters technical issues with the sensors and is not working continuously. CBG planned the refurbishment of dryer 4 in May 2024, which is, according to CBG, the last opportunity to fix the CEMS. Suntech helps CBG troubleshoot the CEMS issues. If unsuccessful, CBG will look for another technology for the monitoring of the dryer’s outlet, but they indicated that they would have difficulty finding suppliers.

CAT audit - Power plant audit (generators)

Regarding the emissions of NO_x and SO_x, the main sources are the power stations stacks. CBG contacted Caterpillar to send a team to audit the generators at Kamsar and the audit was performed by MAK in July 2023. The aim of the audit was to produce an action plan to reduce NO_x and SO_x emissions from the power stations. CBG indicated they were not satisfied of the report, as according to them, it is providing for a quote and not for the expected action plan. The IESC understands CBG is now in dispute with Caterpillar to resolve the issue. CBG do not intend to share MAK’s report in its current form with the IESC or with the Lenders.

Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators located in the original Kamsar central powerhouse by 2020. CBG indicated these 8 old generators are “declassified” (however not decommissioned), however it was confirmed the old generators were no longer in use, nor maintained, and that their related operational tower has been dismantled. According to the information provided, CBG also operates in Sangarédi 3 generators (No. 4, 5 and 6) and 2 back-up generators (in N’Dangara and Cogon). The other ones in Sangarédi are “declassified”, waiting for repair or have been transferred to peripheral areas.

Model calibration

CBG has indicated they requested IEC to update the air dispersion model based on the last stack test results available (see section below on monitoring), and that the update is complete or at least close to completion, and mentioned the results will be shared with the IESC once available. The IESC will ask for update on these results on an ongoing basis and during the next site visit.

8.5.3 Air Quality Monitoring

Performance Standard 3: Air Quality Monitoring	
Associated open finding(s)	New: May 2024_EN_004 Legacy: Nov 2023_EN_007

Stack emission monitoring

Two stack emission campaigns were completed in 2023 for the dry and wet seasons, for the boilers and the generators. The dry season campaign included the monitoring of generators 13 and 14 and dryers 2 and 3 (not on dryer 1 as it was under commissioning), and the wet season campaign

was performed on dryers 1, 3 and 4 and generators 15 and 16. The boilers were not included in the 2023 monitoring campaigns, without any justification provided.

CBG is expecting to receive an aggregated stack emissions report for the year 2023, which will encompass data from both the dry and wet seasons, prepared by their consultant IEC. However, as of the reporting date, this document is not available, and the timeframe for its release remains unknown to CBG. Once available, CBG mentioned they will share it with the IESC. In addition, CBG has renewed IEC's contract for stack tests in 2024, however they indicated the dry season stack testing will be missed due to invoicing issues delay with IEC.

As a result, the IESC has not obtained stack monitoring reports since the year 2022. The only exception to this are some incomplete results shared during a presentation in the Air Quality site visit that occurred in July 2023. This situation has contributed to a data void exceeding a duration of two years.

The IESC understands that Alcoa support in the review of the stack design and rehabilitation (and overall improvement in air emissions) is ongoing.

Ambient air monitoring - Fixed station

The IESC previously reported malfunctioning equipment was preventing collection of ambient air quality data from the Kamsar air quality monitoring station. In December 2022, the IESC reported the repair made to particulates sensors, and the non-functioning of SO₂ and NO₂ equipment. Subsequent acquisition of new SO₂ and NO₂ sensors occurred in 2023. Progress was noted since the November 2023 visit, with the successful commissioning of the gas sensors (NO₂ and SO₂), resulting in data collection for several weeks until a power outage halted operations. CBG has indicated that a consultant will be engaged to resolve the issues with the gas monitoring equipment, although a specific timeline for this action is yet to be determined. Therefore, CBG is late on this item of the AQ action plan.

As previously reported, in August 2023, the sensors for PM₁₀, PM_{2.5} and PM_{total} stopped working. The PM_{2.5} and PM_{total} sensors were repaired in November 2023, and the PM₁₀ sensor had been repaired in May 2024. Therefore, the station now reportedly monitors all PM parameters (PM_{tot}, PM₁₀ and PM_{2.5}). However, the IESC asked for the PM_{2.5} and PM_{total} data available since November 2023, but this was not provided.

As such, only the PM_{2.5} and PM_{total} data were recorded at Kamsar fixed station since the start of 2024 and no data was shared for review.

Ambient air monitoring - Periodic monitoring

Ambient air monitoring is also conducted on a quarterly basis across a range of Project sites, including local communities around Kamsar and Sangarédi and areas along the railway, to measure concentrations of particulate matter (with portable equipment – MiniVols) and NO₂ and SO₂ (with passive samplers). This is consistent with the programme included in the EMoP. CBG's Annual Monitoring Report (AMR) for 2023 delineates the results for the year and attributes missing data to challenges in site accessibility and issues related to the transportation of samples. Additionally, results for the first 2024 monitoring campaign have been reported. A synopsis of these results is detailed in the subsequent tables.

The inconsistencies in sampling durations for NO₂ and SO₂ identified in the previous IESC monitoring report seem to have been corrected by CBG, although no further explanation was provided (typo corrections, malfunction of the timers etc.?). These corrections have eliminated outliers and exceedances of Ambient Air Quality Standards (AAQS) for NO₂ and SO₂ for 2023 results.

Table 8-1: Ambient air monitoring results – Year 2023

Compound	Period	Sampling duration	Concentrations in ambient air * (min – max, µg/m ³)			Ambient Air quality Standards (AAQS, µg/m ³)
			Sangarédi	Kamsar	Railway	
NO ₂	Year 2023	Kamsar and Railway: 6 to 34 days Sangarédi: 6 days	0.5 – 16.5	1.3 – 12.6	2.0 – 12.2	40 (annual average)
SO ₂	Sangarédi: 3 campaigns		0.3 – 2.4	0.06 – 1.9	0.06 – 2.6	50 (annual average) 125 (24hr)
TSP	Kamsar and Railway: 4 campaigns	24 hours	25 – 172	29 – 253	40 – 452	-
PM ₁₀			16 – 115	25 – 223	32 – 359	150 (24hr)
PM _{2.5}			8 – 55	20 – 125	15 – 198	75 (24hr)

In bold: value exceeding AAQS

* Excluding atypical values according to CBG.

Table 8-2: Ambient air monitoring results – January-May 2024

Compound	Period	Sampling duration	Concentrations in ambient air * (min – max, µg/m ³)		Ambient Air quality Standards (AAQS, µg/m ³)
			Sangarédi	Kamsar and Railway	
NO ₂	Sangarédi: 1 campaign (Feb-March 2024)	5 to 6 days	2.9 – 8.2	3.3 – 24.2	40 (annual average)
SO ₂			0.3 – 1.7	0.3 – 4.2	50 (annual average) 125 (24hr)
TSP	Kamsar and Railway: 1 campaign (Jan-Feb 2024)	24 hours	112 – 292	91 – 564	-
PM ₁₀			41 – 197	19 – 233	150 (24hr)
PM _{2.5}			31 – 105	21 – 59	75 (24hr)

In bold: value exceeding AAQS

* Excluding atypical values according to CBG.

Results available for NO₂ and SO₂ are all below the AAQS defined in the AQMP. Exceedances of AAQS for daily concentrations of PM₁₀ and PM_{2.5} have been observed. In 2023, these exceedances occurred solely in Kamsar and along the railway during the final campaign in December (dry season). In February 2024, exceedances for daily concentrations of PM₁₀ and/or PM_{2.5} were noted in the vicinity of Kamsar and Sangarédi. CBG's annual report for 2023 states, "Average particulate matter measurements show that concentrations are generally highest at the multi-user site, then gradually decrease in Kamsar and even more so in Sangarédi."

These PM exceedances cannot be interpreted based on 24-hours measurements every quarter without any meteorological data. As suggested in CBG's annual report for 2023, they may result from CBG activities but also from external dust sources (e.g., bush fires, wood-burning...). The MiniVol sampling (TSP, PM₁₀ and PM_{2.5}) is rather meant to compare/validate results of other monitoring methods (fixed station, fence line). Therefore, these results call for no further comment from the IESC. They will need to be consolidated and interpreted along with the results from the future continuous monitoring at the fixed station and the fence line monitoring.

To be noted that no results were provided for metals monitoring in ambient air for 2023 (partial results provided during the previous IESC monitoring).

Ambient air monitoring - Fence line monitoring

Regarding fence line monitoring, CBG has purchased the new equipment, including nine air sampling monitors and four mobile weather stations, which is not received yet. IEC will be in charge

of the commissioning. CBG plans to start the fence line monitoring in July 2024 around Kamsar and Sangarédi.

8.6 Noise and Vibration

8.6.1 Noise monitoring along the railway

Performance Standard 3: Noise monitoring along the railway	
Associated open finding(s)	New : N/A Legacy : June 2023_022, March 2021_027

Noise model update

In 2020, Englobe has performed noise studies along the railway to evaluate the impacts of the MUOA rail project from the initial phase (with 10 train/d), Phase 1 (30 trains/d), and Phase 2 (40 trains/d), on 3 types of zones: urban, rural, and semi-rural. Today, 12 to 15 trains are traveling on the railway. The results of Englobe’s study show that the noise is expected to meet the requirements during the phase 1 in all areas, while exceedances are expected during the Phase 2 in semi-rural and rural areas. The Englobe study also shows that minimum distance between the train tracks and the houses is 19 m in the rural area, 25 m in the rural and semi-rural areas for Phase 1.

One of the key recommendations made by the IESC related to the mapping of sensitive receptors in rural areas affected by the MUOA rail project, specifically those receptors identified within 50m of the railway that, based on predictive modelling, would potentially be impacted by noise and vibration from increased train movements in the future (Phase 2). Following this recommendation, additional 3 new sites have been identified along the MUOA corridor and are currently being monitored and added to the EmoP. New monitoring points were also added to the reviewed EmoP, where monitoring points for old plateaus were removed. The total number of monitoring points sum up to 30. In addition, the IESC was informed by CBG that reaching Phase 2 appears improbable; instead, it seems more likely that train frequency will align with the projections set for Phase 1.

The IESC also requested CBG to establish a robust noise baseline data set (before train numbers further increase) at locations where exceedances were expected from Englobe’s study’s results. This is currently ongoing.

Noise mitigation measures

The following activities will reduce the noise emissions along the railway line:

- The upgrade of the railway infrastructure performed by CRCC (new tracks are expected to lower noise emissions).
- As reported previously, CBG has started a reforestation pilot project (implying the environment and biodiversity teams) since June 2023 to investigate the most efficient type of trees to reduce the noise. Results from this project show the most promising tree is the Ficus binnendijki. CBG plans to implement the project at Teli Bofi along 2 km (PK112-PK114).

Results of monitoring campaigns

The results of noise monitoring campaign (taken at 21 locations in February and March 2023) at residential locations along the railway, in Sangarédi and Kamsar show many non-compliant noise values (8 during the day, and 13 during the night). The IESC reiterates its recommendation to CBG to investigate the contribution from CBG operations to these noise measurements (recognising

there are other sources of noise), develop a plan listing all sensitive receptors most impacted by CBG operations, investigate the efficiency of the mitigation measures implemented to date, and add mitigation measures if required.

8.6.2 Blasting noise and airblast overpressure monitoring.

Ground vibrations and airblast overpressure due to blasting activities are monitored by CBG and assessed against applicable project standards (AZNEC limits). All measurements (dated March and April 2024) shared with the IESC following the May 2024 site visit are compliant with the limits.

8.7 Dredging

Performance Standard 3: Dredging	
Associated open finding(s)	New: N/A Legacy: Oct 2021_012

The maintenance of the 'Petit Port' involves annual dredging activity, and additional dredging every three years. The dredged material is placed at zone A3, located around 10 km from the shore and CBG informed zone A4 will only be used when a major dredging will be performed.

Following the previous site visit in November 2023, no dredging activities were undertaken, however the IESC has requested that CBG furnish supplementary details to refresh the corresponding finding.

The Dredging Management Plan requires CBG to, among other things:

- Perform characterisation of benthos prior to dredging at both the dredging area and the disposal area; and
- Monitor underwater noise monitoring during the dredging campaign.

However, during the May 2024 site visit, CBG informed the IESC that the latest noise measures and benthos characterisation are dated 2022 and weren't measured in 2023, which doesn't comply with the DMP's requirements.

Two monitoring points for water quality and sediments are located at the Petit Port, and turbidity is measured throughout the dredging campaign, with measurements performed 100 m from the work location during dredging. Previous reported information on sediment monitoring is still applicable: *"The Dredging Management Plan requires turbidity to remain below 25 mg/L exceedance from the baseline value, but CBG exceeds this requirement at each dredging campaign and questions the relevance of this requirement in the Guinean context, as well as the distance of the monitoring from the dredging location. CBG plans to update the dredging management plan as part of the environmental plans' update and will investigate the applicable requirements then¹¹".*

8.8 Resource Use and Energy Efficiency

8.8.1 Update on the Resource Use and Energy Efficiency Management Plan (RUEEMP)

The Resource Use and Energy Efficiency Management Plan (RUEEMP) is primarily focused on: i) reducing water use; ii) reducing energy consumption; and iii) reducing GHG emissions.

CBG, following the 2014 ESIA study, developed all requisite ESMPs, including the RUEEMP, initially documented in English in 2019. In 2021, CBG undertook a review of the RUEEMP, subsequently

¹¹ The Dredging Management Plan will be reviewed by the IFC and Lenders in accordance with the Management of Change procedure.

generating a Procedure for GHG calculation and a Policy dated 2022 that delineates CBG's strategy concerning GHG emissions. The latter is accessible on the company's website and Sharepoint. Though the RUEEMP review was slated for 2022, it encountered delays and is now scheduled for completion in 2024 and will be sent to the Lenders for their approval.

During the May 2024 site visit, the IESC met with the Resource Use and Energy Efficiency Champion. He reported that, following the review of the RUEEMP, the Greenhouse Gases (GHG) calculation methodology has been updated to reflect the IESC's 2021 recommendations. The revised methodology and the identified sources of GHG emissions at CBG were presented during the visit and subsequently shared for the IESC's review post-visit.

8.8.2 GHG methodology

Associated open finding(s)	New : May 2024_EN_001 Legacy : N/A
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Following the IESC recommendation, CBG has normalized the fuel use/GHG emission (the tonnes CO2/unit of bauxite produced) in their GHG emissions reporting data. In addition, the percentage of humidity has been taken into account for the bauxite production unit (value of 3 %).

Moreover, the GHG emissions reporting data now include the different users of railway/consumption of electricity by communities in Kamsar and Sangarédi. The following improvements should be considered in relation to the methodology:

- To follows the GHG Protocol Corporate Standard (World Resources Institute and and the World Business Council for Sustainable Development), CBG should report biogenic emissions outside from the GHG emissions inventory, both in the methodology (different tabs) and in the sources inventory. Indeed, GHG reductions can only be based on the reduction of direct and indirect emissions, and not through biomass gain.
- CBG currently does not account for indirect emissions (scopes 2 + 3). However, it is probable that CBG's clients will request intensity values for the bauxite, which can be provided through the scope 2 calculation (imported electricity), and through some scope 3 categories (upstream emissions such as waste management, and capital goods such as machines, and downstream emissions through logistics (transportation), and the manufacturing processes of CBG's clients (aluminium parts)).

The IESC also makes the following recommendations:

- The fuel consumption for each user is not clearly assessed (in the Excel file "373_ENE_1302"). For exemple, CGB needs to explain if the 'tugboats' category includes the visiting vessels (e.g. dredgers). Indeed, these navigations have their own fuel source, and GHG emissions calculations should include this item.
- Some emission factors are outdated and should be updated with more recent emission factors for each type of fuel. For instance, the emission factors used for the hydrocarbons provide mainly from the 2006 report of GIEC (IPCC), where the last report (the Sixth Assessment Report - AR6) from the Intergovernmental Panel on Climate Change (IPCC) report (dated 2021-2022) provides updated emission factors (Table 10.8, chapter 10, 'transport'). Re-computation of former yearly reports can be conducted, to avoid having increase of GHG volumes only due to emission factors updates.
- The methodology doesn't provide the data source and the data uncertainty (for both the emission factors and the data collected).

8.9 Impact of climate change onto CBG's operations

Associated open finding(s)	New : May 2024_EN_003 Legacy : N/A
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So far, CBG has not accounted for the impact of climate change on their operations but rather the impact of CBG operations onto climate change. However, as the impact of climate change on industries' operations is expected to increase in the near future, the applicable standards incorporate this risk: IFC PS1 (Assessment and Management of Environmental and Social Risks and Impacts) requires the identification of risks and impacts associated with a changing climate and layout the details of the assignment in its associated Guidance note. The IESC therefore recommends CBG to undertake an assessment of its operational risks to climate change and its adaptation opportunities.

8.10 PS3 Open findings

8.10.1 PS3 High significance findings

Table 8-3: Summary of open high significance Findings, PS3

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Nov 2023_EN_001	Recalibration of the Hydro/Groundwater Balance Model	<p>The Water Management Plan includes the action "Recalibrate the Water Balance Model for Sangarédi based on the results of the pumping tests" (further subdivided into 5 actions).</p> <p>Since 2018, CBG has only performed the first sub-action which consist of the pumping tests (performed by Englobe in 2019) and was contracting SRK for the update of the model (second sub-action) at the time of the November 2023 site visit (ongoing since June 2023). The lack of progress would suggest the availability of a functioning/calibrated model has not been a priority for successive EMTLs, although ongoing appointment of a consultant indicates the intention to recalibrate the model remains.</p>	<p>The IESC recommends prompt contracting for the update of the model and avoid any delay in discussions concerning the execution of mitigation strategies to guarantee water availability for local communities and biodiversity.</p>	High	Open (maintained as 'high' until SRK will start working on the model).
Nov 2023_EN_014	Surface water discharge - Kamsar	<p>The drainage system for the surface water and stormwater at the Kamsar site showed high sediment and oil concentrations in the past.</p> <p>To resolve the issue CBG undertakes a few actions, among which the cleaning of the surface water drains on a regular basis. However, the IESC fears the cleaning activities would potentially resuspend settled</p>	<p>An engineering solution such as the installation of sediment traps at outlets must be found to effectively reduce the suspended sediments in the effluents.</p> <p>CBG should investigate cause of exceedances and put in corrective actions as a priority.</p>	High	Open

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		<p>sediments, thus not reducing the suspended sediments at the outlets.</p> <p>Despite CBG's efforts to maintain the drainage system, some measurements of suspended materials and iron content at the surface water monitoring points are higher than the limits specified in the EMoP.</p>			
June 2023_016	Communities' water resources	<p>During the June 2023 site visit, it was difficult for the CBG representatives to communicate on the exact number of boreholes funded by CBG. Moreover, as CBG is not responsible for their monitoring, the boreholes do not show on the monitoring map and their water quality results were not communicated.</p> <p>The results from SNAPE's study on water needs in 50 villages in the mine weren't shared with the IESC for review.</p>	<p>Although CBG is not responsible for maintenance of the boreholes, it is important CBG ensures strong liaison with SNAPE to be informed on the water quality at the boreholes within the affected communities (for instance as part of the "Comité de gestion des forages" or wells committee). This will enhance CBG knowledge of the boreholes (water quality, condition etc.) and will ensure a prompt response from CBG in case the boreholes do not operate as expected.</p> <p>CBG needs to develop a communication protocol with SNAPE regarding Communities' water resources monitoring.</p>	High	Open

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

8.10.2 PS3 Moderate significance findings

Table 8-4 Summary of open moderate significance Findings, PS3

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_EN_004	Air quality – Stack testing	The IESC has not been provided with stack test reports since 2022 (apart from some partial results presented through some slides during the Air Quality site visit in July 2023), i.e. a gap of data of more than 2 years. In 2023, no stack test was performed on the boilers without any justification.	Provide the missing stack test reports for 2022 and 2023. Provide justification for the selection of air emission sources subject to stack tests.	Moderate	Open (new)
Nov 2023_EN_004	Drinking water quality at Cogon and Batafong drinking water treatment stations	Water monitoring results shared by CBG during the November 2023 site visit show high aluminium concentrations in the water treated by the Cogon and Batafong drinking water stations. In August 2023, an audit was performed by an external consultant and resulted in an action plan aiming to bring the Cogon plant to compliance. The implementation of the action plan is currently ongoing.	Fully implement the recommendations from the external audit report relating to the Cogon treatment plant and monitor for any improvement. If corrective actions result in an improvement, apply these to the Batafong treatment plant where feasible.	Moderate	Open. Finding has been downgraded as improvements are ongoing and results show less non-compliances.
Nov 2023_EN_007	Air quality monitoring	Ensure prompt connection of installed equipment at the fixed station in Kamsar to allow collection of AAQ data.	For the fixed station in Kamsar: The IESC previously reported malfunctioning equipment was preventing collection of ambient air quality data from the Kamsar air quality monitoring station. There are no records of NO ₂ and SO ₂ for the entirety of 2023 and no records of PM _{2.5} and PM _{total} from August to November 2023. Furthermore, PM ₁₀ measurements were missing from August through to the conclusion of 2023. CBG expects the	Moderate	Open. No record for NO ₂ and SO ₂ for 2024 1st semester. PM10 are now missing from August 2023 through to May 2024. No date was provided for the full operation of the station.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
			station will be fully functioning at the start of 2024.		
June 2023_021	Waste management procedure	The domestic waste management procedure and the industrial waste management procedure (both dated April 2023) were shared by CBG and reviewed by the IESC following the June site visit. The IESC notices that the procedure is missing the waste management hierarchy chosen for each waste stream (reuse, recycling, elimination through for instance incineration), the location and method used for waste segregation, handling and elimination. Also, the procedure is missing links to other existing procedures relating to domestic waste (for instance on waste sorting, incineration process, ashes reuse etc.)	The domestic waste management procedure needs to include the waste management hierarchy chosen for each waste stream (reuse, recycling, elimination through for instance incineration), the location and method used for waste segregation, handling and elimination; and the link to existing procedures relating to domestic waste management. The waste incinerated will need to be identified in the domestic waste management procedure, as the ashes produced by the incineration are reused in remediation activities. Furthermore periodic analysis of ash is required to confirm its suitability for reuse	Moderate	Open
March 2022_015	Air Quality – fugitive dust emissions	An evaluation of dust suppressants has been ongoing for several months. Dust generating activities are an inherent issue for CBG’s activities both at the mine and port locations.	CBG should expedite studies into the use of commercial dust suppressants and explore opportunities to use these and other techniques to further reduce fugitive dust emissions including: application of dust suppressants at Kamsar evaluated following completion of the ongoing dust suppressant study	Moderate	Open (efforts to reduce fugitive emissions ongoing. If use of chemical dust suppressants is no longer under consideration, the IESC should be informed such that this findings can be amended accordingly)
Nov 2023_EN_009	Sangarédi WWTP	Since the last site visit in June 2023, a replacement UV unit has been installed at the Sangarédi WWTP, however coliforms are still being detected.	Performance of the UV treatment plant should be investigated and optimised (as is the current CBG intention).	Moderate	Open

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
June 2023_022	Noise at sensitive locations	The results of noise monitoring campaign at some residential locations along the railway, in Sangarédi and Kamsar show non-compliant noise values.	In the view of these results, the IESC recommends CBG to investigate the part of CBG operations in these noise measurements, develop a plan listing all sensitive receptors most impacted by CBG operations, investigate the efficiency of the mitigation measures implemented to date, and add mitigation measures if required.	Moderate	Open
Dec 2022_032	Drinking water quality at Fassaly Foutabhé	<p>Community members have complained that water from wells fitted with iron removal devices is not potable. Visual inspection of one well supports the complaint.</p> <p>Community members also claimed that minutes of meetings had not been shared (a claim disputed by CBG).</p> <p>The stream at Fassaly Foutabhé continues to be highly turbid during the wet season/periods of rainfall (see issue Oct 2021_022).</p>	<p>CBG should prioritise close liaison with the community and SNAPE during further investigations and remedial works. CBG technical representatives should be present when SNAPE undertakes maintenance/repair or sampling from wells in Fassaly Foutabhé and ultimately ensures that the mine-affected communities (including others impacted by CBG's operations) have access to clean water. CBG should also use its best endeavours to ensure results of the water quality monitoring are shared by SNAPE with community members.</p> <p>The means for dissemination and posting of minutes should be clearly communicated and all minutes/records of dissemination should be carefully filed so they can be made available to interested parties upon request.</p>	Moderate	Open. The IESC has been informed by CBG that water quality results have since been shared with the community. The other points in this findings are addressed in finding Oct 2021_022. The finding has been downgraded and will be closed when minutes of meeting with the Fassaly Foutabhé will be communicated.
Oct 2021_012	Dredging	Stricter adherence with all the applicable requirements of the DMP is required in	The 2021 dredging campaign did not strictly adhere to certain actions set out in the Dredge Management Plan. In	Moderate	Open. Will be increased in significance if no improvement is noticed during the next site visit.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		<p>order to confirm impacts from dredging are known and minimised. Specifically:</p> <ul style="list-style-type: none"> - characterization of sediment from the dredging area and disposal area; - characterization of the benthic fauna from the dredging area and disposal area; and - underwater noise monitoring. <p>The DMP to be reviewed in line with the periodic management plan review cycle ahead of the next dredging campaign.</p>	<p>particular, deficiencies were observed in terms of:</p> <ul style="list-style-type: none"> - characterization of sediment from the dredging area and disposal area; - characterization of the benthic fauna from the dredging area and disposal area; and - underwater noise monitoring. <p>The IESC understands new contracts with external laboratories and an ongoing marine survey will allow the deficiencies to be addressed in time for any further dredging campaigns.</p>		
Oct 2021_022	Water quality - mine effluents	A spring used by Fassaly Foutabhé community members appears to have been adversely affected by CBG's mining activities.	CBG should investigate the causes of the contamination and, if found to be a result of CBG's activities, implement corrective measures to restore the quality of the spring water or ensure a replacement water supply for Fassaly Foutabhé in the event the spring water quality cannot be restored.	Moderate	Open. Actions are ongoing.
Oct 2021_025	Waste management	<p>Progress in the implementation of the waste Management Action Plan continues with a significant number of actions no longer relevant or behind the original schedule specified in the action plan.</p> <p>Community attitudes towards CBG's use of Bendougou have not been evaluated by the CBG CR team. The level of risk of community objections/blockades, similar</p>	<p>As reported previously, the Waste Management Plan should be updated to reflect CBG's current waste management strategy, including the potential use of Bendougou facility and longer-term strategy following end of the Tora Bora waste facility's design life.</p> <p>Also, the CR team to engage with the affected community members prior transportation of wastes to Bendougou.</p>	Moderate	Open (a revised version is near finalization)

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		to those that occurred in the past, is therefore unknown.			
March 2021_027	N&V impacts – rural areas adjacent to railway	<p>To date CBG has not specified feasible mitigation measures that could be implemented in the event noise standards are exceeded following the increase in ore transported by rail.</p> <p>A final solution could involve resettlement of affected parties. CBG should ensure alternative mitigation measures are identified to avoid resettlement.</p>	<p>The IESC recommends the following actions are completed:</p> <ul style="list-style-type: none"> • Confirmation of the location of sensitive rural receptors and distances from the railway line; • Establishment of a robust baseline N&V data set (before train numbers further increase); and <p>Identification of site-specific feasible mitigation measures in the event they should be needed i.e. availability of space and attitude of potentially affected parties to barriers/other measures). This is likely to be limited to installation of noise barriers and as such will need the involvement of the CR team in community consultations.</p>	Moderate	Open. Data collection for the baseline is ongoing.

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

8.10.3 PS3 Minor significance findings

Table 8-5 Summary of open minor significance Findings, PS3

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_EN_001	Energy efficiency/GHG emissions	Following the IESC recommendation, CBG has improved its GHG reporting methodology and data. However further improvements are required.	<p>The following improvements to be considered in relation to the methodology:</p> <ul style="list-style-type: none"> • CBG should report biogenic emissions outside from the GHG emissions inventory, both in the methodology (different tabs) and in the sources inventory. • CBG currently does not account for indirect emissions (scope 2 + 3). However it is probable that CBG’s clients will request intensity values for the bauxite, which can be provided through the scope 2 calculation (imported electricity), and through some scope 3 categories (upstream emissions). • The fuel consumption for each user is not clearly assessed (in the Excel file “373_ENE_1302”). E.g. CGB needs to explain if the ‘tugboats’ category includes the visiting vessels. • Some emission factors are outdated and should be updated with more recent emission factors for each type of fuel. • The methodology doesn’t provide the data source and the data uncertainty (for both the emission factors and the data collected). 	Minor	Open (new)

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_EN_003	Impact of climate change onto CBG's operations	So far, CBG has not counted for the impact of climate change on their operations but rather the impact of CBG operations onto climate change. However, as the impact of climate change on industries' operations is expected to increase in the near future, the applicable standards incorporate this risk: IFC PS1 (Assessment and Management of Environmental and Social Risks and Impacts) requires the identification of risks and impacts associated with a changing climate and layout the details of the assignment in its associated Guidance note.	The IESC therefore recommends CBG to undertake an assessment of its operational risks to climate change and its adaptation opportunities.	Minor	Open (new)
May 2024_EN_006	Drinking water from CBG stations	Other results shared following the May 2024 site visit indicated elevated levels of chlorides and/or residual chlorine in the drinking water from all stations.	The IESC mandates that CBG investigate these concentrations to comply with the thresholds indicated in the EMoP.	Minor	Open (new)
Nov 2023_EN_008	Drinking water at Fassaly Belendéré	The women in Fassaly Belendéré elaborated on the water challenges, noting that the boreholes tend to run dry in April and May (at the peak of the dry season).	The IESC recommends CBG to investigate jointly with SNAPE on the water shortages at Fassaly Belendéré and provide water to the community in case of foreseen shortages, while investigation on the cause of the water shortages is ongoing	Minor	Open. According to CBG representatives, both boreholes at Fassaly Belendéré were repaired, and the village has access to water through dry seasons. This item will be closed when evidence will be shared.
Nov 2023_EN_010	Industrial effluent compliance - Sangarédi	The industrial effluent monitoring shows high levels of chromium at 3 sampling locations out of 5 in Sangarédi. One sampling location shows high levels of	The IESC recommends CBG to investigate on the exceedances in heavy metal concentrations at locations in Sangarédi exceeding the thresholds, and if relevant improve its pollution prevention measures.	Minor	Open At the vehicle workshop, in March 2024, one measurement for oil and grease exceeds the allowed limit.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		iron, and another location shows high levels of zinc and suspended materials.			The IESC required CBG to investigate on the exceedances, mainly at IND201, IND206 and IND208, and undertake all necessary actions to reach compliance at these locations.
Nov 2023_EN_011	Sludge management	CBG developed the sludge management procedure, however, the IESC notes that the procedure doesn't include criteria to be met by the dried sludge in order for it to be reused in rehabilitation areas.	The IESC recommends CBG to inform, based best available practices or applicable standards (whichever standard is more stringent), the criteria to be met by the dried sludge to be reused in rehabilitation areas.	Minor	Open
June 2023_020	Waste management hierarchy	During the site visit, the CBG team has shown the plastic-based bricks produced from plastic wastes. Although the IESC encourages CBG to further investigate recycling and reuse opportunities, it must be reminded here that waste production prevention comes first in the waste management hierarchy.	For plastic waste, it is therefore suggested that CBG substitutes single use plastics (i.e. plastic bottles) by solutions generating lower waste volumes (i.e. water fountains).	Minor	Open
Dec 2022_031	Surface drainage, Kamsar	Preliminary surface drainage designs have either been rejected or misplaced. The planned upgrade of the surface water drainage system is well behind schedule and at risk of not being completed by January 2024.	A timebound plan should be developed and the timeframes are fed into a revised Water Management Action Plan forecast, such that any slippage (if applicable) beyond January 2024 is known and communicated to Lenders.	Minor	Open. The works on the drains upgrade were ongoing at the time of the site visit (reported to be 60% completed), with the works finalization planned for end of May 2024. Thus the finding significance is lowered to Minor.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Oct 2021_026	Hazardous materials management	Radioactive lightning rods are present on CBG facilities. These are prone to decay and damage over time and therefore need to be carefully managed. Currently CBG's plan for ultimate dismantling and disposal of these radioactive sources is undefined.	A longer-term solution for the safe dismantling and disposal of radioactive lightning rods is required as per action 4.18 of the HAZMAT Action Plan. The Waste Management Plan will also require update to include the disposal route(s) for this waste.	Minor	Open. CBG is in the process of evaluating the competency of specific waste management firms for the proper treatment and disposal of the waste.

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

9. PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY, AND SECURITY

9.1 Communicable Disease Prevention

According to the material shared for review, progress made in relation to the malaria and HIV/AIDS programmes is reported in the following sections.

9.1.1 Malaria

Performance Standard 4: Communicable Disease Prevention - Malaria	
Associated open finding(s)	New: NA Legacy: Dec 2022_035

Two NGOs have been appointed to carry on the malaria programme, as mentioned in the November 2023 monitoring report. Specifically:

- FMG performed a study on the knowledge, practices and skills of communities on malaria in the localities of Sangaredi, Kamsar and Daramagnaki among 1,241 households and 9 health structures. A report was delivered in April 2024, and disclosure of the results of the study with stakeholders took place on 24th of April 2024 in Kamsar.
- CEFACAM: no further updates received and what reported in the previous monitoring report remains valid¹²..

The IESC understands that activities relative to the Malaria Programme have started in May 2023, however, an overall planning of the activities has not been provided and the timing of activities and the programme’s end date are unclear. Therefore, the finding on this aspect remain open.

Figure 9.1: Malaria Programme 's photos



9.1.2 HIV and AIDS

Performance Standard 4: Communicable Disease Prevention - HIV and AIDS	
Associated open finding(s)	New: NA Legacy: Dec 2022_036

¹² As reported in the previous report, the programme on awareness-raising and distribution of treated-mosquito nets has been launched in Kamsar, Sangarédi and Daramagnaki communities and in public health facilities. 13,277 people were sensitized in malaria prevention, including 5 % pregnant women and 8 % children under the age of 5, and more than 3,000 mosquito nets have been distributed.

The HIV and AIDS programme was launched in August 2023 in Kamsar, as mentioned in the previous monitoring report. The material shared for review following the May 2024 site visit refers to the activities undertaken in Q3 and Q4 2023.

The documentation shows that the programme has been implemented in Kamsar, Kolaboui, Boké, Sangaredi and Daramagnaki. Between Q3 and Q4 2023, the percentage of people sensitised and the people screened have increased by 57 % and by 42 % respectively. Therefore, CBG has increased considerably the programme coverage in just three months. In schools the programme has been also carried out, completing 100 % of the target. Therefore, the IESC understands that the HIV and AIDS programme activities have been completed and reached the different levels targeted, including villages, market, bus station, mosque, workshop, fishing port, schools, etc. Moreover, additional areas were covered by the awareness raising programme, reaching out more people than initially planned and expected. Forty Peer Educators have also been trained, including 18 women and 32 health workers, to which 23 were women, which also covers more than initially planned.

It is understood the programme will continue in 2024 even though a planning of the upcoming activities was not made available for review. Therefore, the finding on this remains open and the IESC will continue to monitor its implementation.



Figure 9.2: - HIV and AIDS programme implementation

9.2 Community drinking water

Further details on community’s water resources (usage, quality etc) are provided in section 8.3.4.

9.3 Rail and Community Health and Safety

Performance Standard 4: Rail and Community Health and Safety	
Associated open finding(s)	New: May 2024_SO_004 Legacy: Nov 2023_SO_006, June 2023_025, June 2023_026, Dec 2022_037, Dec 2022_038, March 2022_025

As per the material shared for review, it is understood that CBG is monitoring the implementation of the Road and Rail Safety Management Plan (RRSMP) and the Transitional Measures Plan (TMP).

Community awareness campaigns on railway safety operations and the related risks and impacts were conducted on the issue of railway safety in 2023, with 10 community meetings organized in the fourth quarter of 2023, as reported in the Q4-2023 Borrower E&S Certificate.

According to the Q1-2024 Borrower E&S Certificate and the last information shared by CBG, during the first quarter of 2024, 9 community awareness meetings on railway safety were held, including a meeting with the sub-prefect of Kamsar. However, the IESC understood through the discussion held in May 2024 that the appointment of CEFAD for the implementation of this campaign has encountered resistance from the Sub-Prefect of Kamsar, who requested the selection of more local NGOs. A minute of meeting shared for review confirmed meeting with the Sub-Prefect in Jan 29, 2024 and aforementioned resistance. This action is therefore still on hold.

CBG has conducted 5 field visits as part of the railway safety in the fourth quarter of 2023 to validate the locations of community crossing points along the railway and for the installation of betafence, and in doing so, engaging with communities on their complaints relating to the adequacy of community mobility and rail crossing points.

Betafence installation started in May 2023 in Bilingual (at KP 89) through the appointment of 7 micro enterprises (TPEs). CBG planned to have all betafences installed by the end of Q1 2024; however, works in Kamsar and Kolaboui are still on hold pending local authorities' approval, according to the Q1 2024 Borrower Certificate. In addition, the Borrower Certificate informs that betafence installation in Bilingual is temporarily on hold pending completion of the compensation for cashew trees, although at the time of the May 2024 site visit compensation was reported as complete.

During the earlier November 2023 monitoring visit, a meeting with ANAIM confirmed commitment to collaboration between parties. A discussion was held to discuss options to further support betafence installation and has defined possible "normative" solution to support social acceptability (i.e. by requesting the establishment of a ministerial decision that would apply more stringent safety measures in large urban areas crossed by railways). However, during the May 2024 site visit, CBG informed of changes of relevant representatives at the governmental level (new Ministry of Mine), at local authorities' level, and within the ANAIM¹³. These changes have further delayed the decision-making progress on normative solutions to support communities' acceptance of betafence installation. During the May 2024 site visit, the IESC had the opportunity to visit the parking area in Kasty which CBG had built following request of the Authority in Kamsar, to provide parking for the trucks which were previously parked along the railway. The IESC is able to confirm completion of the parking area as reported in the Q1-2024 Borrower Certificate which is considered evidence of CBG's effort to address local authorities' requests to facilitate/progress with betafence installation.

The IESC has previously recommended that community sensitization continues and concerns around betafence installation be collected and appropriately addressed (for example, through the installation of additional manned pedestrian gates (portillons) to ensure safe crossings), which may further support social acceptability. Community sensitization has been ensured by means of meetings held on site and CBG plans to put *portillons* in specific places of the fence to facilitate access for disabled persons according to the material shared for review. The IESC notes it is also important that location of new *portillons* considers other vulnerable groups' opinions to verify any other relevant needs.

Even though it is understood that CBG is taking action on railway safety by means of community meetings on awareness raising and crossing points validation along the railway, livestock accidents still occur along the railway. Between Q4-2023 and Q1-2024, 3 additional livestock accidents have involved CBG's train, as logged in the Grievance Register after the complaints of two community members. One complainant reports two different accidents have occurred, where three animals

¹³ Agence Nationale d'Aménagement des Infrastructures Minières or National Mining Infrastructure Development Agency

died. The second complainant from Madina Toubata reports that in January 2024 one of his goats died. The IESC also understands that CBG has closed the first grievance, rejecting complainer’s request for compensation based on the Guinean Pastoral Code (based on the code CBG is not required to compensate for livestock accidents). The second grievance is still open, and no updates have been provided as follow-up.

The issue of compensation for livestock accidents remains open. The IESC has previously requested that CBG analyses the issue and discuss internally options and solutions, including the possibility to initiate a multi-user fund to be used as a compensatory measure as an alternative to the current management of these grievances. During the November 2023 site visit, CBG also reported intention to discuss this issue in coordination with its technical and legal department. The IESC could not discuss this matter further during the May 2024 site visit, but based on the material shared for review, the IESC understands that CBG deems the establishment of a multi-user fund unrealistic and likely to encourage false compensation claims. In addition, CBG has started rejecting communities’ request for compensation based on the Pastoral Code. The IESC still awaits evidence of a more structured approach to handle this issue - including awareness raising activities and regular disclosure of CBG’s procedure for the crossing of herds, installation of betafences where requested by communities, train driver sensitization etc. In case of confirmation of the application of the Guinean Pastoral Code, the IESC would request that CBG also detail the specific provisions of this Code applicable to these livestock accidents.

Material shared for review (covering the Q1 2024 period) does not report any major railway incidents involving communities, although the IESC notes incidents reporting presence of children along the railway (February 2024) and collision with a closed barrier at the Kolaboui crossing point in KP 31.2 by a motorcyclist (reportedly under the influence of alcohol).

Following the site visit (during the IESC reporting period), CBG informed the IESC of a serious incident on a section managed by CBG. Details of this incident are unclear at the time of reporting, however it remains clear that incidents, including near misses and serious accidents, continue to occur and efforts to fully implement to Road and Rail Safety Management Plan/seek ways to minimise the risk to community members remain essential.

9.4 Mining site and Community Health and Safety

Performance Standard 4: Mining site and Community Health and Safety	
Associated open finding(s)	New: May 2024_HS_006 Legacy: Nov 2023_SO_010

CBG reports that old roads at the intersections of the haul road have been closed by earth barriers in response to IESC’s observation recorded in November 2023. However, during the May 2024 site visit, the IESC continued to observe regular presence of civilians (pedestrians and vehicles) on haul roads mine, despite the presence of dedicated community roads built by CBG last year. Continuous efforts to discourage use of the mine haul roads is required.

During the May 2024 site visit, the IESC did not discuss further the fatality of an adolescent who drowned at the sedimentation basin (basin N°4) in May 2022. Nonetheless, the IESC had requested CBG provide some evidence of the communication sent to local authorities to warn of the young people of the dangers of swimming in the basin which had not been received. As part of the latest documentation shared for review for this report, CBG has shared an incident/accident report form, dated 27 May 2021 which warns about fatality risks due to the presence of young people swimming at the sedimentation basin N 7. The IESC understands this is a different basin than the one where the fatality occurred. Although this is evidence of the memo made on similar matters in the past, the IESC will require clarifications about the content (the incident/accident report only describes

presence of kids swimming at the basin and not any incident/accident occurred) and evidence of follow-up actions undertaken following the preparation of this report (including informing the city hall, preventing the use of the basin and awareness raising activities among the communities involving the authorities).

As reported in November 2023, CBG reported preparing an updated tracker for internal use which includes specific details on notification requirements, timeframes and internal reporting (as reported in the 'Deferred Remedial Action Plan - May 2022 incident' report). The document also mentions CBG was in the process of establishing a master Remedial Action Plan follow-up file to ensure consistent tracking and follow up of relevant incidents, including this incident. In addition to this, CBG committed to commission an independent audit in respect of all fatalities that have occurred within the Borrower's concession from 1 July 2021 to present, to be made available to the IESC and Lenders.

9.5 Blasting Protocol Implementation

Based on the review of the Borrower's E&S Certificate (Q4-2023) blasting has been discussed in the 17th and 18th CAO mediation sessions that took place from the 17 and 19 of October 2023 and from 5th to 7th of March 2024 respectively¹⁴. Among the blasting-related topics, the Borrower's E&S Certificate indicates that the blasting draft scoping report prepared by the blasting independent expert, Social Science Solutions' (SSS), is ongoing and is expected to be delayed as the Parties have concerns regarding the methodology proposed by SSS.

OHS aspects relating to blasting operations are covered in section 7.3.

9.6 Community Development

9.6.1 Updated Community Development Plan

The Community Development Plan (CDP) is currently under implementation. A short summary of the CDP summary, dated January 2024 (and update in July 2024), has also been disclosed on CBG's website¹⁵.

9.6.2 Implementation of the 2024 action plan.

Priorities for 2024 under the CDP relating to community health and safety include:

- Creation of 5 boreholes equipped with human-powered pumps in the villages of: Dassassa, Kegnenta, Dawafou, Taibata and Tinguilinta (CR Tanéné).
- Construction and equipment of a maternity ward at the Kolaboui health center.
- Renovation and equipment of the Balandougou health post center and construction of housing for nursing staff plus 1 latrine block with 2 cabins (CR Sangarédi).
- Construction and equipment of a health post plus 1 latrine block of 2 cabins and housing for nursing staff plus 1 latrine block of 2 cabins in the district of Sinthirou-Toumbé (CR Wendou Mbour).
- Construction and equipment of a health post plus 1 latrine block of 2 cabins and housing for nursing staff plus 1 latrine block of 2 cabins in Yaladané, district of Diandian (CR Daramagnaki).

Actual progress made on the aforementioned projects have not been discussed and will be further investigated, along with implementation of other aspects detailed in the Community Development Plan during the next monitoring visit.

¹⁴ The IESC is not directly involved in the CAO mediation process.

¹⁵ <http://cbg-guinee.com/les-communautés-locales/>

In relation to Phase 2 of the Income Generating Activities Support Projects or 'Projets d'Appui aux Activités Génératrices de Revenus' (PA-AGR), the consolidation phase is under progress in collaboration with CECI (Centre d'Etude et de Coopération Internationale), . Details of the groups trained and equipped in financial management to date have not been shared for review.

In regards of Local entrepreneurship, CBG reported that 1,811 people (amounting to 49 % of the total entrepreneurs), including subcontracting companies and TPE have received introductory training with a reinforced community safety component.

9.7 Influx Management

During the May 2024 monitoring visit, CBG has reported a 70 % of progress in the implementation of the Influx Management Plan, compared to planned 100 % originally expected by the end of 2022.

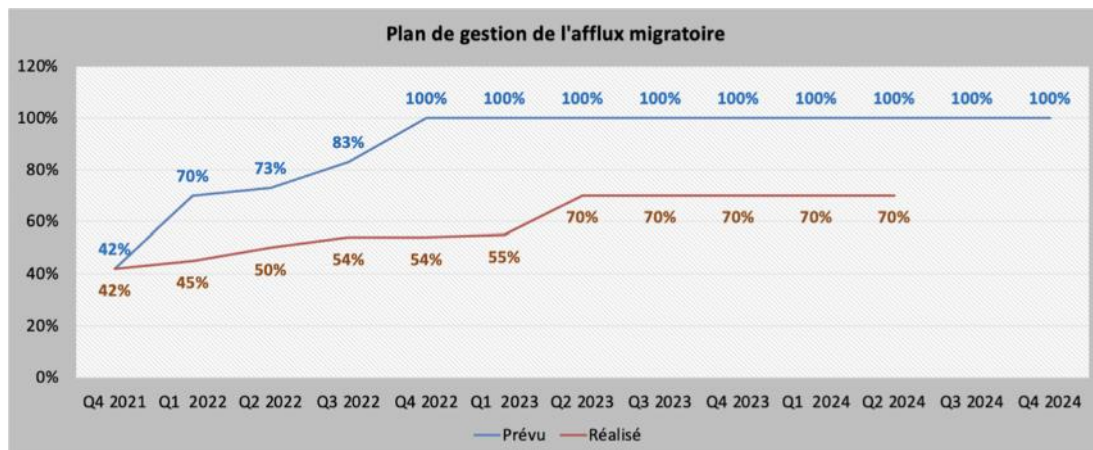


Figure 9.3: Influx Management Plan Action Plan Status as of May 2024 monitoring visit (13 of May 2024)

The delay is reportedly due to the acquisition of the satellite imagery of Kamsar and Sangarédi/South Cogon concession intended to determine the extent of urban sprawl and thus target interventions. This resulted in delays in subsequent actions that will be informed by the satellite imagery, including collection of information on the potential risks linked to the migratory influx in risk areas as part of the SEP, analysis of the newly occupied zones based on imagery (and field surveys), disclosure of the results of the analysis with the relevant stakeholders; and deployment of a training on Influx Management Plan to the CBG’s HSECQ team.

Preparation and finalization for the baseline study (and thus acquisition of satellite imagery) is the precondition for the implementation of the Influx Management Plan and the progress of all foreseen KPIs. To date, it is not possible to quantitatively assess the impact associated with influx and finalization of the baseline studies as well as the overall implementation of the Influx Management Plan are required as a matter of priority and delays should be minimized.

9.8 PS4 open findings

9.8.1 PS4 High open findings

Table 9-1: Summary of open high significance Findings, PS4

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Nov 2023_SO_010	Community Health and Safety – Mine site Safety	A fatality occurred on May 18th, 2022, in a sedimentation basin (reportedly N°4) at the Sangarédi mine site. This fatality was not reported to the IESC by CBG during the community health and safety sessions (held during each site visit). Following the site visit, CBG has shared the minutes of the meeting held after the fatality. No other documentation on the fatality was communicated to the IESC. On this occasion Lenders were not notified of the incident.	<p>Inspection programmes should be put in place to identify damage/vandalism of community safety measures e.g. installed fencing intended to restrict access to dangerous areas.</p> <p>CBG must inform the IESC of changes to the procedure following the drowning incident to ensure better communication of such event, and the measures should be put in place to ensure there are no repeated failures to notify Lenders when community incidents occur.</p>	High	Open (CBG has reported preparing an updated action tracker for internal use which includes specific details on notification requirements, timeframes and internal reporting however, to date, this has not shared with the IESC)

The 'closed' legacy findings from previous IESC monitoring visits are provided in [Appendix 2](#) of this report.

9.8.2 PS4 Moderate open findings

Table 9-2 Summary of open moderate significance findings, PS4

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Nov 2023_SO_006	Community Health and Safety - Railroad Safety	Pedestrians regularly cross the railway at informal locations, and crossings have been observed even when a train was approaching, and a flagman (Homme Piquet) was in proximity of the area.	Additional awareness raising to be provided to flagmen to ensure a stricter control over railway crossing, while training them on the appropriate ways to interact with communities and to ensure smooth community relations.	Moderate	Open (no specific evidence provided in order to confirm implementation of recommended action)
Dec 2022_037	Community Health and Safety - Railroad Safety	Betafences are now customs free and ready to be installed though new requests from local authorities now require prioritization of a truck "parking area".	Betafences installation to be installed as a priority	Moderate	Open (Betafence installation started; community acceptance has not been received in Kamsar and Kolaboui despite CBG's engagement efforts)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

9.8.3 PS4 Minor open findings

Table 9-3 Summary of open minor significance findings, PS4

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_SO_004	Community Health and Safety - Railroad Safety	Portillions installation need to consider disabled people and other vulnerable groups' opinions and needs.	The IESC will request evidence of engagements with disabled persons taking into account betafence installation progress. It is also important that location of new portillions considers other vulnerable groups' opinions so to verify any other relevant need.	Minor	Open. New finding. It is understood CBG has carried out community sensitization meetings to ensure safe crossing and installation of portillions, however, evidence is needed in order to ensure disabled persons and other vulnerable groups' needs and opinions are considered in the installation process.
June 2023_025	Community Health and Safety - Railroad Safety (livestock)	CBG's Engineering Work Order dated June 12, 2023 stating that CBG's CR team has been increasingly receiving doléances in relation to the installation of betafences to avoid loss of livestock that communities are experiencing along the railway in the area of Horé Lafou, Lafou Baila, Sakidjé, Parawol Malassi, Para, Correrah et Kalinco Pey.	In case betafence installation was feasible, specific engagements with the communities to verify their acceptability and absence of E&S impacts caused by the installation is required.	Minor	Open (while engagements with communities have occurred to discuss betafence installation, the IESC will follow the installation to check if community concerns in terms of E&S impacts subsequent to the installation are recorded and addressed by CBG. Item downgraded to Minor).
June 2023_026	Community Health and Safety - Railroad Safety (livestock)	CBG's Engineering Work Order dated June 12, 2023 stating that CBG's CR team has been increasingly receiving doléances in relation to the installation of betafences to avoid loss of livestock that communities are experiencing along the railway in the area of Horé Lafou, Lafou Baila, Sakidjé, Parawol Malassi, Para, Correrah et Kalinco Pey.	CBG to assess the need for initiation of a multi-user fund to be used as compensation measure (or find a different solution) as alternative approach to the current management of these grievances.	Minor	Open (The IESC still awaits evidence of a more structured approach to handle this issue - which continues to be recorded and may generate further tensions and frustration. In case of confirmation of the application of the Guinean Pastoral Code, the IESC would request that CBG also detail the specific provisions of this Code applicable to these livestock accidents.)

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Dec 2022_035	Communicable Disease Prevention - Malaria	Malaria programmes implementation still lags behind.	Malaria Programme to be developed as a priority	Minor	Open (Ongoing). (actions in progress, awaiting campaign completion)
Dec 2022_036	Communicable Disease Prevention - HIV/AIDS	HIV/AIDS programme implementation still lags behind. In addition, based on the ToR, each annual campaign will take place in the 4th quarter of the year, between November and December.	HIV/AIDS Programme to be developed as a priority. Particularly in 2023, CBG not to wait for Q4-2023 to start the campaign as per indication in the ToR.	Minor	Open (Ongoing) (actions in progress, increased number of activities undertaken vs planned, awaiting campaign implementation. Item downgraded.)
Dec 2022_038	Community Health and Safety - Railroad Safety (mobility)	Community concerns in relation to access to health centres, water planned to be managed via community development projects. Other criticisms exist on betafencing "dividing the city in 2 zones".	CBG to continue engaging local authorities and communities to manage expectations and mitigate potential opposition to betafencing and closely monitor the use of footbridges and acceptance by communities as the betafencing is erected. Attention to identify and record grievances concerning betafencing should be particularly paid.	Minor	Open (ongoing) (no update in May 2024 – previous update still valid: lack of betafence's approval in Kamsar and Kolaboui requires CBG to continue with engagement activities. The IESC will also monitor updates on "normative" solution as discussed between CBG and ANAIM.
March 2022_025	MUOA Project (mobility of PwD)	Use of stepped footbridges will prevent their use by people with physical disabilities. People unable to climb and descend steps will have to use level crossings.	Engage with communities to evaluate the number and residence of persons with reduced mobility (e.g. due to age or physical disability) that will not be able to use the footbridges. Explore mitigation measures to alleviate risk of pedestrian accidents, including physical	Minor	Open May 2024. It is understood CBG has carried out community sensitization meetings to ensure safe crossing and installation of portillions (gates), however, evidence is needed in order to ensure disabled persons and other vulnerable groups' needs and opinions are considered in the installation process.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
			separation of vehicles and pedestrians at level crossings.		

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report

10. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

10.1 Resolution of PS5 systemic issues

Performance Standard 5: Resolution of PS5 systemic issues	
Associated open finding(s)	New: May 2024_RE_006 Legacy: June 2023_029, June 2023_031, June 2023_042, Dec 2022_047

Following the resettlement workshop organized in Paris in December 2023 with CBG and the Lenders, several systemic issues have been resolved during the first five months of 2024:

- The Resettlement Policy Framework (RPF) was approved at the end of January 2024, and CBG has begun disseminating it among communities. Initial feedback has been positive, except regarding the principle of an optimum number of trees per surface area. CBG included this principle to curb land speculation, where owners plant so many trees that their survival or production levels were compromised. Such practice is an attempt from the Community to increase compensation, which was previously based solely on assets rather than land and assets.
- All the LRPs were approved by the Lenders in February 2024 (see section 10.3.1).
- CBG presented the status of rehabilitated land during the IESC May visit (see Section 10.7 in the PS5 Chapter and Section 11.6 in the PS6 chapter).

In addition, a way forward has also been approved through an action plan for the 2016-2023 PS5 non-compliant land acquisitions, due to the lack of land compensation or the failure to integrate the PAPs into an LRP (see Section 10.7).

Regarding other systemic issues:

- CBG is advancing the land tenure agenda for Hamdallaye and continuing efforts to make the Fassaly Fouthabé school functional (see Section 10.2.1).
- A monitoring and evaluation plan was presented during the IESC visit (see Section 10.8).

The cumulative impacts of CBG operating different Plateaus and/or other operations on the villages have finally started to emerge in discussions about the retrocession of land to communities and the Land Disturbance Permit process during the IESC visit in May 2024. Rehabilitation, retrocession of land, cumulative impacts, impact assessment in the LDP process LRP timing, and closing of an LDP are closely interrelated (see Section 6.6 in PS1 and Section 10.3.1 and 10.5 in PS5) and would probably need to be reassessed and addressed through a working group including a multidisciplinary team (mining, HSEC, legal).

The IESC recommended including the resettlement agenda in the roadmap and appointing a resettlement Champion and a Sponsor, as it is already done for key management plans. Although some significant progresses have been made on resettlement issues, the future Plateaus land acquisitions and the implementation of the Paris workshop action plan will require traction from different departments. Thus, the IESC maintains its recommendation. CBG indicated that the Resettlement Coordinator has been identified as the Champion and the Mine Manager as the Sponsor, but formal validation by the General Management is pending.

10.2 Hamdallaye and Fassaly Foutabhé RAP: Status, Assessment and Recommendations

10.2.1 Resettlement Physical Aspects

Performance Standard 5: Resettlement Physical Aspects	
Associated open finding(s)	New: May 2024_RE_001 Legacy: June 2023_031, June 2023_034, March 2022_032

CBG indicated during the November 2023 visit that there were plans for a RAP completion audit (for both Hamdallaye and Fassaly Foutabhé) in March 2024. However, the audit did not take place at that time and has since been rescheduled for the end 2024 (31st December) with lenders' agreement.

The objectives of the RAP completion audit are to:

- Open an official dialogue with both communities about the closing of the physical aspects of the RAP in a context where community members continue to ask CBG for repairs or work requests. The closing of the physical aspects of the RAP is also linked to the issue of security of tenure, described in detail below.
- Assess the livelihood restoration status, addressing the open finding that suggests additional food support in the absence of existing monitoring of PAP livelihoods.

Hamdallaye

As already highlighted in previous reports, the transfer of ownership of the Hamdallaye houses and the integration of the village to the management of the Commune of Sangaredi is essential to:

- officially pass the new Hamdallaye territory under the management of the Sangarédi Commune and legally remove CBG from future liabilities (e.g. road maintenance, waste management);
- Proceed with the final acceptance of the houses by the PAPs
- Protect the PAPs property and land rights.

From the last visit, it was understood that CBG, with IFC agreement, would work toward establishing an interim land-use contract with the PAPs as per the preconisation for land tenure included in the 2016 RPF. Meanwhile, CBG indicated they will continue in parallel the lengthy formal process with the Ministry of Urban Planning to ensure PAPs will obtain a legal land title at the end of the mining lease.

During the May 2024 visit, CBG indicated that collaboration had started with the Ministry of Urban Planning. At the occasion of a meeting with the appropriate Ministry Direction (Direction de l'Aménagement du Territoire et de l'Urbanisme – DATU) in April 2024, CBG transferred all the appropriate documentation (maps, site GIS coordinate, implantation of roads, existing administrative documents) to establish the site legal status and prepare the appropriate tenure documents for the PAPs. From preliminary discussion with the Administration, the land tenure file for each PAP could include:

- A land use certificate delivered by the Sub-Prefecture;
- A site map; and
- A land title (to be confirmed).

The IESC will monitor the development of the land tenure resolution and will be able to close the related finding when the PAPs will be delivered with a land use certificate or land use contract.

Fassaly Fouthabé

The school remains unstaffed. During the visit, a member of the Community Relations team reiterated the efforts made by CBG to reach an agreement with the village of Mbouroré to register their children at the Fassaly Fouthabé school, as planned in the RAP, and to reach the threshold of 60 pupils necessary for the allocation of a state teacher. Multiple engagements with the Mbouroré community were undertaken, including commitments to provide officers to assist children in crossing the road and the creation of a new pedestrian road. The Prefectural School Service has been formally approached by the Commune of Sangaredi to allocate a teacher. CBG therefore asks the IESC to close this finding. The IESC acknowledges the efforts made by CBG to solve the issue but will not be able to close the finding until Fassaly Fouthabé children have access to a functioning school as per the RAP. Indeed, this school is a compensation for the lost access to the old Hamdallaye school (which was closed with Hamdallaye’s relocation), which was located at a reasonable distance from Fassaly Fouthabé.

During the December 2022 and June 2023 IESC visits, as well as through an official letter sent to CBG in October 2022, the Community of Fassaly Fouthabé expressed their request to be resettled. The community cited the loss of land and degraded living conditions (water, air quality, noise) caused by CBG's mining operations. CBG indicated that they officially responded to the community through a meeting held on May 10, 2024, to announce that they would not relocate them but would try to find solutions to reduce the magnitude of impacts on the village. The sequencing of exploitation of the Mbourore Plateau was one of CBG's proposals (approved by Mine Management), along with watering the COBAD road for 4 km on each side. According to CBG, the meeting took place in a calm atmosphere, with the community stating that they were expecting the refusal but requested more attention to managing impacts such as dust on crops and plantations, respect for buffer zones, and animal safety. The community also asked to be involved in the monitoring and rehabilitation of the mining sites. Despite several requests to receive an analysis or at least a detailed map of Fassaly Fouthabé territory and existing and planned mining activities, the IESC is still unable to assess the level of impact borne by the Fassaly Fouthabé community. The IESC acknowledges CBG's decision and Fassaly Fouthabé's alleged response but will request the minutes of the meeting (not available during the visit and report preparation) signed by the Fassaly Fouthabé community and/or a formal agreement listing CBG's additional mitigation measure commitments to close this finding. The implementation of the mitigation measures will be monitored in future IESC visits.

10.2.2 Hamdallaye and Fassaly Fouthabé Livelihood Restoration

Performance Standard 5: Hamdallaye and Fassaly Fouthabé Livelihood Restoration	
Associated open finding(s)	New: NA Legacy: June 2023_035

During the previous visit, CBG informed the IESC that it was in the process of contracting Expertise Sud for a 3-year term to manage the extended Livelihood Restoration Programme (LRP) following the end of CECI’s contract on June 30, 2023. Until the start of Expertise Sud's activities, scheduled for January 2024, CBG used the remaining balance of the CECI contract to finance three consultants, ensuring the continuity of ongoing LRP activities, including market gardening, poultry farming, and grasscutter breeding.

The contract with Expertise Sud was delayed until March 2024, and the budget for consultants ended at the end of 2023, leading to a few months' gap in the support and monitoring of LRP activities. However, during this period, CBG team (including its agronomist) continued the support

and monitoring. During the May 2024 visit, the IESC met with Expertise Sud, who introduced themselves, discussed their work to date, and outlined their plans for the coming months. The main takeaways are:

- Expertise Sud is a Guinean consultancy with experience in E&S studies and programmes for the mining sector, including RAP and LRP, as well as in community development programmes with international institutional donors. They have a record of working with Rio Tinto, GAC, Bel Air Mining, the EU, and USAID.
- The consultancy has 15 employees, with 7-8 dedicated to this project, including a veterinary doctor and a gender specialist. They are based in Conakry and are in the process of opening a base in Sangaredi.
- Following the programme launch notification on March 25, 2024, the Expertise Sud team began a rapid diagnosis in April 2024, consulting with the communities of Hamdallaye and Fassaly Fouthabé and meeting with local authorities. The objective of the rapid diagnosis was to determine the way forward for the existing LRP activities (introduced by CECI) before beginning a more comprehensive study to define new potential activities to develop in 2025. Following the rapid diagnosis, Expertise Sud is developing a detailed action plan to be validated by CBG during May 2024.
- In parallel, Expertise Sud has started to provide ad hoc technical advice to the community members involved in the existing LRP activities.

The status of Income Generating Activities (IGAs) and Expertise Sud recommendations are detailed in the following table.

IGA	Status as of May 2024	Expertise Sud recommendations (pending CBG validation)
Poultry	<ul style="list-style-type: none"> • A new batch of 1000 chicks has started in Hamdallaye, with egg production expected in June 2024. • In Fassaly, egg production is ongoing. 17% of egg production is purchased by CBG catering in Sangaredi. 	<ul style="list-style-type: none"> • Small refurbishment and improvement of the existing infrastructure and equipment. • Modification of the feedstuff formula and revision of the procurement scheme; assess the possibility of developing a local feed mill.
Small ruminants	<ul style="list-style-type: none"> • Fassaly has received its goat account. • Hamdallaye has yet to receive new goats. • Specific community infrastructure for this project remains unused. 	<ul style="list-style-type: none"> • Discuss alternative options to the existing model (modern goat breeding) and use of the infrastructure.
Bakery	<ul style="list-style-type: none"> • Unchanged, still no activities. • CBG has requested local authorities to assist in discussions with the community to decide on the future of the infrastructure. 	<ul style="list-style-type: none"> • Await the meeting with local authorities and the community to assess options for relaunching under a different business model.

IGA	Status as of May 2024	Expertise Sud recommendations (pending CBG validation)
	A discussion is planned for May 2024.	
Market gardening	<ul style="list-style-type: none"> • Approximately 8 tonnes of vegetables were produced during the last wet campaign (December-March 2024) in Hamdallaye and Fassaly Fouthabé. • 10% of the production is for consumption, and 90% is for sales. 	<ul style="list-style-type: none"> • Improvement of the irrigation and drainage systems. • Enhancement of techniques: crop calendar, introduction of short-cycle crops, production and care know-how.
Grass cutters	<ul style="list-style-type: none"> • The activity is ongoing in Fassaly Fouthabé, which now has 30 grass cutters; however, it is still not lucrative and faces difficulties in sourcing the main feed ingredient. • In Hamdallaye, only 2 animals are left, presenting consanguinity issues. 	<ul style="list-style-type: none"> • Expertise Sud is doubtful about the development of this activity (access to market, technical difficulties) and suggests developing an alternative pilot activity • For Fassaly, Expertise Sud will assist in market access.

In addition to the existing activities, Expertise Sud recommends developing a reforestation activity to prevent high sun exposure on the village LRP infrastructure and prioritize plants edible for ruminants. This activity would be developed in discussions with the biodiversity team and involve community participation, which has already shown interest.

In conclusion, the IESC acknowledges the effective mobilization of Expertise Sud, which appears to have the appropriate level of experience and expertise to implement activities on the ground. The fact that the team is already providing ad hoc technical advice is also a positive point. Based on the discussions that took place on-site, the IESC recommends CBG avoid spending too much energy and focus on trying to rejuvenate activities that have never worked. Instead, the focus of future activities should be on developing new livelihood restoration initiatives, with special attention given to the youth, women, and vulnerable populations.

One livelihood restoration activity developed outside the LRP as part of a grievance from herders was the planning and equipment of 2 hectares of pastureland. As detailed in the previous IESC report, the site was vandalized two months after being handed over to the community. Since then, the site remains unused. CBG, powerless in facing these events, decided to involve local authorities. A site inspection with the Sangaredi Mayor and Sous-préfet took place, and they will organize a meeting with the Hamdallaye Community to discuss the situation.

PAPs residing in Hamdallaye and Fassaly Fouthabé, impacted by other Plateaus (Thiapikouré, Parawi, Kagneka), have been integrated into the Phénix LRP. CBG has encouraged discussions between Expertise Sud and Phénix to explore potential collaboration and synergies.

10.3 Livelihood Restoration Programmes (LRPs)

10.3.1 Status of the LRPs

Performance Standard 5: Status of LRPs	
Associated open finding(s)	New: May 2024_RE_002, May 2024_RE_006 (mentioned in PS1), May 2024_RE_007 Legacy: Nov 2023_RE_002, June 2023_036

The Table 10-1 below presents the LRPs in progress (excluding the LRP associated with Hamdallaye and Fassaly Fouthabé RAP)

Table 10-1: LRPs in progress (as of November 2023)¹⁶

LRP name	#PAPs	LRP status	Implementation status
MUOA	255 ¹⁷ [1]	Approved	On-going through Phénix
Kankalaré	474	Approved	On-going through Phénix
Plateau Thiapikhouré	156	Approved	On-going through Phénix
Contingency blocks	77	Approved	On-going through Phénix
Plateau Kagnaka and Parawi extension	724	Approved	On-going through Phénix
Plateau Mbourore	1297	In development	

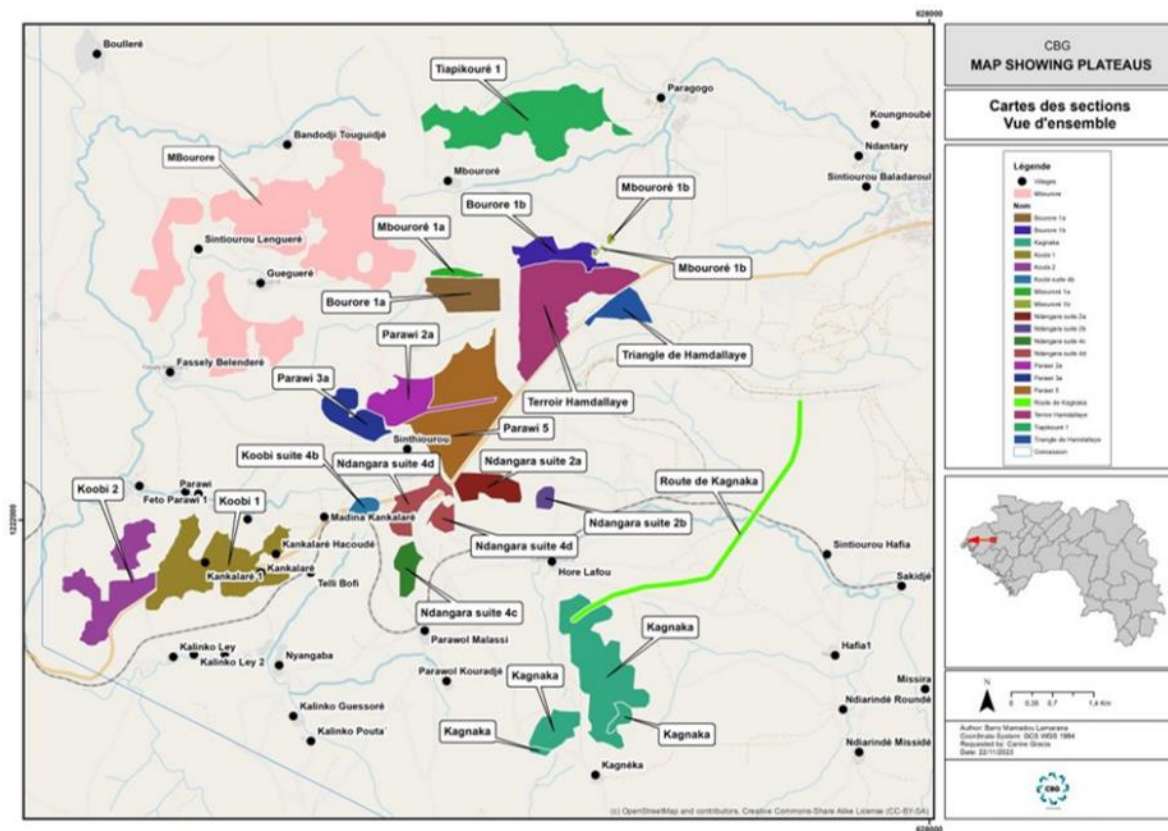


Figure 10.1 Plateaus under current operation and future operations

¹⁶ Post site visit note: final version of LRPs were communicated to the Lenders in January 2024.

¹⁷ This number is the number of PAP economically displaced in the MUOA RAP (which includes a total of 415 PAPs)

Validation of the LRPs

All the LRPs developed were approved by the Lenders in February 2024.

Timing of LRP

Compensation for Mbouroré was completed in Q1 2024, while the LRP is still in the development stage. In the case of Kagnaka, the LRP implementer initiated the diagnosis PAP survey in November 2023 and the launch of activities with the PAPs is scheduled for May 2024, while the asset inventory occurred in February 2021. The IESC wants to remind that in the case of economic displacement, the LRP is the document that manages a specific land acquisition process according to PS5 and using the principles and methodology approved in the company RPF.

The LRP is the document that guides stakeholder engagement, the compensation process (integrating asset and socioeconomic surveys) and defines additional livelihood restoration measures for a particular land acquisition event. It can also include other potential mitigation measures (e.g., creation of a community road, a borehole etc). It must be prepared before the start of the compensation process and validated by the community. This means that a Land Disturbance Permit should not be approved before the LRP is in place. However, the implementation of the livelihood restoration measures can start after the LDP, though it is recommended that they begin as close to the compensation payment date as possible to increase the opportunity for a reinvestment of the compensation amount and to immediately support the PAPs in their livelihood restoration.

LRP for 'brownfield' and High Voltage corridor land acquisitions

During the last IESC visit, the IESC asked whether the non-temporary land acquisition called 'brownfield' (understood to be plots of land never used in the vicinity of mine activity) impacting 59 PAPs, and the 'high voltage corridor' (73 PAPs) were subject to a LRP. CBG then stated its intention to incorporate the Brownfield PAPs into existing LRPs, provided they are not already covered by the LRP of another land acquisition event. For the high voltage corridor, it is yet to check the extend of the land acquisition per PAP which can be limited due to the nature of the infrastructure. CBG shared they were planning a socio-economic survey to define if a LRP was necessary. CBG indicated that the PAPs of Brownfield had not yet been considered for livelihood restoration measures. Brownfield being one of the most recent land takes, CBG should integrate them as soon as possible into a LRP.

These PAPs were/will not be¹⁸ compensated for land as the process had started before the new RPF validation. The PAPs of these two land acquisitions therefore had been included in the mitigation strategy for the 2016-2023 land compensation non-compliance.

Compensation payment

During the November visit, the resettlement specialist informed the IESC that one of his objectives, in collaboration with relevant departments, was to reduce compensation payment delays by streamlining and optimizing the internal compensation procedure. In May 2024, CBG indicated that discussions had begun with the Finance and Legal Directors to review the compensation process. One option under consideration is to outsource the process to a microfinance institution that would manage the compensation disbursement and financial education training. CBG is awaiting a proposal from a microfinance institution that have already provided similar services to GAC and Rio Tinto.

The IESC supports this principle if it can help CBG reduce the administrative burden associated with the internal procedure, which currently takes approximately 7-8 months from the end of the asset survey to effective payment. However, the IESC also recommends double-checking

¹⁸ Brownfiled PAPs have received their compensation while High voltage corridor PAPs payments are pending internal validation

references with GAC and Rio Tinto and exercising tight supervision over the provider, as outsourcing can increase the risks of corruption and diversion of funds from the PAP.

10.3.2 LRPs implementation by Phénix

Performance Standard 5: LRPs implemented by Phénix	
Associated open finding(s)	New: May 2024_RE_003, May 2024_RE_004, May 2024_RE_005 Legacy: June 2023_036, Nov 2023_RE_004

LRPs awarded to the Conakry-based provider Phénix include the MUOA LRP, the merged LRP of Kankalaré, Contingency Block, and Plateau Thiapokhouré, as well as the Kagnaka-Parawi LRP. A total of 1,538 Project-Affected Persons (PAPs), including 519 women, are enrolled across the three LRPs.

The principle behind Phénix's intervention is to support the development of activities already initiated by the PAPs at an individual level instead of creating new activities. This support can encompass technical advice, enrolment in training programs, assistance in obtaining official documents (e.g., biometric driving licenses), or the provision of inputs or small equipment. In some cases, larger equipment or infrastructure is provided to be shared among a small number of PAPs (e.g., water wells, motor pumps, grain mills). The LRP activities are divided into the following streams:

- Support to agriculture: Market gardening or perennial crops.
- Support to micro-entrepreneurship: Small commerce and trade.
- Access to vocational training: Defensive driving, heavy vehicle driving, IT training etc.
- Small ruminants and poultry breeding.

During the May 2024 visit, information and feedback about the LRP implementations were obtained through:

- A meeting with the representatives of the LRP committee of Paragogo (impacted mainly by the Thiapikouré and Parawi Plateaus).
- Visits to three PAPs (one from the Thiapikouré Plateau and two from the MUOA) at their premises.
- A meeting with Phénix, where the manager and the team presented activity reports for each LRP.
- A follow-up call with the Phénix manager.

The following observations can be drawn from the discussions:

- Emerging Success Stories:
 - Example 1: A PAP whose 2-hectare inherited plantation was impacted by the Thiapikouré Plateau in 2018 received support for his existing photography business in Sangaredi. In January 2024, Phénix assisted him in furnishing a new photography studio he had started to build. Consequently, he reported taking 800 portraits during Ramadan this year, compared to around 300 in previous years. Additionally, Phénix regularly contracts him for their own photography needs (events, reporting).
 - Example 2: A woman impacted by the MUOA (a few mango trees) received assistance in opening her tailor workshop. Previously working alone from home, she had started building a small workshop area outside her house. Phénix helped finalize the small building and provided a second sewing machine. She now has one employee and ten apprentices.

- Example 3: PAPs involved in agricultural activities have increased yields and production, though Phénix acknowledged initial difficulties in collecting production data for monitoring and evaluation purposes. Paragogo PAP representatives expressed satisfaction with this activity.
- Example 4: LRP implementation has provided jobs and contracts to more than 100 people, mostly PAPs, through the high intensity labour approach (fencing, land clearing etc) and the use of local suppliers (wood and metal craft, catering, sewing, well sinking etc)
- Variable Success Across Activities: Agricultural activities and support for small trade and commerce in urban areas (Sangaredi and Kamsar) or vocational training appear successful. However, other activities, such as support for small commerce in rural environments or small ruminant breeding, are less successful. Paragogo representatives noted that PAPs involved in these activities felt disadvantaged compared to those in other programs. PAPs in small ruminants received money and instructions to build a stable plus technical advice and those in small commerce received only a table. PAPs expected they would be provided with animals or a small working capital. On its side, Phénix expected more proactive participation from PAPs with a plan to increase support progressively. In Paragogo, 16 PAPs, mainly women, were enrolled in small commerce, raising questions about the village capacity to integrate that many shops compare to its size. Phénix also acknowledged making exception to the program rule to accept some women with no real commerce experience. Paragogo representatives requested clarification on the support to be provided to small ruminant and small commerce programs.
- Limited Opportunities for Women: Women often have fewer qualifications than men, potentially putting them at a disadvantage under Phénix's existing approach to build on existing capacity. The challenges in small commerce in Paragogo suggest that the approach for women may need revision. The subject was already discussed in the previous IESC report, but no real advancement is observed.
- Sustainability of Vocational Training Approach: Phénix has arranged sessions for defensive driving training or heavy vehicle driving training with external providers for the PAPs which is a good approach. Phénix also announced that they were supporting a woman going to nurse school and plan to support four PAPs for IT and mining operation trainings. However, Phénix may lack the financial and human resources to arrange bursaries or tailored curriculums for each PAP of the Program. Meantime, a significant portion of PAPs, especially youth are requesting other options for livelihood restoration. For high-demand trade training (e.g., masonry, mechanics), especially by the youth, short qualifying trainings (3 to 6 months) for PAP cohorts could be explored.
- Clarity in entitlement: There is a lack of clarity on how support is proportional to the level of impact. PAPs impacted for a few trees receive the same level of support as those losing their main income source. It is also unclear how cumulative impacts are managed as a PAP can be enrolled in multiple LRPs. Phénix indicates that vulnerable households have been identified and receive closer monitoring and support.

The average monetary value of provided equipment or input appears to be around USD 200 per PAP (excluding technical advice), but some PAPs received less (e.g., those in small commerce with a wood table). The question of the PAP understanding of the LRP entitlement was discussed in the previous report to which CBG answered that Phénix have emphasized PAP information, especially through the LRP Committees in each village. However, Paragogo representatives expressed uncertainty. The IESC requested to review CBG Phénix's program design for a better understanding of commitments per PAP but did not receive it.

Potential for Mutualized Infrastructure:

While Phénix's individual-based approach is supported by the IESC, opportunities for mutualized resources may exist such as for market gardening. Providing that the Community is ready to allow a specific land for the activity, a market gardening perimeter could be created within the most impacted villages – fenced and with water access - with plots for each PAP, following the model of Fassaly or Hamdallaye.

Livestock Disease Epidemic in Paragogo:

A recent livestock disease epidemic in Paragogo resulted in the loss of half the community's livestock (from 642 to 324 animals) despite Phénix's vaccination efforts. Phénix is discussing with CBG to support livestock reconstitution. Though CBG has no responsibility for the epidemic, the IESC encourages CBG to support the community, as such a loss in an environment already impacted by land acquisition could significantly affect livelihood.

MUOA LRP

Program activities commenced in Q1 2023 following a diagnostic phase (initiated in July 2022) and approval of a program design by CBG (in December 2022), with the program scheduled to end in July 2024. The MUOA LRP had a duration of two years, in contrast to the three-year duration for the other LRPs, due to the limited size of the impacted land per PAP. Out of 259 eligible PAPs for the MUOA, 237 enrolled in the program, while the remaining could not be located or were identified as being on a seasonal move. Phénix was in the process of developing a disengagement plan, and during the visit, discussions were held with the IESC and the Lenders about the timing of the LRP completion audit (within a six-month to two-year range after the end of the program, with one year appearing to be the most appropriate in this case).

When meeting with PAPs during the visit and recalling discussions with another MUOA PAP met in June 2023, questions regarding the compensation for the loss of revenue of economically impacted PAPs emerged. From the reading of the MUOA LRP, only crops and infrastructure were inventoried. Infrastructure is designated as “hangar” or “storage shed” without an indication of the nature of the activity practiced inside, making it difficult to understand that economic activities outside of agriculture had been impacted. The IESC requested CBG, post-visit, to provide the compensation files of the PAPs visited, but they were not provided. The objective was to check how the loss of revenue for PAPs who declared having an economic activity impacted by the MUOA, such as a garage or a café, had been considered in the compensation. From the 2016-2021 past land acquisition review, it seems that only infrastructure and crops were compensated. It should be noted that the MUOA LRP was developed after the compensations were made. This is an important point to clarify, as it would represent a major PS5 non-compliance.

Kankalaré, Thiapikouré and Contingency blocks merged LRP

The three LRPs have been consolidated and the implementation of the LRP commenced in Q2 2023 after the completion of the diagnostic phase¹⁹. Main outputs are tracked, such as the size of the market gardening perimeters, the vegetable production, the jobs obtained after training, the sales etc.

Kagnaka and Parawi Extension LRP

Phénix initiated the diagnosis phase in October 2023 and implementation was scheduled for February 2024. The launch of activities has been delayed and is now scheduled for June 2024.

¹⁹ The diagnostic phase includes a PAPs socio-economic survey and consultations to design the Programme activities



Thiapikhouré LRP - PAP in front of his new photographer studio in Sangaredi



MUOA LRP - PAP in her new tailor workshop and boutique in Kamsar



MUOA LRP – rice culture in Kamsar²⁰



Thiapikhouré-Kankalaré-Blocs de contingence LRP – Vegetable production

10.3.3 Mbouroré LRP

Asset surveys commenced in Q4 2022, and as of the visit, compensation payments were completed to the exception of a few cases of refusal or PAPs being absent. In August 2023, a one-year contract was signed with CEMED for the LRP design, which is still in progress. Meanwhile, the LDP has been

²⁰ Pictures extracted from Phénix presentation material

approved. A total of 1297 individuals and 713 ha (both agricultural and grazing land) are affected by the Mboure Plateau.

10.4 Exploration

Performance Standard 5: recommendation for exploration	
Associated open finding(s)	New: N/A Legacy: Nov 2023_RE_006

The IESC previously reported on recommendation for exploration campaigns and the finding remain open.

10.5 Cumulative Impacts

Performance Standard 5: Cumulative Impacts (internal – CBG Plateaus and external – other operators)	
Associated open finding(s)	New: N/A Legacy: Dec 2022_047

There has been no progress regarding topic since the last site visit, aside from initial discussions with the biodiversity teams, who possess software that could assist in conducting a balance assessment of the type of land available in each village. Therefore, the IESC reiterates the exact same finding and recommendation found in the previous report:

'Unfortunately, this subject could not be discussed during the Paris workshop for lack of time. Therefore, the IESC reiterates the need to identify and assess cumulative impacts on a number of communities that was discussed in the past IESC reports. CBG indicated the status of this analysis to be in progress but not finalized'.

Since the ArcGIS is a system that is now operational (October 2022) and the village boundary survey has been implemented in a number of villages, CBG is able to make such an assessment, which will include detailed cartographies for each studied village, showing the types of land still available. The recommendation has reportedly become a top priority given:

- The request from Fassaly Fouthabé to be relocated;
- The concerns expressed by communities over the availability of remaining agricultural land;
- The mine plan map which shows some communities surrounded by mining activities (e.g. Kagnaka, Guéguéré);
- The concerns expressed by CBG over the speculative practice observed in the community for the purpose of compensation: realization of unsustainable speculative plantations, anarchic occupation of the plateaus and sales to non-residents;
- The forthcoming CAO mediation on land.

The IESC recommends making such an assessment on the communities that were listed as villages potentially affected by a physical resettlement by 2022 in the 2015 RPF, namely: Fassaly Fouthabé, Parawi, Guéguéré, Kagnaka, Horé Lafou, Sintiourou Kourawel, Kourawel Center, Parawol Aliou and Parago plus adding Mbouroré to this list. If CBG human resources are not sufficient to conduct the assessment, the IESC recommends hiring consultants to perform this task.

In addition, it is recommended that this assessment be coordinated with the work currently undertaken by the Biodiversity team on the ILMP as they are exploring solutions for land acquisition-related consequences (e.g. the community in Kagnaka impinging on the forest because of reduced land availability) and for land rehabilitation, among other topics pertaining to Community Development.

In the absence of a robust assessment regarding the cumulative impacts of each of the mentioned villages, the risk that livelihood restoration will not be possible for some communities is considered to be high with the potential that communities will be dependent on CBG for survival (through continuous food assistance) and that grievances multiply.

10.6 Grievances

Performance Standard 5: Grievances	
Associated open finding(s)	New: N/A Legacy: Dec 2022_046

Section 6.3 is dedicated to the grievance mechanism and this section 10.6 will only address grievance management performance linked to land acquisition/PS5 (categorized under Resettlement in the CBG new grievance classification).

According to CBG material, 19 grievances related to PS5 were registered in 2024 (up to April 30th). Of these, 3 had been closed, and 16 were still being processed. The following breakdown of grievances is based on the 17 grievances registered under "resettlement/land occupation" as of March 31st, 2024, in the borrower's quarterly certificate, where more details are provided below:

- 9 grievances (53 %) relate to land take during land stripping. This issue has been outlined in previous reports, and each time, CBG indicated they were developing new processes to address it. Last year, the number of grievances linked to land takeovers had reduced, and the IESC indicated the associated finding could be closed after a new period with nil or limited related grievances. However, such grievances have returned to a high level, with 9 grievances in 3 months, 6 of which are linked to the North Cogon exploration. CBG indicates a new process is to be implemented with a 5m buffer zone to avoid discrepancies in GIS calculations between the Mining department, contractor, and inventories.
- 4 grievances (23 %) relate to alleged damage to plantations from operations. A better distinction should be made between grievances related to "Resettlement" (land take or loss in revenue due to normal operations) and those that are "Safety" issues (assets damaged during specific incidents). For example, the grievance linked to the destruction of a plantation from a fire involving an CBG train is a safety concern, not a resettlement concern. Other grievances might require more investigation to be categorized properly, such as the grievance from Thiapikoure market gardening GIE about dust impacting their crops. Is this a marginal episode, or does the dust from normal operations render the land unsuitable for agricultural activities, impacting the community's livelihood?
- It is noteworthy that another grievance related to the impact of dust on plantations is categorized under "Environment" and not "Resettlement" in the same register.
- 3 grievances (18 %) relate to the compensation process: one for the non-inventory of a plot, one for identity usurpation, and one for delays in compensation payment.
- 1 grievance (6 %) relates to the Livelihood Restoration Program (LRP), with a PAP complaining about delays in program implementation. Notably, there is a decrease in grievances related to LRP, which represented 35 % last year.

In addition to the 16 open grievances as of April 30th, 2024, an additional 31 grievances from 2022 and 2023 remain open. A significant number of these ongoing grievances are linked to the lengthy compensation process, from the investigation to determine if the complainant is eligible to the actual payment. Another type of grievance with several occurrences involves PAPs impacted by older Plateaus requesting to join the LRP. CBG indicates they first want to finalize their position and strategy in this regard before formulating a response.

10.7 Paris resettlement workshop action plan monitoring

Performance Standard 5: Paris resettlement workshop action plan monitoring	
Associated open finding(s)	New: May 2024_RE_008, May 2024_RE_009 Legacy: June 2023_042,

Following the December 2023 Paris resettlement workshop, an action plan was established that the IESC committed to monitoring through its visits and reports. The action plan addresses findings from past IESC reports and ESAP #21, which reviewed the resettlement events undertaken by CBG between 2016 and 2021.

Deliverable	Status/deadline	IESC comment
1973-2015 Historical Land Acquisition and Resettlement		
Clarification brief in relation to the 2010-2015 past compensation report.	Partially completed	CBG provided a brief on time. However, Policy Lenders have requested further details be provided in the brief.
Report (with maps) confirming restored areas restored and/or indicate different stages of completion (highlighting usable land)	Completed	Report presented during the May 2024 site visit See Section 11.6 in the Biodiversity section for an analysis of the report provided
Initial scoping of the potential avenues/options for handing back rehabilitated/restored land to communities	30/05/2024 Not completed	During the May 2024 site visit, discussions took place with the biodiversity, HSE, resettlement, and mine teams regarding the land return to the community options and interrelated subjects such as the cumulative impacts of Plateaus, the LDP process, and the role of the Landscape Management Plan. These discussions need to be continued and formalized. See finding June 2023_042
Resettlement Policy Framework (RPF)		

Deliverable	Status/deadline	IESC comment
Methodology for indexing compensation for land based on fair market value.	30/01/204 Not completed	CBG indicates that the methodology is ready but pending validation by the GM (appointment pending)
Final version of the RPF integrating key agreed items.	Completed	
RPF version for disclosure	Completed	
2016 – 2023 Past Land Acquisition and Resettlement Process		
Consolidated database of all affected persons	30/04/2024 Partly completed	<p>A demonstration of the existing database was provided during the IESC visit. About 2,224 hectares and 1,700 Project-Affected Persons (PAPs) (excluding potential duplicates) are concerned.</p> <p>A significant amount of work has already been done with the database. It appears functional and contains a substantial amount of data. However, not all data have been integrated yet, particularly grievances. CBG acknowledges difficulties in differentiating between landowners and land users in a number of cases.</p> <p>Additionally, just after the visit, the IESC requested the files available in the database for five specific PAPs; these files were not provided.</p>
Mitigation strategy to address past land compensation gaps (How?)	30/05/2024 Not completed	CBG shared initial thoughts through a presentation during the May visit that need to be developed further. This will be the focus of a new workshop with the Lenders, with the date to be confirmed.
Implementation of mitigation measures for affected PAPs	30/01/2025 Pending	
CBG to have completed full implementation of the agreed approach to address past land compensation gaps during this period for ALL affected persons	30/06/2025 Pending	
Livelihood Restoration Programs		

Deliverable	Status/deadline	IESC comment
Database - First report to be generated one month prior to IFC/Ramboll's visit	Completed	The database presentation includes the "LRP" status of the land acquisition events. The number of PAPs not currently covered by an LRP amounts to 401 (likely including duplicates).
Ramboll/Lenders to audit the database during next monitoring visit	30/04/2024 Not Completed	Due to time constraints, only a live query on the database could be conducted during the visit. Just after the visit, the IESC requested the files available in the database for five specific PAPs; these files were not provided.
Proof of integration of PAPs in existing LRPs	30/06/2024 Pending	
Memo on the approach for Bidikoun	30/05/2024 Not completed	The Bidikoun case is more complex, as land acquisitions in this plateau involve both the post- and pre-lender implication periods.
Final version of the LRP	Completed	

The IESC wants to draw CBG's attention to the human resources that will be needed for the implementation of this action plan, particularly from January 2025, which exceed the current team's capacity.

10.8 Monitoring

The absence of a Monitoring & Evaluation (M&E) Plan for resettlement activities has been an open IESC finding since 2021. The CBG Monitoring & Evaluation Advisor, hired in Q3 2023, finally presented the IESC and Lenders with an M&E Plan during the May 2024 visit. The Plan outlines the framework that will be used to monitor and assess the current LRP. It integrates mid-term and final assessment dates for the current LRPs and provides a strategy to assess livelihood restoration for LRPs lacking a baseline.

The Plan also details the monitoring framework, which is based on sampling 175 PAP files per month (with the objective of reviewing each PAP file twice a year) and collecting key performance indicators divided into three categories: process, outcome, and impact. While the IESC may have some reservations about certain aspects of the Plan (such as the feasibility of some proposed assessment methods and the choice of certain indicators), the related finding has been closed for the following reasons:

- A Plan has been provided as requested;
- The Plan, in its current stage, represents an important step toward effective monitoring of current activities; and
- Its implementation should not be delayed.

The IESC will monitor the implementation of the Plan and provide further recommendations, if necessary, during the next visit.

Another important point to highlight is the effort made by CBG to increase the M&E capacity of its LRP implementation providers. This was achieved through a training workshop organized in February 2024 by an international consultant. Feedback from Phénix regarding the workshop was very positive.

10.9 PS5 open findings

10.9.1 PS5 High significance findings

Table 10-2: Summary of open high significance findings, PS5

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_RE_001	Fassaly Fouthabé	Fassaly Fouthabé officially requested to be resettled in October 2022. The IESC recommended formulating a response based on an analysis of the cumulative impacts of the Plateaus/COBAD (on land, health, safety, etc.) and PS1 requirements. Such an analysis was not provided, but CBG engaged in further discussions with Fassaly, ultimately declining the resettlement request but agreeing on new mitigation measures.	CBG to provide the IESC and Lenders with a copy of the agreement (or minutes validated by both parties) integrating the new mitigation measures.	High	Open (new)
May 2024_RE_002	Other LRPs	Two compensations events, "brownfield" and "high voltage corridor", totalling 132 PAPs are not covered by a LRP.	Conduct the scheduled socioeconomical studies and develop a LRP for the PAPs or integrate them into existing LRPs, as appropriate	High	Open (new)
May 2024_RE_003	MUOA LRP	Informal economic activities outside of agriculture (small commerce and trade shops) appear to have been impacted by the MUOA. While assets were compensated, it is unclear if and how the loss of revenue was compensated	Provide the compensation file (asset survey, socio-economic survey, compensation agreement and payment receipt) of the PAPs (garage and café in Kamsar) visited by the IESC and Lenders.	High	Open (new)
May 2024_RE_007	LRPs	The LRP of Mbouroure Plateau is not completed while the LDP has been delivered (but the compensation has been paid). According to PS1, the LRP is the document prepared to plan for the compensation, the livelihood restoration measures and the stakeholder	For future Plateau, the LRP should be completed and validated by the Community before the land disturbance permit is validated	High	Open (new)

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		engagement in case of economic displacement			
June 2023_031	Hamdallaye Resettlement Site	<p>Land tenure is not yet secured for Hamdallaye new village with consequences of:</p> <ul style="list-style-type: none"> • lack of land securitisation for the PAPs; • impossibility to conduct the final acceptance of the houses by the PAP; • impossibility to transfer the management of the village to the Commune (including solid waste management which was subject of a past finding); and • Impossibility to close the physical aspects of the RAP 	<p>CBG has developed a way to address this issue.</p> <p>Complete the land tenure formalization and securitization process as per schedule agreed between the CBG Resettlement and Legal teams.</p> <p>Given the lack of progress since December 2022 visit and the criticality increasing over time, the significance is raised at High</p>	High	<p>Open</p> <p>(The IFC team participating to the November IESC visit mentioned they would accept the land-use contract to resettled households in the interim, as per proposed in the 2016 RPF. This finding will be deemed closed following the submission of the signed contracts)</p>
June 2023_035	Hamdallaye and Fassaly Fouthabé RAP	The absence of an assessment of the livelihood restoration status of the PAPs, the lack of cumulative impact assessment, the limited results of the CECI Program and the delay before the new LRP program will start again justifies a new food interim support.	Plan an additional interim support (food assistance) until LRP activities produce revenue for the PAPs	High	<p>Open</p> <p>While CBG express reluctance for food support, the IESC is not in the capacity to rule out that some PAPs have turned vulnerable because of the limited results of the phase 1 of the LRP. The finding could be closed by the livelihood status assessment scheduled in the RAP audit.</p>
June 2023_036	Other LRPs	The delayed implementation of the Kankalaré, Thiapikouré and Kagnaka LRPs (compared to the compensation date), the potential lack of remaining agricultural land expressed by the	Plan an additional interim support (food assistance) until LRP activities produce revenue for the PAPs	High	<p>Open</p> <p>While CBG express reluctance for food support, the IESC is not in the capacity to rule out that some PAPs have turned vulnerable because of</p>

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
		Community (and not verifiable in the absence of a cumulative impact assessment) justify the requirement for renewed interim support (food assistance)			the delays in the implementation of the LRPs. The finding could be closed by the M&E results of LRPs that should be available during next visit
June 2023_042	Retrossion of rehabilitated land	October 2021 finding raised at the High significance level in June 2023: CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues, despite the Mine Rehabilitation and Conceptual Closure Plan (MRCCP) presenting priority actions to begin by end 2018 (with one to be completed by end 2018)	October 2021 recommendation, still valid: Work to be initiated immediately to formalize CBG's current practice, for managing mined land rehabilitation and relinquishment, into a written procedure which includes not only key actions and responsibilities, but also standardized documents, to be signed by all parties, which record agreements reached/actions completed. This procedure to take account of the good practice guidance and/or recommendations, presented in the MRCCP, relevant to mined land rehabilitation and relinquishment	High	Open (interesting discussions have started between the Resettlement, biodiversity and Mine teams during the IESC visit on this regard that need to be continued/formalized)
Dec 2022_047	Cumulative impacts	Several communities appear to be surrounded by mining activities in current mine plan	<ul style="list-style-type: none"> • Prepare an assessment of the situation of the cumulative impacts of mining and hauling around the communities that were listed as villages potentially affected by a physical resettlement by 2022 in the 2016 RPF • Conduct assessment in coordination with the Biodiversity team 	High	Open.

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
			<ul style="list-style-type: none"> Minimize footprint as per IFC PS1 requirements 		
March 2022_032	Fassaly Fouthabé	School constructed as per the RAP but remains unstaffed.	While continuing to liaise with the local education directorate to obtain allocation of teachers for the school, explore alternative avenues with the community (e.g. "maîtres communautaires").	High	Open

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

10.9.2 PS5 Moderate significance findings

Table 10-3 Summary of open moderate significance findings, PS5

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_RE_005	Other LRPs	Some LRP activities, such as small ruminant breeding or small commerce in a rural environment, appear to be less successful.	Consider revising the approach for these activities	Moderate	Open (new)
May 2024_RE_004	Other LRPs	Entitlement and commitment for LRP support per component and per PAP lack clarity	Provide Phénix Program design or a document explaining the support that will receive PAPs or category of PAPs for each component for the duration of the Program	Moderate	Open (new)
Nov 2023_RE_004	Other LRPs	Women may have less opportunities in a LRP approach built on existing qualification or savoir-faire	Investigate additional options for women livelihood restoration activities, such as craft or agricultural product processing	Moderate	Open
Nov 2023_RE_005	Indirect impacts of land acquisition	Several PAPs both in Guéguéré and Kagnaka communities indicated having bought land in Boulléré (currently not affected by Plateau mining)	Consult with Boulléré Community to investigate the extent of the PAPs land acquisition in the village and potential positive and negative impacts	Moderate	Open
Nov 2023_RE_006	Exploration	PAPs in Guéguéré and Kagnaka explained having been approached to sell their land by people external to the villages during exploration time. Moreover, some speculative practices tend to demonstrate a lack of understanding of the principles of compensation	Raise awareness of the community about speculative behaviour and the compensation principles as early as when approaching a community for future exploration work.	Moderate	Open
June 2023_029	Resettlement systemic issues	Some critical findings have been stalling for several years (RPF update, Hamdallaye security of tenure, cumulative impact, retrocession of rehabilitated land, monitoring, LRP validations, staffing of the resettlement team). Part of these findings requires	Resettlement Management is integrated in the CBG roadmap, with sponsors and champions supporting the Resettlement	Moderate	Open (champion and sponsor are identified but not yet formalized, progress has

		inputs and/or actions and/or approval from other CBG departments.	department in tackling the high significance systemic issues. The implementation of key actions should be tracked in the same manner adopted for other management plans/actions plans already within the scope of the current Road Map.		been made to address the systemic issues.)
June 2023_034	Hamdallaye and Fassaly Fouthabé RAP	A completion audit is scheduled at the end of the RAP, including LRP. The LRP is being extended for 3-year which would postpone the completion audit whereas the physical component of the RAP is completed (except for the security of tenure) and there is an absence of formal monitoring/assessment of the current livelihood restoration status of the PAP	Consider an external interim audit of the RAP, including LRP to: 1) close the physical aspect of the RAP; and 2) document and assess the status of PAP livelihoods	Moderate	Open (rescheduled for end 2024 with Lenders' consent,significance of finding increased to moderate as time elapses)
Dec 2022_046	Grievances	Land takeover during land stripping activities is accounting for a large number of grievances	Implement identified mitigation measures and monitor related grievance evolution	Moderate	Open (number of grievances are back on a rise)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

10.9.3 PS5 Minor significance findings

Table 10-4 Summary of open minor significance findings, PS5

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May 2024_RE_009	Resettlement workshop	The memo about the integration of Bidikoun PAP in a LRP (special case with PAPs from land Acquisition dating pre and post 2016 financial deal) was due on 30/05/2024 but not provided	Provide memo about the integration of Bidikoun PAPs into a LRP	Minor	Open (new)
May 2024_RE_008	Resettlement workshop	During the December 2023 resettlement workshop, the IESC was tasked with auditing the database to monitor LRP implementation. However, the files of specific PAPs requested were not provided	Provide the files available in the database for the four PAPs requested	Minor	Open (new)
Nov 2023_RE_002	Compensation payment delays	Delays between asset inventory and compensation payments were around 7-8 months for the latest Plateaux according to Guéguéré and Kagnaka communities. While the community can still access their land during this period, these delays remain a burden for CBG and for the Community.	Streamline the internal compensation procedure to reduce delays	Minor	Open (CBG is considering outsourcing compensation management)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

11. PERFORMANCE STANDARD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

11.1 Introduction

The biodiversity component of the site visit was achieved through a series of meetings between the IESC biodiversity specialist and the CBG Biodiversity team, as well as field visits in the South-Cogon concession. Key topics are discussed in Sections 11.2-11.7 with Section 11.8 providing the locations and site-specific information which informed this report.

11.2 General Progress Update

Performance Standard 6: General Progress Update	
Associated open finding(s)	New: N/A Legacy: Nov 2023_BI_003

With the completion of the Integrated Landscape Management Plan and its sign off by the Lenders and IESC (see Section 11.7.1) all three ESAP items relating to biodiversity (ESAP Items 26,27 and 28) are complete. In that regard, the roadmap for biodiversity is also completed. For ease of viewing, progress of activities under the Biodiversity Action Plan is reported and shown in the same format as the various roadmap items being progressed by CBG. Progress of actions under the Biodiversity Action Plan (BAP) remains at 98% as there are two ongoing actions:

- The progression of the Moyen Bafing offset management plan; and
- The establishment of set aside areas in Boullère and Kourakoto.

The Boullère set aside programme reached a notable milestone during the site visit with the signing of the plan by CBG and GAC with the local leaders in that area (See section 11.7.2). CBG has confirmed that this has been documented and a report from IDR, CBG’s consultant for this work, will be provided to the IESC and Lenders for review. The Kourakoto set aside is not as far progressed as it requires the collaboration with SMB.

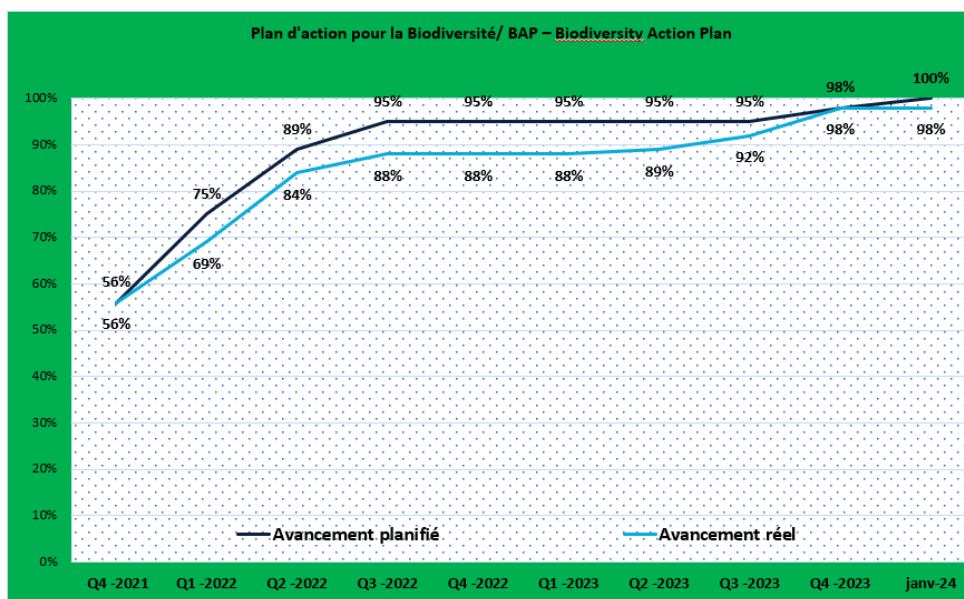


Figure 11.1: Biodiversity Action Plan Progress

11.3 Staffing and Equipment

Performance Standard 6: Staffing and Equipment	
Associated open finding(s)	New: N/A Legacy: Nov_2023_BI_002

During the May 2024 site visit, the attendees from the CBG Biodiversity team were:

- Biodiversity Manager;
- Botanical specialist;
- Faunal specialist;
- Rehabilitation specialist; and
- Inspection specialists (3).

The team continues to be extremely knowledgeable on the key issues for the Project, helped greatly by the continuity of staff within the team for a long period. The proposed future structure of the biodiversity team was discussed with the IESC biodiversity specialist. It involves the promotion of the faunal specialist to team lead to replace the current Biodiversity Manager who will leave the post in June 2024. The timescale for that departure was extended to allow the team more time to make the necessary changes and thus ensure a smooth hand over. The vacancy created by the promotion will be filled by a new hire in the coming months, with a preferred candidate having already been identified. This would ensure that there remain four key specialists²¹ in the team, each with different external contractors or junior staff reporting to them.

The ILMP action plan includes the hire of someone to oversee the ILMP by the end of 2025. However, this does not mean that there is no lead for the ILMP at this stage. The Inspection specialist within the biodiversity is also the president of the *Réseau Environnement Bauxite* (REB), the collaborative biodiversity network between the various operators in the area including CBG, GAC and SMB and already deals with many of the task managing the ILMP. That staff member is a sensible potential candidate for the permanent role when filled in 2025.

The Biodiversity Consultancy (TBC) continues to support with the BAP activities and a progress update report was provided which demonstrated all of the work completed to date. Many of the key staff at TBC who have worked recently on the CBG project have left that company recently, including the ape specialist and the specialist leading on the habitat mapping. However, a new ape specialist has recently joined, and the aquatic species specialist remains in post. The IESC remains confident that TBC is well resourced and able to provide the support that CBG requires.

However, one concern relates to the contractual situation. As the IESC understands it, TBC continues to work under the existing contract budget for 2021-2023 whilst awaiting the extension to its appointment. The absence of a Director General is delaying approval of that extension. As previous delays for the appointment of TBC led to significant delays in the updated BAP and associated documents being prepared, it is extremely important that similar delays do not occur again.

²¹ There is currently one inspection specialist supported by two inspectors. This continues to meet the minimum expected requirement to allow sufficient coverage of all inspections and with the continued growth of operations, more inspectors are likely to be required in future.

11.4 Biodiversity Inspections

Performance Standard 6: Biodiversity Inspections	
Associated open finding(s)	New: N/A Legacy: Nov 2023_BI_004

The IESC biodiversity specialist and CBG biodiversity team visited the Kagnaka mine haul road and Kagnaka plateau mining area to observe the activities ongoing in the area and the biodiversity protection measures employed.

The haul road was previously visited in November 2023 and whilst the protections put in place to prevent sedimentation and pollution of watercourses were generally good, a finding in that site visit report recommended that those measures should be monitored ahead of the rainy season to ensure their effectiveness. During this visit, it was clear that the protection around the headwater had already channelled rainfall runoff from the road as intended and the head water showed no sign of impacts. However, at the sediment control further north along the road, it was clear that some runoff is bypassing the controls and the absence of any planting is leaving the soil susceptible to erosion. It was reported to the IESC biodiversity specialist that planting of vetiver is planned, although approval from above in the HSECQ Department was still awaited.

Ahead of the heavier rains, this situation should be rectified to ensure that all rainfall runoff from the road enters the sediment controls and planting of vetiver should occur as soon as possible to stabilise the soil and reduce erosion. This should be monitored as part of forthcoming biodiversity monitoring at all such features along the road, not just the one visited by the IESC biodiversity specialist.

11.5 Land Disturbance Permits

Performance Standard 6: Land Disturbance Permit	
Associated open finding(s)	New: May_2024_BI_002 Legacy: N/A

11.5.1 Existing Kagnaka Land Disturbance Permit

The IESC biodiversity specialist visited the Kagnaka plateau area to review the biodiversity protections put in place as part of the LDP process and to understand the approach to monitoring/inspecting the works.

In-field GIS mapping showing the LDP boundaries was used to confirm that vegetation clearance has not extended beyond that permitted by the LDP. It was explained to the IESC biodiversity specialist that during the vegetation clearance, one of the biodiversity inspectors is on site, marks out the limit to the LDP area with flags and then ensures that it is not crossed. The process has been seen to work.

The LDP boundary at Kagnaka was developed partly in response to the presence of gallery forest nearby. Topsoil pushed to the margin of the LDP area has abundant natural regeneration already and is likely to develop a very natural looking woodland habitat within a few years. A small group of green monkeys was seen feeding in the area.

Similar areas of topsoil pushed to the side of the Sangaredi plateau and left for many decades were seen to support well-developed woodland and secondary forest. It is an important long-term

consideration as the topsoil will be required for future rehabilitation of the plateau, but by that time accessing it might require disturbance or even destruction of well-established natural regeneration that has created a natural buffer for the gallery forest. It is worth noting here however that the situation with topsoil has improved since CBG’s updated approach to topsoil usage on the rehabilitation areas. As it is now used sparingly with smaller pockets of topsoil, rather than a thicker layer across the full areas, the previous pressure on having sufficient topsoil for rehabilitation all areas has decreased and it may be in the future that topsoil areas such as these at Kagneka might not need to be fully disturbed.

11.5.2 Future Kagnaka Land Disturbance Permits

CBG has demonstrated that once identified, the limits of agreed LDPs are observed and monitored effectively by the biodiversity inspection team. As reiterated by a multi-disciplinary meeting in Sangaredi during this site visit, the LDP process considers much more than biodiversity, however the presence of gallery forest in the river valleys running around and between all the plateaux is a consistent buffer at most locations. A buffer around the gallery forest of at least 100 m is intended to protect this sensitive habitat type, the species which depend upon it (including chimpanzees) and the watercourses which typically flow through them.

However, whilst this arbitrary distance was a sensible approach based on available data at the time of establishment of the LDP process, the ongoing detailed biodiversity studies indicate that for some species, it may not be sufficient. In particular, camera trap records, dung and feeding remains in recent chimpanzee survey results show that the secondary forest and woodland beyond the gallery forest is also very important for the species. Those areas also provide the only connectivity between areas of gallery forest increasingly fragmented or isolated within the South of Cogon concession. Three key chimpanzee areas have been identified within the South of Cogon concession and surveys have been undertaken across them as shown in Figure 11.2.

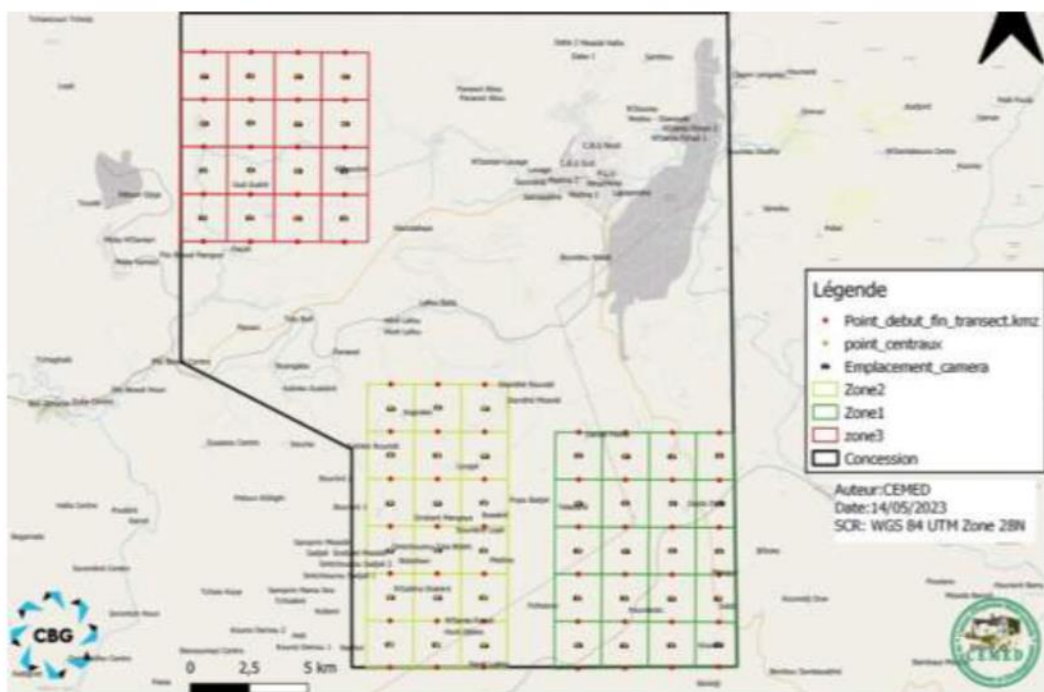


Figure 11.2: Chimpanzee Survey Zones

To date, mining within the South of Cogon concession had largely remained outside of the key chimpanzee areas, however, the start of mining in Kagnaka has changed that. The area east and south of the village of Kagnaka and towards the village of Lougal, includes three proposed future LDP areas. The recent habitat mapping exercise by CBG identified woodland and secondary forest within these areas, and those habitats provide a link between the extensive gallery forest areas to

the east and west of the Kagnaka plateau. These are crucial movement corridors for chimpanzees and other species. Signs of chimpanzee activity in these woodlands have been recorded during surveys and feeding signs and dung were seen there by the IESC biodiversity specialist and CBG biodiversity team during the site visit.

There are many competing demands on those same areas of woodland and secondary forest being used by chimpanzees. During the site visit, the IESC biodiversity specialist saw all of tree felling, wood collection, livestock grazing and basic agriculture occurring within those habitats less than 500 m from active chimpanzee nesting and feeding areas within gallery forest. At present, the two are able to co-exist in a semi-sustainable way and efforts to continue that situation are ongoing as part of community engagement within the ILMP²². In order for that situation to continue, the LDP process will need to sufficiently protect areas of the secondary forest and woodland. Without that, the chimpanzees would lose important foraging and movement habitat and community pressure on the gallery forests would increase further.

11.6 Rehabilitation

Performance Standard 6: Rehabilitation	
Associated open finding(s)	New: May_2024_BI_001 Legacy: N/A

Rehabilitation continues under the supervision of the rehabilitation specialist who is working with the local nurseries established by CBG to provide sufficient native trees of local provenance for annual rehabilitation targets set out in a Five-Year Rehabilitation Plan. There are reported to be approximately 200,000 trees available for rehabilitation activities in 2024.

11.6.1 Five Year Rehabilitation Plan

The 2024 target in the Five-Year Rehabilitation Plan for 2021-2025 is 255.47 ha of rehabilitated land. At the time of the visit, the biodiversity team had been provided one area for rehabilitation, stated to be 58 ha. This represents just 23 % of the 2024 target area. When visited on site, the area appeared larger than 58 ha but still considerably short of the total area required to meet the target.

CBG fell short of its 2023 land rehabilitation target by 59 ha and the hope had been that the overall shortfall against target for that point of 24 ha could be recovered in 2024. However, although it could increase, working on the provided figure of 58 ha of land to be rehabilitated in 2024, by the end of the year CBG will have rehabilitated 806 ha of land. In order to meet the five-year target of 1,287 hectares, 481 ha of land would need to be rehabilitated in 2025, which is likely not going to be possible.

The key factor in reaching the target is how much land is released by the mine for rehabilitation. Concerns were raised by the IESC in November 2023 that the drop below target was potentially indicative of a problem with provision of previously mined land to the CBG biodiversity team for rehabilitation and it appears from the May 2024 that the problem has continued. There are trees and budget available for rehabilitation works, but until recently, no areas available to be rehabilitated.

In the face of this, the biodiversity team has undertaken rehabilitation elsewhere within the concession including 150 ha within degraded forest, which is commendable. However, under the details of the five year rehabilitation plan, this technically doesn't count towards the target total

²² See also November 2023 site visit report for details of a vilage event launching that engagement.

which was prepared to ensure CBG closed the gap on how much post-mining land was unrehabilitated across the South of Cogon concession.

2025 will be the last year of the five-year rehabilitation plan and the level of rehabilitation work undertaken under the plan to date has certainly helped with that issue, but if the amount rehabilitated from this year on remains lower, the gap will widen again, undoing some of the good work of recent years.

A plan for rehabilitation from 2025 onwards is required and it must consider community requirements and the review of success of previous rehabilitation.

11.6.2 Success of Rehabilitation

As part of the May 2024 visit, in response to a finding in a previous site visit report, CBG provided mapping and information on its work to identify the success of previous rehabilitation with success mostly relating to the persistence of the rehabilitated areas to a state where they can be resilient to the various pressures put upon them.

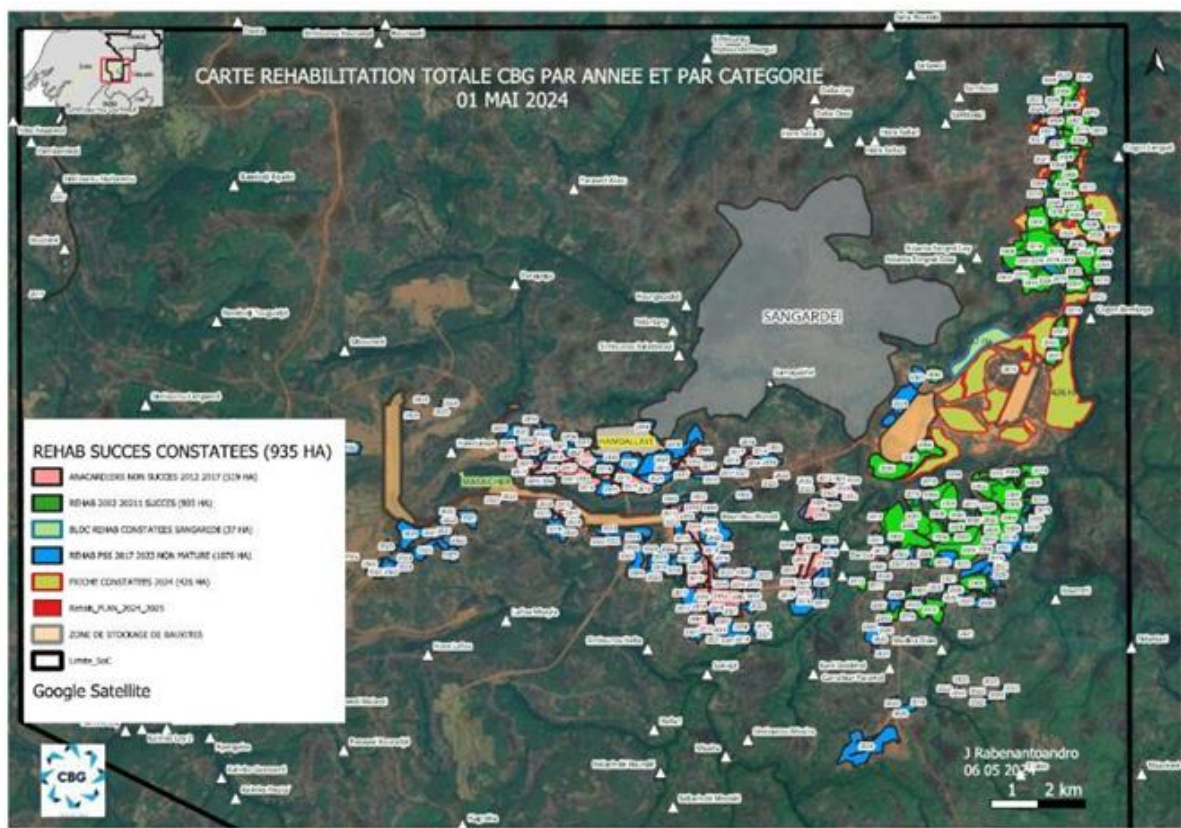


Figure 11.3: Mapping of rehabilitation Success status

The key pressures are human related:

- Cutting of young trees for wood;
- Clearance of young trees for livestock or crops;
- Burning of areas for agriculture; and
- Cutting of larger trees for charcoal production.

There is also a large area of rehabilitation which pre-dates the five-year rehabilitation plan when the focus, under the direction of the Guinean government, was planting of cashew trees. Unfortunately, across much of the area, those trees have grown extremely poorly and certainly not

large enough to bear fruit. A lack of nitrogen in the soil is one likely reason for this. The cashew areas have not been cut and burned as other rehabilitated areas.

It is proposed by CBG that any of the 200,000 young trees ready for rehabilitation this year in the nurseries, which are not used on the Mbouroré rehabilitation area will be used to improve existing rehabilitation, particularly the cashew tree areas. Where available, topsoil or labour/vehicles assigned for those rehabilitation areas should be similarly redirected. A particular area of focus should be close to the new Hamdallaye village where the cashew trees are not growing well. A balanced approach should be taken in this area, ensuring that fruit trees and other trees from which communities derive products are planted, alongside native trees primarily intended to increase biodiversity value. Such an approach is in line with the aims of the ILMP and would address an area of rehabilitation previously raised as a concern by communities. While not “new” rehabilitation to be counted under the five-year plan target, it would be an excellent use of the resources available due to the absence of other areas to rehabilitate. CBG should consider how best to record and report this to the IESC and lenders in future, particularly within details of the final year of the five ear rehabilitation plan when how a likely shortfall in rehabilitation of post-mining land has been addressed.

11.7 Integrated Landscape Management Plan (ESAP Item 28)

11.7.1 Final ILMP

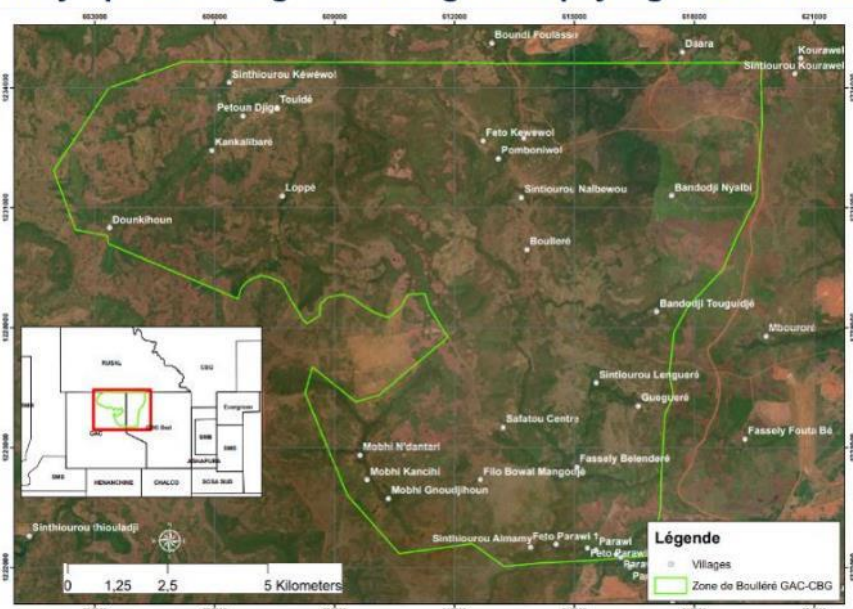
Following a review of the updated action plan that supports the ILMP and the CBG response to final comments, the IESC confirms that the ILMP has been completed and the ESAP item (Item 28) can be closed. The IESC has issued a letter to CBG confirming its acceptance of the closure of the ESAP Item.

11.7.2 ILMP Activities – Boullère

The completion of preparation of the ILMP marks an important milestone for CBG and the focus can now be entirely on implementing the activities and actions set out within it. To that end, the IESC biodiversity specialist and CBG biodiversity team attended a meeting in Sangaredi where the agreement between CBG, GAC and the relevant local leaders was signed in order to commence a

GESTION DES IMPACTS CUMULATIFS

Projet pilote de la gestion intégrée du paysage CBG et GAC



pilot project in Boullère within the area shown below which straddles both the CBG and GAC concessions.

Figure 11.4: Location of Boullère Pilot Project

The activities of the pilot project align with the ILMP actions particularly:

- Tree planting: ILMP Action 1.1 Natural Resource Management and Biodiversity - Restoration of Spring heads and Gallery forests;
- Agriculture: ILMP Action 2.3 Local Economy Development – Promoting Fruit and Vegetable Crops; and
- Establishment of Beekeeping activities: ILMP Action 2.5 Local Economy Development – Beekeeping Development.

The IESC biodiversity specialist will look for an update on progress of the pilot programme during the next site visit.

11.8 Site Visit

Figure 11.5 shows the location of points visited during the site visit (indicated by red dots). The information gathered at each location informed the preceding sections with Figure 11.6 providing photographs of the locations and location-specific information.

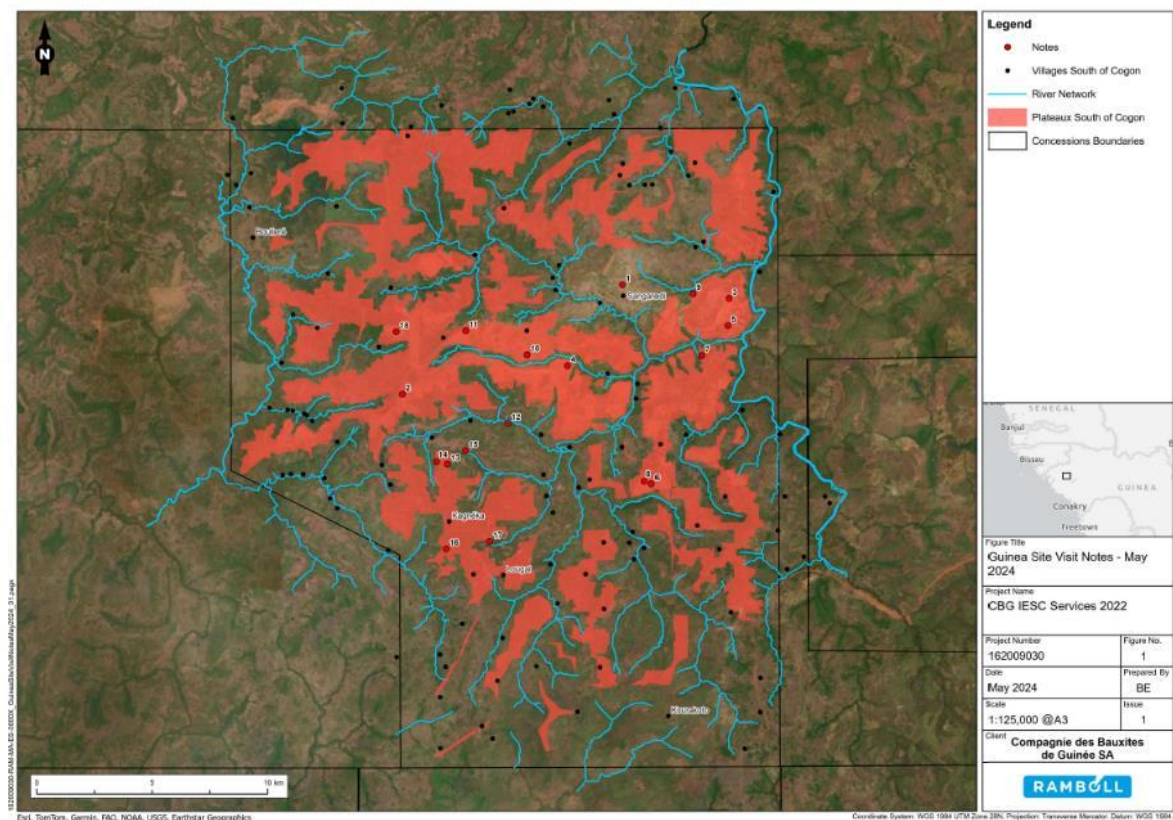













Figure 11.5: Locations Visited within the South Cogon Concession between 14th-16th May 2024




Location	Photograph	Details
1		<p>CBG biodiversity inspection specialist/ REB president and current lead on ILMP being interviewed by journalists at the launch of the Boullère pilot project.</p>
2		<p>Area of rehabilitation near N'Dangara seen by IESC biodiversity specialist in 2023 to be progressing well, has been burned by community, killing the majority of the trees planted. Notably, this is an area where continuous topsoil was placed across the area allowing fire to spread easily. This highlights the value of the patchy topsoil approach trialled elsewhere which prevents fire spreading easily.</p>

Location	Photograph	Details
3		<p>The Sangarédi plateau was one of the first areas mined and it remains open. There are areas where stripped topsoil was stored which have returned to woodland and secondary forest. This is not land rehabilitated by CBG and is still technically an active mine area, but areas are used by biodiversity and communities. This plateau has some of the highest quality bauxite and so will remain open for the foreseeable future. It is important for CBG to consider how it manages areas such as this where natural regeneration has occurred in areas where mining is still active. There are potential impacts on biodiversity and communities using these areas but the LDP process does not cover such situations.</p>
4		<p>Ten year old cashew tress – old mine rehabilitation. Trees are in poor health, not bearing any fruit . CBG intends to use “spare” 2024 rehabilitation trees to improve this area of rehabilitation.</p>

Location	Photograph	Details
5		<p>Example of community using natural regeneration within the active Sangaredi plateau mine area. Trees have been partially burned to allow grazing of livestock.</p>
6		<p>Area of excellent tree growth at 2021 rehabilitation area. No topsoil was used and so trees are safe from fire.</p>
7		<p>This area of mature rehabilitation acted as a reference area of how good rehabilitation can be. However, just since previous site visit the area is now used by community with burning and clearance of ground level vegetation and, charcoal production. More recent rehabilitation nearby also has been burned.</p>

Location	Photograph	Details
8		<p>Another example of successful rehabilitation, this time from 2020.</p>
9		<p>Another part of the Sangarédi plateau. This was exploited early in the life of the mine and rehabilitated just with topsoil. There has been excellent tree growth but mine may return to area in future. However, there are now cashews and other community uses such as wood collection. Community members are paid to watch for fires or charcoal production in order to protect it – but there is a need for consideration of what would be the process were CBG to return to mine it again.</p>
10		<p>The unsuccessful rehabilitation close to new Hamdallaye where cashew trees have not grown well. Intention of CBG biodiversity team is to improve this rehabilitation in 2024.</p>

Location	Photograph	Details
11		<p>An example of recently completed rehabilitation. Undertaken to a high standard but the kind of small area, close to a road that will likely be utilised by community through burning and clearance before the trees are sufficiently tall to survive.</p>
12		<p>Sediment protection measures on the Kagnaka haul road. There is good natural regeneration on banks. There needs to be vetiver planting to stabilise slopes and channels. The first rain has shown water flowing past the sediment basins. A re-engineered solution is required. Important to monitor and get right before any impacts on watercourses</p>
13		<p>Vegetation clearance on the Kagnaka plateau. IESC viewed limit of clearance which has been managed well. There has been spontaneous regrowth at limits where topsoil is pushed. Biodiversity inspectors were on site every day during clearance to ensure buffer. The limit is marked out with flags prior to clearance.</p>

Location	Photograph	Details
14		<p>Vegetation clearance on the Kagnaka plateau. Limit of mining well observed with gallery forest visible nearby. Again, topsoil pushed to edge, already lots of spontaneous growth. Will form excellent woodland or even secondary forest. Monkeys were seen along with people farming – raising the same consideration as at Sangaredi plateau of how will CBG approach such areas in the future.</p>
15		<p>Head water protection near the Kagnaka haul road. The first rains seem to have been contained by sediment measures. no sign of sediment in the headwater itself. Would benefit from vetiver planting to stabilise the banks.</p>
16		<p>Area further south on Kagnaka plateau (future LDP area) where natural secondary forest has been partially cleared and cashew planted, possibly speculative planting ahead of mining. Native fruit trees still growing in area – and chimpanzees likely still feed on them as so close to known forests they use regularly.</p>



Location	Photograph	Details
17		<p>View of woodland/secondary forest at edge of good forest where many chimpanzees occur. Evidence seen of collection of wood, felling of trees, charcoal production. cashew plantation replacing some areas of forest. The LDP process needs to consider use of these non-gallery forest areas by chimpanzees</p>
18		<p>The Mbouroré rehabilitation area – the only area available for 2024. Stated to be 58 ha but likely more.</p>

Figure 11.6: Locations Visited during Site Visit between 28th-30th November

11.9 PS6 open findings

11.9.1 PS6 High significance findings

Table 11-1: Summary of open high significance findings, PS6

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May_2024_BI_002	LDP	Future LDP requests need to consider importance of other woodland and forest not just gallery forest. Recent CBG studies have shown importance of this habitat for chimpanzees and they are also well used by communities.	The team developing LDPs should develop an approach to protecting key areas of non-gallery forest woodlands and forest, particularly within areas of known chimpanzee concentrations, e.g. Kagnaka.	High	Open (new)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

11.9.2 PS6 Moderate significance findings

Table 11-2 Summary of open moderate significance findings, PS6

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
May_2024_BI_001	Rehabilitation	<p>The rehabilitation completed in 2023 fell short of target by 59 ha. However, as CBG undertook an additional 36 ha ahead of target in 2021, the project was only 23 ha behind overall target at the end of 2023.</p> <p>However, it appears during the May 2024 site visit that the rehabilitation target for 2024 will be missed by as much as 197 ha. This would leave CBG significantly behind the overall five-year rehabilitation plan target and unlikely to be able to catch up in 2025.</p> <p>There is a considerable surplus of trees available for rehabilitation and these should be planted somewhere in 2024 and not wasted.</p> <p>Future rehabilitation beyond the current 5-year plan requires planning now.</p>	<p>Confirm the size of the 2024 rehabilitation area at Mbourore plateau (which may be larger than the stated 58 ha) so that end of 2024 position against the target is known.</p> <p>Undertake additional rehabilitation with native trees at unsuccessful cashew plantation rehabilitation areas and calculate area of this type of rehabilitation in 2024. This should include the area close to Hamdallaye as set out in the report text.</p> <p>Undertake additional gallery forest habitat rehabilitation and calculate area of this type of rehabilitation in 2024.</p> <p>Develop a plan for rehabilitation of mined land post 2025 that considers availability of suitable land for rehabilitation, areas of previous rehabilitation requiring further work alongside ongoing rehabilitation of more recently mined areas. The plan should be developed in conjunction with the social teams in order to ensure that future rehabilitation is fit for purpose for communities.</p>	Moderate	Open (new) CBG can offset the shortfall through old rehabilitation and forest enhancement.
Nov 2023_BI_003	Biodiversity Offset	<p>Progress with the Moyen Bafing Offset. WCF was responsible for the offset program until the end of 2023. Certainty on how the offset will progress is required.</p>	<p>CBG to provide an update to the IESC and Lenders on the current situation, by sharing RINA independent audit's results.</p>	Moderate	Open

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Nov 2023_BI_004	Sediment monitoring	Head water of watercourse on eastern side of Kagnaka road has been protected from sedimentation by a series of ponds which take road runoff.	The effectiveness of the sediment protection needs to be monitored.	Moderate	Open

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

11.9.3 PS6 Minor significance findings

ID	Aspect	Finding Description	IESC Recommendation	Significance	IESC Opinion on Status in May 2024
Nov_2023_BI_002	Biodiversity - resourcing	ILMP lead and other hires	As set out in the staff organogram provided to the IESC, CBG should appoint a dedicated specialist to oversee the ILMP process. At present it is being overseen by a variety of biodiversity team staff, not least the biodiversity team manager. However, the Biodiversity Manager leaves by June 2024 and so the ILMP specialist should be in post before then. The other open posts within the organogram awaiting hires should also be filled.	Minor	Open Dedicated specialist to oversee the process has not yet been appointed.

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

12. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

As noted in the November 2023 monitoring report, all the actions from the Cultural Heritage Management Action Plan are reportedly completed (see figure below).

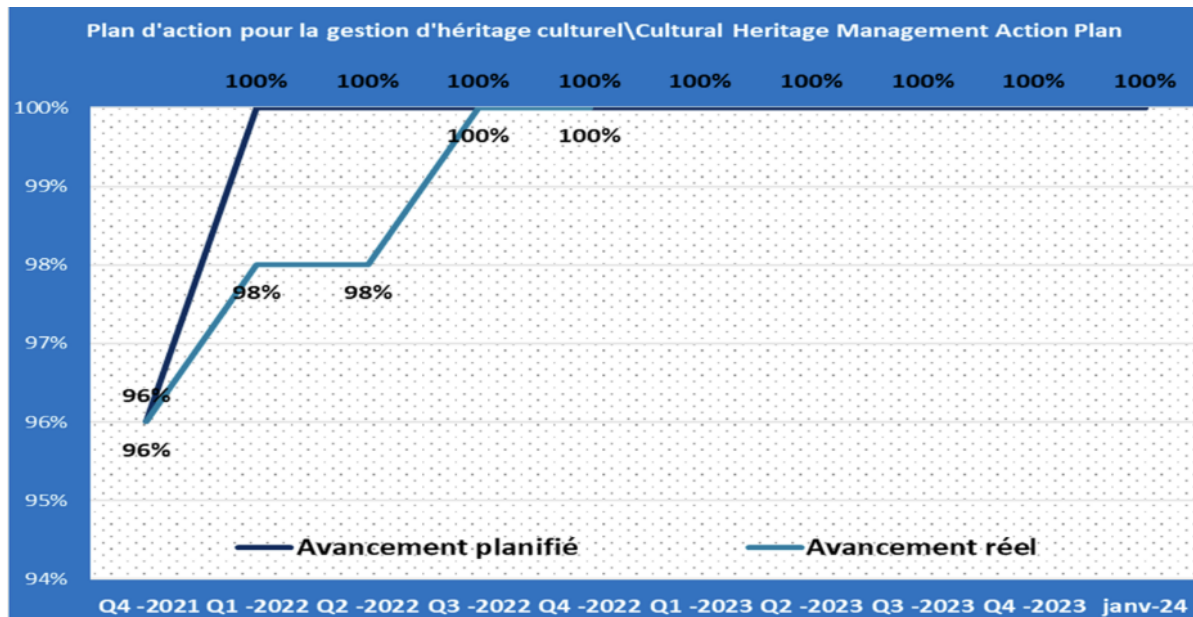


Figure 12.1 Status of the Cultural Heritage Management Action Plan

As was noted in the IESC’s November 2023 report, the considerations from the CHMP (Cultural Heritage Management Plan) are integrated into CBG general induction, and community awareness on this topic is performed during SEP meetings. The cultural heritage register is regularly updated by CBG, and the identification of sacred sites is performed as part of the land disturbance permit process.

9 cultural induction sessions were provided to CBG personnel and subconsultants from January to April 2024. In total, 226 people took part in the cultural heritage induction, including 25 women.

CBG confirmed the 2023 Cultural Heritage report has been developed in the 1st quarter of 2024.

No concerns related to Cultural Heritage were recorded during the period January – April 2024, as no cultural heritage-related grievances and community request for assistance have been received by CBG in 2024, as per the material shared for review. Moreover, CBG and its subcontractors have not reported any incidents related to cultural heritage during this period.

From January to April 2024, 11 consultations and awareness-raising meetings on cultural heritage were held, covering 11 villages. 284 people including 119 women were reached during the various meetings.

24 cultural heritage sites were visited including 5 along the railway line, 10 in Kourawel and 9 in Parawol Aliou in the commune of Sangarédi.

No findings on cultural heritage were made during the May 2024 site visit.

APPENDIX 1
SITE VISIT ITINERARY

ENV	RESPONSABLE	LOGISTIQUE	SST	RESPONSABLE	LOGISTIQUE	SOCIAL	RESPONSABLE	LOGISTIQUE	RESETTLEMENT	RESPONSABLE	LOGISTIQUE	BIODIVERSITÉ	RESPONSABLE	LOGISTIQUE
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Déjeuner au restaurant

OPENING MEETING

LUNDI 14H - 16H	<p>"INDUCTION"</p> <ul style="list-style-type: none"> - Introduction - Saran Camara / Aliou Barry - Présentation CBG - Aliou Barry - Mise à jour de la structure Groupe HSECO (recruits, training) - Aliou Barry - Mise à jour des progrès de MUOA - Abdelkader Masri - Mise à jour de l'état du projet comprenant : Les dernières informations sur le plan minier et les récents PDL (Sud de Cogan) - Lamarana Barry - Carte des zones actuellement minées - Lamarana Barry - Travaux planifiés à l'usine - Martin Lancot - Mise à jour de la Feuille de route E&S (ESAP) - Saran Camara / Martin Lancot - Revue des recommandations - HSEC Team - Revue du programme - Saran Camara <p>Amphithéâtre - KAMSAR</p>												<p>Pause café 30 pour personnes (Croissant)</p>	
	ENV	RESPONSABLE	LOGISTIQUE	SST	RESPONSABLE	LOGISTIQUE	SOCIAL	RESPONSABLE	LOGISTIQUE	RESETTLEMENT	RESPONSABLE	LOGISTIQUE	BIODIVERSITÉ	RESPONSABLE

LUNDI 13 16H - 17H	<p>- Mise à jour sur les plans de gestion environnementale - Jocelyn Bertrand</p> <p>- Mise à jour sur le recalibrage du modèle de bilan hydro/eau souterraine - Jocelyn Bertrand</p> <p>Salle de Réunion Extension 1er étage - KAMSAR</p>	<p>Jocelyn Agassimou Mansare Saran</p> <p>Pause café 5 personnes</p> <p>Noémie</p>	<p>Voyage de Paris à Conakry Nuit à Conakry Réservation à l'Onomo</p> <p>Service Voyage Conakry</p>	<p>Vincent</p>	<p>- Capacité et compétence organisationnelles - Habib Diallo</p> <p>- Développement ISOMETrix et gestion des données dans IsoMetrix (patrimoine social, culturel) - Habib Diallo</p> <p>- Betafence - Habib Diallo</p> <p>Salle de Conférence DG - KAMSAR</p>	<p>Habib Asmaou Arabiou</p> <p>Chiara / Anna</p>	<p>Pause café 10 personnes</p>	<p>Discussion with biodiversity and resettlement teams on land rehabilitation and process for land handover to communities - Johny Rabenantoandro / William Nianogo / Carine Gracia / Saran Camara</p> <p>Salle de Conférence Extension - KAMSAR</p>	<p>Carine Johny William Saran</p> <p>Pause Café 10 personnes</p> <p>Adam / Miguel</p>
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Diner au restaurant

MARDI 14 Mai 2024

Petits déjeuner dans les villas

MARDI 14 08H - 12H	<p>- Contrôle des sédiments dans le système de drainage de Kamsar / Sangarédi - Jocelyn Bertrand</p> <p>- Présentation Gestion des Déchets (incluant la réutilisation des cendres et discussion sur Bendougou) - Mme Dramé</p> <p>- Révision du ou des derniers rapports de campagne de dragage - Jocelyn Bertrand</p> <p>- Bruit et vibrations : localisation des récepteurs ruraux sensibles le long de la voie ferrée, référence, mesures d'atténuation mises en œuvre à ce jour - Jocelyn Bertrand</p> <p>- Surveillance et déclaration des émissions de GES et Mise à jour sur le Plan de gestion de l'utilisation des ressources et de l'efficacité énergétique (RUEEMP) - Alexis Soumah / Saran Camara</p> <p>Salle de Conférence Extension - KAMSAR</p>	<p>Jocelyn Agassimou Mansare Alexis Saran</p> <p>Pause café 10 personnes</p> <p>Noémie</p>	<p>Voyage de Conakry à Kamsar</p> <p>Service Voyage Kamsar</p>	<p>Vincent</p>	<p>- Discussion sur le mécanisme de gestion des réclamations des travailleurs, le programme de logements sociaux - Naby Moussa Sylla</p> <p>- Discussion sur la mise en œuvre du CMP et des fournisseurs en mettant l'accent sur le travail et les conditions de travail - Naby Moussa Sylla / BIS</p> <p>Salle de Conférence DG - KAMSAR</p>	<p>Naby Moussa Sylla BIS Sarah Arabiou</p> <p>Chiara / Anna</p>	<p>Pause café 10 personnes</p>	<p>- Questions sur les présentations sur les griefs et le PAR de Hamdallaye, les ressources, le cadre de suivi, la rémunération et la mise à jour des conclusions.</p> <p>- Point sur les actions de l'atelier de réinstallation (base de données et atténuation des réinstallations passées) - William Nianogo / Carine Gracia</p> <p>Salle de Réunion HSECO - KAMSAR</p>	<p>William Carine</p> <p>Pause café 10 personnes</p> <p>Go to Sangarédi</p> <p>Prisca / Adrien</p>	<p>Johny Isiaga Traoré</p> <p>Adam / Miguel</p> <p>Véhicule Johny Véhicule Service Voyage Chauffeur Bilo Diallo 623233867</p>
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Déjeuner au restaurant - Chacun à son rythme d'avancement des présentations

Repas au labo pour 10 personnes

MARDI 14 13H - 16H	<p>Salle de Conférence Extension - KAMSAR</p> <p>- Mise à jour du MOC - Youssef Kaba</p> <p>VISITE DE SITE - KAMSAR</p> <p>- Visite de l'usine de traitement des eaux usées (et finalisation de la construction du troisième module de traitement) - Aliou Bah / Jocelyn Bertrand</p>	<p>Jocelyn Agassimou Aliou Bah</p> <p>Véhicule Jocelyn Véhicule Saran</p> <p>Noémie</p>	<p>VISITE DE SITE - KAMSAR</p> <p>- Tora Bora - Sekou Sano / Mme Dramé</p> <p>- Site MDR- Sekou Sano / Mme Dramé</p> <p>- Zone de triage/guillage - Sekou Sano / Niankoye Haba</p> <p>- TA10 et autres tours similaires - Sekou Sano / Mamadou Kaba Baldé</p>	<p>Sekou Sano Mansare Mme Drama Haba Kaba Baldé</p> <p>Véhicule Mansare Véhicule Sano</p> <p>Vincent</p>	<p>VISITE DE SITE - KAMSAR - Départ 11h00</p> <p>- Rencontre avec une communauté du port (Iles) - Ahmadou Habib Diallo / Asmaou Bah</p>	<p>Sarah Habib Asmaou Emile Conseiller SST</p> <p>Chiara</p>	<p>Vedette à obtenir de la part du Commandant du Port</p>	<p>TRAJET POUR SANGAREDI</p> <p>- Visite des PAP LRP Phenix sur la route de Sangarédi et autour de Sangarédi - William Nianogo / Carine Gracia</p>	<p>Equipe William (4 personnes) Carine</p> <p>Prisca / Adrien / Anna</p> <p><i>Eau et jus dans les véhicules pour 5 personnes</i></p>	<p>Véhicule William Véhicule Carine</p> <p>Quick update from biodiversity team (30 min)</p> <p>Visit of less successful rehabilitation areas - Johny</p> <p>Salle de Conférence Laboratoire - SANGAREDI</p>	<p>Equipe Johny (4 personnes)</p> <p>Pause Café 10 personnes</p> <p>Adam / Miguel</p>
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Diner au restaurant - Heure de leur convenance

Diner à Sangarédi - Club Oasis

MERCREDI 15 Mai 2024

Petits déjeuner dans les villas

Petit-Déjeuner au RBQ

MERCREDI 15 MAI 08H - 10H	<p>Voyage à Sangarédi par bus</p> <p>Visites sur la route</p> <p>- Logements Sociaux Madina Borloff - Syndicat / Naby Moussa</p> <p>- Camp CRCC - Abdelkader Masri</p>					<p>Bus Coaster Chauffeur : Ibrahima Sory Diallo (624253328)</p> <p>Véhicule Saran Véhicule Sano Véhicule Jocelyn Véhicule MU (jusqu'à Tinguilinta)</p> <p><i>Eau et jus dans les véhicules</i></p>	<p>Abdelkader Ahmadou Barry Habib Asmaou BIS Sano Jocelyn Agassimou Arabiou Saran</p> <p>Chiara / Anna Noémie / Louis Vincent</p>	<p>RESETTLEMENT</p>	<p>RESPONSABLE LOGISTIQUE</p>	<p>BIODIVERSITÉ</p>	<p>RESPONSABLE LOGISTIQUE</p>
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MERCREDI 15 MAI 11H - 13H	<p>Discussion sur les ressources en eau des communautés : Fassaly Belendéré et les cas de l'eau potable de Fassaly Foutabéhé - Habib Diallo / Algassimou Diallo / Jocelyn Bertrand</p> <p>Discuter des progrès accomplis dans la mise en œuvre et la divulgation des données de surveillance environnementale participative - Asmaou Bah / Algassimou Diallo / Jocelyn Bertrand</p> <p>Salle de Conférence Laboratoire - SANGAREDI</p>	<p>Jocelyn Algassimou Arabiou Saran Habib Asmaou</p> <p>Noémie Louis Chiara Anna</p>	<p>Pause café 10 pour personnes</p>	<p>Visites de Site - Sangarédi</p> <p>- Dynamitage - Surface miner - Chargement et pesée des wagons (Aguibou) Alsény Conté / Sékou Sano</p>	<p>Alsény Conté + Equipe Sékou Sano + 1</p> <p>Vincent</p>	<p>Véhicules à déterminer par Mr Conté</p>	<p>Discussion sur les ressources en eau des communautés : Fassaly Belendéré et les cas de l'eau potable de Fassaly Foutabéhé - Habib Diallo / Algassimou Diallo / Jocelyn Bertrand</p> <p>Discuter des progrès accomplis dans la mise en œuvre et la divulgation des données de surveillance environnementale participative - Asmaou Bah / Algassimou Diallo / Jocelyn Bertrand</p> <p>Salle de Conférence Laboratoire - SANGAREDI</p>	<p>Jocelyn Algassimou Arabiou Saran Habib Asmaou</p> <p>Noémie Louis Chiara Anna</p>	<p>Pause café 10 pour personnes</p>	<p>Sangarédi</p> <p>- Mise à jour avec Phénix - Visite avec 'Expertise Sud' des PAP à Hamdallaye et Fassaly - Rencontre avec 2 communautés : une avec le comité LRP d'un village impacté par le plateau de Thiapikouré ou de Koobi + un village impacté par le plateau de Mbouroré ou de Kagneka (pas Guéguéré, Mbouroré ou Kagneka que nous avons visité récemment)</p>	<p>Equipe William (4 personnes) Carine</p> <p>Prisca / Adrien</p>	<p>Véhicule William Véhicule Carine</p> <p>Eau / Jus / Sandwich dans les véhicules pour 10 personnes</p>	<p>In Sangarédi: Kagneka plateau biodiversity protection measures - Johnny Rabenantoandro</p> <p>TLMP actions on the ground - Johnny Rabenantoandro</p>	<p>Equipe Johnny (4 personnes)</p> <p>Adam / Miguel</p>	<p>Véhicule Johnny Véhicule Service</p> <p>Eau / Jus / Sandwich dans les véhicules pour 10 personnes</p>
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Déjeuner au laboratoire de chimie Sangarédi - 20 personnes

ENV	RESPONSABLE	LOGISTIQUE	SST	RESPONSABLE	LOGISTIQUE	SOCIAL	RESPONSABLE	LOGISTIQUE	
MERCREDI 14H - 17H	<p>Visite de site - Sangarédi</p> <p>Visite de la station d'épuration de Cogon Visite de la station d'épuration de Sangarédi - Algassimou Diallo / Jocelyn Bertrand</p> <p>- Visite d'une communauté à proximité de la mine où des données de surveillance environnementale participative ont été effectuées Tely Boli (à confirmer) - Habib Diallo / Jocelyn Bertrand</p>	<p>Jocelyn Algassimou Arabiou Saran Habib Asmaou</p> <p>Noémie Louis Chiara Anna</p>	<p>Bus Coaster</p>	<p>Visites de Site - Sangarédi</p> <p>- Site MDR - Madariou Barry - Atelier Véhicules tours - Zone de triage/aguilage - PCC Alsény Conté / Sékou Sano</p>	<p>Alsény Conté + Equipe Sékou Sano + 1</p> <p>Vincent</p>	<p>Véhicules à déterminer par Mr Conté</p>	<p>Visite de site - Sangarédi</p> <p>Visite de la station d'épuration de Cogon Visite de la station d'épuration de Sangarédi - Algassimou Diallo / Jocelyn Bertrand</p> <p>- Visite d'une communauté à proximité de la mine où des données de surveillance environnementale participative ont été effectuées Tely Boli (à confirmer) - Habib Diallo / Jocelyn Bertrand</p>	<p>Jocelyn Algassimou Arabiou Saran Habib Asmaou</p> <p>Noémie Louis Chiara Anna</p>	<p>Bus Coaster</p>

Dîner à Sangarédi - Lieu à déterminer en fonction du nombre

Jeudi 16 Mai 2024

Petit-Déjeuner à Sangarédi - RBQ

ENV	RESPONSABLE	LOGISTIQUE	SST	RESPONSABLE	LOGISTIQUE	SOCIAL	RESPONSABLE	LOGISTIQUE	RESETTLEMENT	RESPONSABLE	LOGISTIQUE	BIODIVERSITÉ	RESPONSABLE	LOGISTIQUE
JEUDEI 16 MAI 8H00 - 9H30	Discussion sur la procédure de LDP (Kagneka Plateau and Mbouroré) - Equipe complète													
Salle de Conférence Laboratoire - SANGAREDI														
JEUDEI 16 MAI 10H00 - 12H30	Trajet Retour Bus pour les préteurs Véhicules CBG pour les équipes													
JEUDEI 16 MAI 12h 30- 13h 30	Dejeuner au restaurant													
JEUDEI 16 MAI 13:30 - 15:00	Finalisation de la présentation de clôture par l'équipe Ramboll (sans CBG)													
ENV	CBG/IESC	SST	CBG/IESC	SOCIAL	CBG/IESC	RESETTLEMENT/Biodiverty	CBG/IESC							
JEUDEI 16 MAI 15:00 - 16:00	<p>Présentation de clôture aux équipes</p> <p>Salle de Réunion Extension 1er étage - KAMSAR</p>	<p>Equipe Environnement</p> <p>Noémie / Louis</p>	<p>Présentation de la présentation de clôture aux équipes</p> <p>Salle de Conférence HSEC - KAMSAR</p>	<p>Equipe SST</p> <p>Vincent</p>	<p>Présentation de la présentation de clôture aux équipes</p> <p>Salle de Conférence DG - KAMSAR</p>	<p>Equipe Sociale</p> <p>Chiara / Anna</p>	<p>Présentation de la présentation de clôture aux équipes</p> <p>Salle de Conférence DG - KAMSAR</p>	<p>Equipe Resettlement</p> <p>Prisca / Adrien</p>	<p>Présentation de la présentation de clôture aux équipes</p> <p>Salle de Conférence Extension - KAMSAR</p>	<p>Equipe Bio</p> <p>Adam / Miguel</p>				
JEUDEI 16 MAI 16H00 - 17H00	Réunion de clôture - <i>Close-Out Meeting</i> Amphithéâtre - KAMSAR											Pause café 30 pour personnes (Croissant)		
Dîner de Groupe avec Equipe CBG au Restaurant														
Vendredi 7h:00	Retour sur Conakry par BUS													

APPENDIX 2
ISSUES CLOSED IN THIS MONITORING VISIT

Status of issues raised in the previous site visit reports and closed during this site visit monitoring report are listed below

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Status and comments
Nov 2023_EN_006	Water Quality - Kamsar WWTP	<p>The WMP Action Plan includes specific actions relating to use of an untreated effluent bypass at the Kamsar WWTP outside of emergency situations. Investigations have confirmed direct discharge of untreated sewage water to the estuary only occurs during high rainfall events because of rainwater ingress to the sewage drainage network.</p> <p>CBG is constructing a third treatment module at the existing sewage treatment plant, minimising the need for rain fed effluents to bypass the WWTP.</p>	3	<p>A flowmeter should be installed to monitor the frequency of discharge events and volume of untreated water discharged to the estuary. Monitoring should confirm no discharge of untreated sewage water during normal operating conditions.</p>	Minor	Closed (flow meters have been installed at both Sangarédi and Kamsar WWTPs)
Nov 2023_HS_005	Monitoring and review	<p>Incident Investigations and Root Cause Analysis after the last major accident that occurred on 15 September 2023: derailment of train N°418 at PK18.4.</p>	2	<p>CBG should investigate the trains and wagons' condition.</p> <p>CBG should include the results of last railway inspection as part of the investigation of the PK18.4 incident (the investigation report of the incident doesn't specify the date or the aspects checked during the last inspection on PK18.4).</p> <p>Recommendation n°4 of the report (regarding communication between workers on or near the railway and the train drivers) should be examined in more detail and moved to actions table. This</p>	High	Closed (actions completed or initiated)

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Status and comments
				point is little detailed, although it was identified as critical by the IESC during this and previous visits (findings Nov 2023_HS_002 and March 2022_023).		
Nov 2023_HS_007	Risk Assessment at the Kamsar plant	Re-assess the risks in tower TA10 (arrival of conveyor C12) and in other buildings with the same activities	2	Dust and noise should be monitored to define appropriate PPE and strengthen collective protection. Update the Job Safety Analyses regarding new PPE and collective protection in these buildings.	High	Closed - A new conveyor C12 was installed, and tower TA10 is now equipped with two new vacuums to capture dust emissions at the source
Nov 2023_RE_001	Human Resources	CBG has hired a "Resettlement Specialist" rather than a "Resettlement Manager" as expected by the Lenders. While the IESC understand that the Specialist has some managerial prerogative, this title may be an obstacle for internal and external influence.	PS5	Either grant the title Resettlement Manager to the new resettlement specialist along with managerial powers/responsibilities as per the expansion ESAP or seek a derogation/acceptance from the Lenders.	Minor	Closed (following Lenders' agreement with new position title)
Nov_2023_BI_001	Integrated Landscape management Plan (ILMP)	The ILMP (ESAP Item 28) is with CBG to finalise and sign off. There are no outstanding issues from the IESC or Lenders. A final version needs to be issued to sign off the ESAP item and it understood that this is to be provided on 1st March 2024.	6	The final ILMP should be issued as soon as possible and certainly by the date indicated to allow the actions within it to progress An update on progress with commencement of actions should be provided during the next site visit.	High	Closed – plan issued and accepted by IESC – ESAP item 28 closed.

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Status and comments
Nov 2023_SOC_003	Grievance management	No updates on the progress of grievance management is observed in several grievances though recorded in early or in the middle of 2023 - e.g. January 2023 (1 grievance), in February (1 grievance), and in July (multiple grievances).	1	CBG to ensure that updates are provided on all the grievances within the community grievance register.	Minor	Closed. The Q1 2024 grievance register has been updated considering IESC's recommendation. Only 4 grievances have not been updated and there will be follow-up to check progress, Due to the progress observed the IESC deems this item can be closed.
Nov 2023_SO_007	Community Health and Safety - Railroad Safety	New community roads at the mine have been built by CBG in line with community consultation, and security posts were observed by the IESC to have been installed at the intersections; however, the intersection of haul roads and some old community roads were observed unguarded, with increased risk of incidents involving communities.	4	CBG should therefore ensure to close access to the old community roads, particularly if not guarded.	Moderate	Closed. Superseded by May 2024_HS_006.
Nov 2023_RE_003	Social Impact Assessment	Grievances and concerns of the communities around land take impacts and living condition raises the question of the effectiveness of the social impact assessment and agreements with the communities around mitigation measures in the	1	Review the existing E&S impact assessment process in the LDP and/or in the LRP process and update if necessary to include a more comprehensive assessment and community validation when opening a new Plateau.	High	Superseded by May 2024_RE_006

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Status and comments
		LDP and/or LRP process for new Plateau opening.				
June 2023_002	IsoMetrix	CBG to ensure that IsoMetrix becomes a tool to monitor appropriate implementation of relevant ESMPs (e.g. SEP, Grievance Management Plan) and workflow proposed therein. This includes reporting of KPIs.	1	Templates and monitoring system to reflect workflow and timelines included in relevant ESMPs.	Minor	Closed. IsoMetrix Customization is underway although delayed. This finding has been Superseded by item Dec 2022_004.
June 2023_006	Risks and impacts	Numerous findings from Kamsar plant (waste storage workplace, Conveyor project) and active mine (heavy vehicles workshops)	2	<ul style="list-style-type: none"> • Waste storage workplace (Tora Bora) <ul style="list-style-type: none"> ○ Check the emergency kit on site and add fire blanket ○ Managed incinerator when is opened to cool down • Conveyor project <ul style="list-style-type: none"> ○ Add slings to the list of lifting equipment daily inspected ○ Improve and communicate the location of the assembly point ○ Check whether employees are aware of the excavation risks • Heavy vehicles workshops <ul style="list-style-type: none"> ○ Clarify the strategy for the CBG Take5 booklet 	Moderate	Closed. CBG has made the changes at Tora Bora and at heavy vehicles workshops. The conveyor project is finish

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Status and comments
				<ul style="list-style-type: none"> ○ Perform an H&S inspection to identify risks Sharing and raising awareness all employees of the rules regarding lifting equipment		
June 2023_010	Workers Engaged by Third Parties_Contractor Management		2	A rapid audit of working conditions of security guards (and other local contractors) is to be conducted as a priority to verify any non-compliances/opportunities for improvements in terms of labour and working conditions.	High	Closed Inspections of contractors is ongoing.
June 2023_015	Water usage and wastewater production at Kamsar plant	The water flow processed by the OWS was not known as upstream uses as these were not measured in a systematic way.	PS3	It is recommended to install water meters at the main contributors to wastewater production (locomotives cleaning station, and power station). This will help CBG to further understand water consumption on site, and draft water saving strategies.	Minor	Closed
June 2023_019	Surface water discharge - Kamsar	The drainage system for the surface water and stormwater at the Kamsar site showed high sediment and oil concentrations in the past. To resolve the issue CBG undertakes a few actions, among which the cleaning of the surface water drains on a regular basis. However, the IESC fears the cleaning activities	3	An engineering solution such as the installation of sediment traps at outlets must be found to effectively reduce the suspended sediments in the effluents.	High	Open (CBG should investigate cause of exceedances and put in corrective actions as a priority).

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Status and comments
		would potentially resuspend settled sediments, thus not reducing the suspended sediments at the outlets.				
June 2023_033	Hamdallaye and Fassaly Fouthabé RAP	The ToRs for an LRP extension are being drafted. One of the lessons learnt from CECI LRP Program and other LRP programs going on is an increasing demand for additional support not planned and a difficulty for PAPs to understand the extend of CBG commitments.	PS5	Clarify the commitments and criteria of success for the LRP extension with PAPs	Moderate	Closed
June 2023_044	Rehabilitati on	CBG reached the notable milestone of over 1,000 ha rehabilitated. The efforts so far under the Five-Year Rehabilitation Plan have been good and remain on target. The plan is intended to reduce the total area of un-rehabilitated, open land within the concession. The success of the rehabilitation areas, in terms of tree survival and growth rates is monitored as part of the Five-Year plan. Now, after reaching the 1,000 ha milestone and at the end of the third year of planting under that plan, is an ideal time to develop a clear overview of the status.	6	Provide any monitoring data on the status of rehabilitated areas. This can include areas rehabilitated prior to the current five-year plan, areas completed as part of the plan, and areas of additional rehabilitation within buffer areas. The most useful way to deliver this may be visually in the form of maps, potentially colour coding by success criteria, areas damaged or destroyed following community activity etc. but it is for CBG to confirm approach and success criteria. This should be provided ahead of the next site visit in order for the IESC to focus the site visit on key areas.	Minor	Closed

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Status and comments
Dec 2022_002	Organizational capacity and competence - staff resources	The CR team remains unchanged since the previous IESC site visit [prior to Dec 2022] despite recruitment of new staff for the CR team is underway.	1	New personnel to be appointed as a matter of priority.	Moderate	Closed - CBG has appointed new personnel reaching the 2023's target and is committed with appointing new personnel for 2024 year.
Dec 2022_006	Organizational capacity and competence - training	The 2023 Training Plan does not contain provisions for a dedicated training session on Gender Based Violence and Sexual Harassment (GBVSH).	1	Training on Gender Based violence and Sexual Harassment to be included and provided as part of CR team's 2023 training plan.	Minor	Closed. The training has been implemented.
Dec 2022_007	Organizational capacity and competence - training	Current version of the 2023 Training Plan targets the Social team only (i.e. CR and resettlement); no training on social matters is planned at present for colleagues from other departments.	1	Development of a programme for periodic, internally-led training and awareness-raising events targeting other departments is still required to align current practices with the requirements of the IFC Performance Standards (an ESAP requirement).	Minor	Closed. It is understood training program involving other departments is underway.
Dec 2022_008	Stakeholder Engagement	The 2022-2025 SEP is yet to be finalized and disclosed because it is subject to ongoing review by Lenders.	1	CBG (and Lenders) to ensure that the SEP is finalized and disclosed as a matter of urgency. In the interim, the previous version of the SEP should remain publicly available on CBG's website.	Moderate	Closed. (SEP finalized; and disclosed online.)

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Status and comments
Dec 2022_015	Community Grievance Mechanism	A number of 2020 and 2021 grievances are still open.	1	CBG to strengthen the capacity of the monthly HSECQ committee meeting to act swiftly to ensure that there are no institutional 'obstacles' to swift action in terms of: i) recognizing the legitimacy of the grievances; and then ii) putting in place the actions to close them as soon as possible	High	Closed. The IESC understood that HSECQ committee has been revitalized and highlights of complaints are presented and discussed.
Dec 2022_020	Community Grievance Mechanism - Doléances	The complaint (doléance) register should be improved to better keep track of the time it takes to manage communities' requests and to better inform about the doléance status.	1	Updated Doléance register	Minor	Closed. The register has been updated including the dates when the request has started to be managed.
Dec 2022_042	Fassaly Fouthabé	Fassaly Fouthabé has officially requested to be resettled.	5	Prepare a long-term assessment of the situation of the cumulative impacts of mining and hauling around Fassaly Fouthabé using ArcGIS, consult with the community and make a decision to respond to the request.	High	Superseded (see May 2024_RE_001)
Dec 2022_043	Hamdallaye and Fassaly Fouthabé RAP - Livelihood Restoration	Current activities do not meet their intended objectives	5	<ul style="list-style-type: none"> Acknowledge the reluctance of members to continue with the bakery, small ruminants and grasscutter (in Hamdallaye for the latter) and consult with Community to close these activities. Maintain market gardening and poultry activities but rethink model, and potentially finding a partner. 	High	Closed

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Status and comments
				<ul style="list-style-type: none"> Broaden the scope of livelihood restoration to more non-agricultural activities. Target the youth through employability and vocational training.		

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
March 2022_004	SEP and Grievance Management Mechanism	The 2022-25 SEP and GMM need to be revised by CBG as per the IESC's/Policy Lenders remarks.	1	CBG to revise and update SEP and GMM as per the IESC's remarks. <i>Post visits note: Draft SEP and GMM updated and near finalised.</i>	Moderate	Closed. It is understood SEP and GMM has been finalized in February 2024.
March 2022_008	Risk Management and Control of Work	Low control of OHS risks during the execution of tasks, as confirmed by numerous findings during site visits (including in relation to blasting operations, surface miner, traffic on the mine, railway, waste storage (Torabora), lifting operation on jetty, Kamsar Plant)	2	<ul style="list-style-type: none"> Blasting operation: An official and more-structured control system (including a checklist for the contractor and checklist for CBG) should be established for use before and after blasting and kept on site. CBG need to confirm that all personnel present at the mine are aware before validating the blasting. Traffic on mine: Physical separations between community traffic lanes and mine haul roads need to be provided whilst clear markings/signs, informing individuals of the danger and prohibition to cross, need to be established/installed. Road signs for 	High	Superseded by item May 2024_HS_006 for traffic on mine The contractor used a radio to communicate and inform the PCC: the contractor and the regulator at the PCC follow a procedure to confirm that messages have been received by all personnel present at the mine at the time of blasting.

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				<p>mine trucks need to be reinforced and a way to improve drivers' knowledge of the traffic plan needs to be identified and implemented.</p> <ul style="list-style-type: none"> • Kamsar Plant: CBG should complete operational procedures where these are missing, such as for the BuMS. As well as prepare baseline operational risk assessments, prepare a risk register and communicate these to all personnel (both direct employees and contractors). The MUOA Project risk register should also be updated. <p>CBG should prioritise completing a man-machine interface risk assessment and implement appropriate engineering and administrative controls to achieve safe segregation of pedestrians and mobile machinery/equipment at Kamsar and Sangarédi.</p>		<p>Baseline operational risk assessments and a risk register exist at Kamsar and H&S communications are regularly made to all personnel (direct employees and contractors).</p>
Dec 2022_025	OHS system	Lack of follow-up to the multiple action plan(s) may result in the reoccurrence of similar serious events (fatalities, fatigue and maintenance management)	2	<p>Mine haul roads:</p> <ul style="list-style-type: none"> ○ Include the road sections intended for communities in the traffic management plan (manage road signs and guard to discourage continued use of haul roads). ○ Improve the working conditions of guards and control the application of CBG rules by contractors. <p>Mine control centre (PCC):</p> <ul style="list-style-type: none"> ○ Decide on the effectiveness of the facial recognition devices for deployment to 	High (Moderate in isolation and High collectively)	<p>Superseded by Mai 2024_HS_006 for Mine haul roads PCC: The facial recognition system has deployed. Driver breaks are checked by the PCC, particularly at night</p>

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				<p>all vehicles or to investigate an alternative device.</p> <p>Considering a way to control of drivers' schedules and break times between shifts.</p>		
March 2022_010	Maintenance & Asset Management	Poor maintenance of equipment (safety technologies upgraded slowly).	2	CBG should review maintenance and asset integrity in detail (including electrical installation and moving/rotating equipment).	High	Closed The IESC does acknowledge significant progress in the planned maintenance/repair of the Dryers following a comprehensive external audit of these assets in 2022/early 2023.
March 2022_028	Hamdallaye Resettlement Site	Drainage issues partially fixed but some problems remain, resulting in localised flooding, with potential damage to structures as a result	5	Monitor potential flooding during the rainy season and plan corrective works accordingly	Minor	Closed
Oct 2021_009	Female participation in stakeholder meetings	Since 2020, CBG has implemented actions to increase female attendance and participation in community-focused meetings. To date, success has been limited though insufficient time has passed to provide a definite conclusion.	1	<p>Consider implementing one or more of the following options:</p> <ol style="list-style-type: none"> 1. Identifying informal/formal female associations in the villages such as womens' farming/gardening groups and then organizing meetings; 2. Organizing meetings in the fields where groups of women may be working together (in rest periods and not interfering with work regimes); and 	Moderate	Closed. IFC Advisory training done and female participation increased by means of focus groups discussion and regular community engagements. The IESC close this item but will monitor

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				Random walks in villages and to/from agricultural areas to engage in informal conversations with individuals or small groups of women		additional actions undertaken to increase female participation following IFC's Advisory training.
Oct 2021_011	Grievance mechanism	Current planned training on the grievance mechanism is expected to occur in Q3 and Q4 of 2021. These dates are not aligned with the dates for finalization and dissemination of the SEP 2022 -2025	1	Enter into discussions with IFC Advisory to re-schedule the training 'Management of Grievance Mechanism' so that it is delivered at dates soon after the revised grievance mechanism is finalized and disseminated	Moderate	Closed. (IFC Advisory training has been implemented)
Oct 2021_024	N&V impacts	<p>Review of noise and vibration management has identified the following issues:</p> <ol style="list-style-type: none"> 1) Noise monitoring has been hampered by broken and malfunctioning equipment/software. 2) Monitoring at specific sensitive locations along the railway has not occurred. 3) There has been repeated exceedances of airblast overpressure limits in 2020. 	4	<p>Confirmation of the efficacy of measures put in place is required as follows:</p> <p>Article I. Expedite receipt of ancillary equipment and initiate use of the new noise meters at the earliest opportunity.</p> <p>Article II. Further monitoring is required at specific sensitive locations along the railway. Noise and vibration measurements should be taken at a setback distance from the railway line that is equivalent to that of the sensitive receptors.</p> <p>Article III. CBG should engage with potential affected residents at these locations to determine the level of disturbance currently caused.</p> <p>CBG should confirm through monitoring data that measures to meet airblast overpressure limits have been successful</p>	Moderate	<p>Partially Closed (items struck out are considered closed)</p> <ul style="list-style-type: none"> • Noise meters arrived • New monitoring locations along railway <p>Additional overblast data is encouraging)</p>

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Oct 2021_027	Energy efficiency/GHG emissions	CBG is refining its SOP for GHG emission monitoring and reporting.	3	IESC recommends that GHG emissions reporting data is broken down such that fuel use/GHG emission can be normalised (tonnes CO2/unit of bauxite produced) and attributed to the different users of the railway (under the MUOA)/consumption of electricity by communities in Kamsar and Sangarédi. The methodology for apportioning GHG emission to different users can be detailed in the revised SOP. Visiting vessels (e.g. dredgers) with their own fuel source should also be captured in the GHG emissions calculations.	Minor	Open. Superseded by May 2024_EN_001
Oct 2021_038	Monitoring (CRPF)	CBG has developed preliminary framework for monitoring. This framework is not consistent with the "Monitoring" chapters in the CRPF and the LRPs, and, also, it mostly focuses on progress indicators and not outcomes	5	Refine the monitoring system (indicators, methods, frequencies) on the basis presented in the CRPF and the baseline sections of the LRPs (taking into account the generic Policy Lender/IESC comments [18 October 2021]), on the Kankalaré RLRAP), (ii) distinguish progress from outcome (or impact) indicators and (iii) create a dedicated monitoring function within the team and resource it accordingly (at minimum, one full-time staff member)	High	Closed
March 2021_008	Social Management Plans	Certain Plans were approved in early 2019 and have a 2-year review cycle (except for the Local Content Plan which is to be reviewed, "...as appropriate"). Given the challenges that have emerged in implementing the actions; these reviews provide an opportune moment for a comprehensive evaluation of the	1	Unamended Plans to be reviewed and updated in line with the 2-year review cycle. In this context, the CR team to evaluate and amend the Plan actions and timescales, as necessary, considering both the results to date from implementing the existing actions and, also, emerging issues that necessitate adding new actions. The amended Plans /Action Plans must identify priority time-critical actions.	Moderate	Closed. This item as the plans were update/produced

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
		continuing relevance of all actions, especially, those actions that are continuous or on-going.				
March 2021_022	Integration of LWC requirements in bid evaluation and contractor management	<p>Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are:</p> <ul style="list-style-type: none"> • Considered in the bid evaluations and contractor selection process, especially structured participation in the Evaluation Committee; • Presented in future reviews and potential changes to the 'Minimum Requirements' (and therefore included with RfPs); and <p>Integrated into the design and implementation of a monitoring/auditing process, focused upon contractor performance, plus inputs to corrective actions and judgements on 'close out'.</p>	PS2	<p>CBG to ensure that:</p> <ul style="list-style-type: none"> • The bid evaluation process is amended so that the HR Department receives all bids in advance of Evaluation Committee meetings, participates in the Evaluation Committee meetings and is a signatory to the Committee's decision/s; • HR Department to designate a senior staff member to receive PS2 training to assist it fulfil its role in both the contractor selection process and subsequent contractor management (latter issue to be examined in the next IESC site visit); • All requirements to be placed on contractors to be consolidated into the Contractor Management Plan at the next review and revision of this Plan (with removal of LWC provisions from the Local Content Plan); and <p>The HR Manual, WGM and Code of Ethics to be provided in all RfPs.</p>	Moderate	<p>Closed.</p> <p>The Contractor Management Plan is now in place and contains requirements contractors must follow. With the progress made and CBG starting more systematic inspections, this item can be closed.</p>
July 2020_007	Stakeholder Engagement Plan (SEP)	<p>The SEP is dated 2016 and is time-bound (however, with a flexible date for revision/updating, "<i>The SEP will be updated subsequent to completion of the phase 2 ESIA</i>"). In line with the SEP expectation, it was revised to incorporate the MUOA Project in June 2020. Given that the SEP has been in force for almost 5 years, it is now</p>	PS1	<p>Revise/update and re-issue the SEP. This revised/updated SEP should be clearly time-bound (January 2022 to December 2025) and disclosed publicly.</p>	Moderate	<p>Closed</p> <p>SEP for 2022-2025 finalized and disclosed in February 2024.</p>

ID	Aspect	Issue Description	Performance Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
		necessary for an overall SEP revision/update to occur.				

APPENDIX 3
STATUS OF ESAP ITEMS (AS OF MAY 2024)

	<u>Theme</u>	<u>Required Action</u>	<u>Date</u>	<u>Indicator of Completion</u>	<u>Status</u>
1	Operation HSEC-MS	Develop a route map outlining major milestones (based upon actions, timeframes, and interim deliverables), to bring operations up to a level consistent with IFC Performance Standards.	10 Business days after receipt of comments from IESC/Policy Lenders.	Gap Analysis	Closed
		This route map will be informed by a 'stand-alone' gap analysis with respect to current systems and any additional items required for IFC compliance, and, also, recommendations arising from work done to implement the other ESAP actions	31/01/2022 (draft) 31/03/2022 (final)	Route Map	Closed
		Align HSEC MS for existing operations with HSEC MS for the Expansion Project and bring current operations up to a level consistent with the intent of the IFC Performance Standards	31/01/2024	Evidence of HSEC MS aligning with HS	Open (residual actions remain open and subject to a waiver))
2	E&S Reporting	Update and amend the structure of the Annual Monitoring Report template, considering Lender/IESC comments, in a form and substance satisfactory to Lenders	18/12/2020	Updated Annual Monitoring Report Template.	Closed
3	Human Resources	Finalize and then disseminate the updated Human Resources (HR) Manual to both direct employees and contractors.	30/10/2020	HR Manual and Workers' Grievance Mechanism	Closed
		Finalize and then disseminate the updated Workers' Grievance Mechanism to both direct employees and contractors.	30/11/2020	Evidence of dissemination to both direct employees and contractors	Closed
4	Human Resources	Finalize the Code of Ethics and Business Conduct	15/11/2020	Code of Ethics and Business Conduct.	Closed
		Disseminate the Code of Ethics and Business Conduct to both direct employees and contractors	18/12/2020	Evidence of dissemination to both direct employees and contractors.	Closed
5	Stakeholder Engagement	Extend and amend the Action Plan for Stakeholder Engagement 2019-2020 through to 31 December 2021 with contents changed, as appropriate, to ensure alignment with the MUOA-amended Stakeholder Engagement Plan.	29/01/2021	Extended Action Plan 2019-2021	Closed
		Disclose MUOA-amended Stakeholder Engagement Plan and amended Action Plan.	10 Business days following the approval of the amended SEP and Action Plan	Evidence of disclosure of MUOA-amended SEP and Action Plan.	Closed

		Revise and update the Stakeholder Engagement Plan to reflect current/future needs and lessons learnt since 2016. The revised and updated Stakeholder Engagement Plan should focus on the period 2022 to 2025 and on improving alignment to IFC standards (for example, the stakeholder analysis/mapping section). The SEP to include a communication program to report back to communities about the results of water and air monitoring.	One month after receiving comments on the draft	SEP (2022 to 2025)	Closed
		SEP (inclusive of all SEP Action Plans) to be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	10 Business days following the approval of the final SEP and Action Plan (2022 to 2025)	Evidence of SEP disclosure.	Closed (disclosed in February 2024)
6	HSECQ Resources	Employ a dedicated full-time Environment Manager. CV to be provided to Lenders for approval on a 'no objection basis' before confirmation of appointment followed by evidence of hiring.	30/11/2020	Evidence of Hiring.	Closed
7	HSECQ Resources	Prepare and implement a Time-bound Recruitment Plan (initially through to mid-2021 (Version 1) and subsequently up to 31 December 2023 (Version 2)) for the Community Relations and Resettlement sections to increase capacity for social risk management and to strengthen management of the grievance mechanism.	30/11/2020	Version 1 Recruitment Plan	Closed
		The Version 1 Plan will include job specifications/SoW for each position in these sections. The Plan will specify urgent hires, including expertise in the following: grievance mechanism implementation, resettlement, stakeholder engagement, livelihood restoration, and data management. Evidence of recruitment to positions to be provided to Lenders.	29/01/2021	Evidence of urgent hires	Closed
		The Version 1 Plan will present commitments to establish framework contract(s) with consultants for regular support in resettlement/livelihood restoration and data management. Scopes of Work for framework contracts to be submitted to Lenders.	30/03/2021	Scopes of Work for Framework Contract(s)	Closed
		The scope of work submission is to be followed by notification of signed contracts.	30/06/2021	Notification of signed contracts	Closed
		The Recruitment Plan will be updated in mid-2021 (Version 2) to cover the period through to end December 2023.	30/08/2021	Version 2 Recruitment Plan.	Closed
8	HSECQ Resources	Prepare and implement a Time-bound Capacity Development and Resource Acquisition Plan for 2020 to 2021 (Version 1) for the Community Relations and Resettlement sections, including resourcing for social risk management teams, purchase of equipment/resources (such as vehicles, GPS handsets, and data management software) and in situ/external training of staff members in use of acquired resources.	20/11/2020	Capacity Development and Resource Acquisition Plan for 2020-21 (Version 1).	Closed

		Prepare and implement a Time-bound Capacity Development and Resource Acquisition Plan for 2021 to 2024 (Version 2) for the Community Relations and Resettlement sections, including resourcing for social risk management teams, purchase of equipment/resources (such as vehicles, GPS handsets, and data management software) and in situ/external training of staff members in use of acquired resources.	30/08/2021	Capacity Development and Resource Acquisition Plan for 2021-24 (Version 2).	Closed
9	Training on Social Matters	Prepare and implement a HSECQ training programme including training on social matters, such as, as a minimum, topics as communication tools, resettlement practices, stakeholder engagement, data management), and management of grievance mechanisms. The training will be aligned with IFC good practice and provided by a specialist external entity.	31/07/2021	Preparation of a social training programme.	Closed
10	Data Management System for Social Risks	Create a specification and complete establishment of a data management system to gather, record and track social-related aspects such as land take, socio-economic information, compensation payments, grievances, stakeholder engagement, compensation agreements, asset inventory.	30/11/2020	Specification for System.	Closed
		The system must allow analysis of trends and root causes with regards to social issues and grievances over time. To provide evidence of the completion of the installation process and performance testing.	29/01/2021	Evidence of completion of installation process and performance testing.	Closed)
11	Area of Influence - GAC Siding	Prepare a Memorandum providing clarification on the status of the 'GAC siding', the environmental and social sensitivities, and impacts and mitigation measures implemented to date/to be implemented by CBG. Any additional mitigation measures shall be incorporated within appropriate E&S management plans (save for those mitigation measures which fall under GAC's responsibility).	18/12/2020	The Memorandum	Closed
12	E&S Management Plans	Update the E&S management plans in sections 12a to 12j to include MUOA amendments.			
12a	E&S Management Plans	Create a Noise and Vibration Management draft of amended plan to reflect noise and vibration assessments reports to be undertaken which determine the incremental impacts from the MUOA Project and define mitigation measures.	15/04/2021	PDN with draft of amended Noise and Vibration Management Plan	Closed
		Update the Noise and Vibration Management Plan based on IESC/Policy Lenders feedback to reflect noise and vibration assessments reports to be undertaken which determine the incremental impacts from the MUOA Project and define mitigation measures.	30 Business days after IESC/Policy Lenders provide feedback on the draft plan	Final Noise and Vibration Management Plan.	Closed

12b	E&S Management Plans	Water Management Plan draft.	31/01/2021	Final Water Management Plan	Closed
12c	E&S Management Plans	Updated Environmental Monitoring Programme	20 Business days after IESC/Policy Lenders sign off on Noise and Vibration Plan (Item 12a)	Updated Environmental Monitoring Programme	Closed
12d	E&S Management Plans	Local Content Plan	31/01/2021	Final Local Content Plan Signed off by IESC	Closed
12e	E&S Management Plans	Cultural Heritage Management Plan	N/A	Cultural Heritage Plan	Closed
12f	E&S Management Plans – Community Development Plan	Draft Community Development Plan. The Plan will include tailored information-sharing approaches and methodologies for disseminating the Plan to targeted communities.	16/06/2020	PDN with draft of amended Plan	Closed
		Review by external third-party consultant of this Community Development Plan. The review will focus on ensuring that CBG's community investment strategy is aligned with IFC best practice. Prepare Scope of Work	18/12/2020	After receiving the Consultant's Scope of Work.	Closed
		SoW for the review to be submitted to the consultant to be approved by Lenders on a 'no objection' basis.	1 Month from bid submission date	Approval on a 'no objection' basis.	Closed
		The Community Development Plan will be revised as necessary, following the review.	31/01/2022	Following the submission of the revised Community Development Plan.	Closed

		The Community Development Plan will be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	10 business days after the IESC/Policy Lenders have approved the revised Community Development Plan	Evidence of disclosure	Closed (with revised summary CDP to be disclosed)
12g	E&S Management Plans	Finalised Influx Management Plan.	15/03/2021	Final Influx Management Plan Signed off by IESC	Closed
12h	E&S Management Plans	Finalised Community Health and Safety Management Plan.	28/02/2021	Final Community Health and Safety Management Plan Signed off by IESC	Closed
12i	E&S Management Plans	Finalised Road and Rail Safety Management Plan.	30/04/2021	Final Road and Rail Safety Management Plan Signed off by IESC	Closed
12j	E&S Management Plans	Finalised Emergency Response Plan.	20/05/2021	Final Emergency Response Plan Signed off by IESC.	Closed
13	E&S Management Plans	i) Prepare an interim Air Quality Management Plan (AQMP) in accordance with the Scope of Work (Ref. AIR QUALITY Scope of Work ver 3). The Interim AQMP will be informed by the 2019 emissions data for Dryers 1-3 (and other sources) and dispersion modelling. The Interim AQMP will also propose stack emission limits and measures necessary to meet proposed limits and will include information on the necessary financial budgets to achieve the requirements within. Proposed emission limits will be agreed with Policy Lenders and the IESC.	(Subject of a waiver – in progress)	Interim AQMP	Superseded (the AQMP is subject to a new action plan and timeline agreed with the Lenders and therefore removed from the ESAP)
		Update the interim AQMP to include consideration of Dryer 4 emissions and additional sampling data collected for Dryers 1-3/other sources as applicable and in accordance with the Scope of Work to produce a Final AQMP.	(Subject of a waiver – in progress)	A Final AQMP	See above

14	Worker Demobilization	<p>Prepare</p> <p>4) Worker Demobilization Plans and</p> <p>5) subsequent Demobilization Close-out Reports, for future demobilization events, focusing on issues such as planning and monitoring procedures used to manage demobilization with emphasis on the process(es) used to notify workers of key demobilization dates, make and record final payments to workers and to manage grievances received and the procedures leading to grievances being closed out.</p> <p>6) Demobilisation requirements should be communicated to contractors via the CBG Contractor Management Plan which should be updated accordingly.</p>	29/01/2021	<p>i) Worker Demobilization Plan</p> <p>ii) Demobilization Close Out Report</p> <p>iii) Communication to Contractors</p>	Closed
15	Pollution Prevention	<p>Repair/upgrade the oil water separator located at the tank farm to achieve compliance with the applicable project standards. Design to be agreed with IESC.</p>	31/12/2022 (Subject of a waiver)	Design Agreed for Pollution Prevention Upgrade/Repair works completed	Closed
16	Community Mobility and Livelihoods	<p>Develop a Scope of Work for an external consultancy and a Request for Proposals issued.</p>	15/11/2020	SoW agreed	Closed
		<p>Commission a study and report to be conducted by a suitably qualified consultant, on the impacts on mobility and road traffic flows (in urban areas) due to increased train movement frequency, including livelihood impacts resulting from alterations to mobility/traffic flows.</p>	24/02/2021	Study commissioned	Closed
		<p>The study report to include recommended measures to mitigate adverse impacts.</p>	30/09/2021	Draft Study	Closed
		<p>Based on the results of the study, CBG shall seek to agree with the Policy Lenders on mitigation measures to be implemented by CBG.</p>	30/10/2021	Signed off by IESC and Policy Lenders	Closed
		<p>CBG to seek the approval of the MUOA User's Committee in accordance with Section 22 of the MUOA to address mitigation measures that need to be implemented (as agreed pursuant to (iv) above), including the roles and responsibilities of each of the parties with respect to such implementation.</p>	30/10/2021	Signed off by IESC and Policy Lenders	Closed

17	Past Compensation Report	Finalize the Past Compensation Report (2010-2015), with recommendations to improve livelihoods of PAPs, which integrates comments provided by the IESC and Policy Lenders. The recommendations will form the basis of an Action Plan to be implemented. This Plan will be included in the final Report.	31/10/2020	Completion of the Past Compensation Report including the Action Plan.	Closed
		The Past Compensation Report, including the Action Plan, will be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	22/01/2021	Evidence of disclosure.	Closed
18	Compensation and Resettlement Policy Framework (CRPF)	Finalize CRPF considering Lenders/IESC comments.	30/06/2021	Final CRPF Produced.	Closed
		Approved CRPF to be disclosed publicly in a form to be agreed between CBG and the Policy Lenders.	10 business days after the IESC/Policy Lenders have approved CRPF.	Evidence of CRPF disclosure.	Closed
19	Kankalaré RAP+LRP	Finalize Kankalaré Resettlement Action Plan (including a Livelihood Restoration Plan). CBG to send a Notification (accompanied with an updated fieldwork schedule), to Lenders, as soon as COVID-19 restrictions are lifted in a manner that allows the required fieldwork to be implemented.	05/03/2021	RAP and LRP	Closed
20	Kankalaré Infrastructure Measures Completion	Provide interim and final report with photographic evidence of the finalization of infrastructure provision/improvement measures in relation to the Kankalaré PAPs' host communities. The measures are road to Parawi village, Telebofi footbridge over the railway; fencing along railway for the stretch where the railway passes beside Telebofi village; and iron-removal devices for wells.	30/11/2020	Interim Report with photographic evidence.	Closed
			31/12/2021	Final Report confirming all works completed.	Closed
21	Post 2016 Resettlement Independent Review	CBG to support the commissioning and execution of a third-party independent review of all land acquisition processes initiated from 01/01/2016 through to effective date of the CRPF (see item 18) and adequacy of related documentation. A Scope of Work to be prepared and approved by Lenders. This independent review will result in a Report focusing on compliance of land acquisition processes against the requirements of the 2016 RPF and PS 5. The Report will identify non-compliances and include a time-bound	31/01/2021	Budget Approval	Closed
			As per the time bound by the Corrective Action Plan	Completion of actions specified in Corrective Action Plan.	Ongoing

		corrective action plan with budget to cover implementation. CBG to complete implementation of the Corrective Action Plan.			
22	Hamdallaye and Fassaly Foutabhé RAP	Prepare and implement a COVID-19 Plan for H2, 2020, with the key aim of ensuring that CECI resumes/increases activities, in agreement with the communities, as soon as possible while respecting governmental restrictions.	16/11/2020	COVID-19 Plan	Closed
23	Hamdallaye: Resettlement Housing and Infrastructure Repairs Action Plan	Prepare and implement a time-bound Action Plan for housing and infrastructure repairs and other additional works related to the Hamdallaye resettlement site.	30/11/2020	Action Plan	Closed
		Environmental Monitoring Programme to be amended to include sampling and analysis of Hamdallaye water supply. Analysis of data, and any corrective actions needed.	See Item 12c	Updated Environmental Monitoring Programme to include water sampling and analysis	Closed
		PAP satisfaction survey to be undertaken upon completion of repairs and works specified in the Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.	As per the time bound by the Corrective Action Plan	PAP Satisfaction Survey Results	Closed
24	Hamdallaye: Land Rehabilitation Action Plan	<p>Prepare (i) and implement a time-bound Action Plan, with biodiversity inputs, to implement the soil rehabilitation programme as per CBG's report (RAP Hamdallaye & Fassaly Foutabhé: Project Status Report, 12 February 2020) including setting up a pilot field to build the capacity of the population on soil fertility management and finalizing the individual allocation of land (ii to iv) to the respective affected people as per the RAP. The Action Plan, also, to include specific rehabilitation measures for:</p> <ul style="list-style-type: none"> - the replacement crop-growing land (56 ha); - all land to be used for land-based livelihood restoration activities; and - land for household gardens and fruit/shade trees. <p>v) PAP satisfaction survey to be undertaken upon completion of measures specified in the Action Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.</p>	30/11/2020	A completed time-bound Action Plan.	Closed
			29/01/2021	Initial evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed
			31/12/2021	Interim evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed
			30/09/2023	Final evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed

			Following implementation of the Action Plan	PAP Satisfaction Survey Results	Open
25a	Economic Displacement (SoW, Plateau LRP)	Prepare and submit scopes of work with respect to the Livelihood Restoration Plan (LRP) in the remaining sections of 25a below.	15/11/2020	Scope of Work	Closed
		Provide confirmation that a Livelihood Restoration Plan (LRP) is being or will be prepared for PAPs and submitted prior to people being displaced in N'dangara, Kagnaka and Parawi by proposed mining activities and haul roads. CBG agrees that no additional land take causing displacement in N'dangara, Kagnaka and Parawi will occur until the LRP has been approved by Lenders.	31/08/2020	Receipt of Confirmation	Closed
		Draft LRP to be submitted for Lender/IESC review.	1 month after receiving lender comments.	Draft and Final LRPs posted by the GFA	Closed
25b	Economic displacement (i) Thiapkhore LRP (ii) Contingency Blocks LRP (iii) IA for contingency blocks (iv) closed	i) Prepare and submit an LRP with respect to PAPs already impacted by displacement in Thiapikouré. This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	15/06/2021	Draft and Final LRP.	Closed
		ii) Prepare and submit an LRP for review and approval by the Lenders with respect to PAPs affected by land disturbance through the streamlined process (Bouroré 1a, 1b & Parawi 2a). This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	Draft 31/08/21 and then 1 month after receiving lender comments.	Draft and Final LRP.	Closed
		iii) As an interim measure, prepare and submit an impact assessment of the economic displacement, for Bouroré 1a, 1b & Parawi 2a, and identification of those PAPs that are most vulnerable and for which transitional support will be provided.	Draft 30/7/21 and then 1 month after receiving lender comments.	Draft and Final Impact Assessment.	Closed
		iv) Formal written commitment by CBG not to disturb land before any LRP is in place.	30/11/2020	Written Commitment	Closed

26	Biodiversity Action Plan	Develop a Biodiversity Action Plan (an update of Biodiversity Management System), including a Biodiversity Monitoring and Evaluation Plan, in alignment with revised Guidance Note 6 (to Performance Standard 6) including development of standard biodiversity metrics for no net loss (NNL)/net gain (NG) of biodiversity; update of estimates of significant residual effects and associated offset targets to considered following completion of the BMS review; presentation of interim targets for NNL/NG; and prioritization of on-site set aside.	22/04/2021	Finalised Biodiversity Action Plan.	Closed
		The BAP will be disclosed publicly, within 2 weeks of its completion, by CBG, in a form agreed between the Policy Lenders and CBG.	30/06/2021	Evidence of disclosure.	Closed
27	Rehabilitation - 5 Year Plan	Prepare a 5-year progressive rehabilitation plan, including resourcing of the biodiversity department, for full land restoration (budget and equipment) and staffing required.	05/06/2021	Final Rehabilitation - 5 Year Plan	Closed
28	Rehabilitation - Landscape Level Plan	Develop a landscape-level plan for the concession, building on the existing Plateau-by-Plateau (PbP) approach, that integrates community development and biodiversity objectives. The intent is to provide strategic guidance to location and focus of rehabilitation, community development, and on-site conservation activities. This plan will require collaboration with affected stakeholders including local governments, representatives of communities/civil society organisations and neighbouring mining companies.	30/04/2021	Agreed TOR for Landscape Plan	Closed
			2 months after approval of the TOR by Lenders	Consultant approved by Lenders.	Closed
		The completion of a final Landscape-Level Plan.	1 month following comments from Lenders	Final Rehabilitation - Landscape Level Plan	Closed

<p>29</p>	<p>Halco E&S Support</p>	<p>CBG to arrange, at the request of any Policy Lender, a call with all of the Halco board members, to be held no more frequently than once per calendar quarter, to discuss the progress of E&S matters, including environmental and social governance matters, relating to the Project. All Lenders and the IESC will be invited to the call. The requesting Policy Lender shall provide a proposed agenda at the time of requesting the call.</p> <p>Calls will be quarterly as requested, to commence at the end of the first calendar quarter following the Effective Date.</p>	<p>30/11/2020</p>	<p>Written confirmation from the CEO of the Halco Board to the Policy Lenders that all Halco board members will participate in update calls to be held no more frequently than once per calendar quarter with the Lenders and IESC on environmental, social and governance matters relating to the Project as requested by Policy Lenders.</p>	<p>Closed</p>
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