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International Finance Corporation; United States International Development Finance Corporation; BNP Paribas; ING Bank, a branch of ING-DiBa AG; Natixis; and La Banque Internationale pour le Commerce et L'Industrie de la Guinée 'BICIGUI SA'

together, the Original Lenders and other Lenders as defined in the common terms agreement dated 2 September 2016 (as amended and restated on 6 September 2017, and as further amended and restated from time to time) to be entered into between, among others, the Original Lenders, the Bank of New York Mellon and Compagnie des Bauxites de Guinée from time to time (the "Common Terms Agreement").

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CBG BAUXITE MINE ENVIRONMENTAL AND SOCIAL MONITORING REPORT – OCTOBER 2021

**CBG BAUXITE MINE
ENVIRONMENTAL AND SOCIAL MONITORING REPORT
– OCTOBER 2021**

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APPENDICES

Appendix 1

Virtual Site Visit itinerary

Appendix 2

Key Project Documentation made available for Review

Appendix 3

Status of Issues Identified in Preceding Monitoring Visits

Appendix 4

Status of ESAP Issues at the time report was drafted.

ACRONYMS & ABBREVIATIONS

AMR	Annual Monitoring Report
ASI	Aluminium Stewardship Initiative
BAP	Biodiversity Action Plan
BGEEE	Bureau Guinéen d'Études et d'Évaluation Environnementale
BMS	Biodiversity Management System
CBG	Compagnie des Bauxites de Guinée
CECI	NGO managing all LR activities, under the Hamdallaye and Fassaly Foutabhé RAP, on behalf of CBG
CFB	Chemin de Fer de Boké
CHMP	Cultural Heritage Management Plan
CR	Community Relations
CRPF	Compensation and Resettlement Policy Framework
CTA	Common Terms Agreement
DFC	US International Development Finance Corporation
DG	Director-General (of CBG)
DMP	Dredge Management Plan
EEM	CBG's Environmental and Social (E&S) Consultants
EHS	Environment, Health and Safety
EMTL	Environmental Monitoring Team Leader (previously the post was referred to as 'Environment Manager')
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
E&S	Environmental and Social
ESMP	Environmental and Social Management Plan
GIS	Geographic Information System
GoG	Government of Guinea
H&S	Health and Safety
HR	Human Resources
HSE	Health, Safety and Environment
HSE&S	Health, Safety, Environment & Social
HSECQ	Health, Safety, Environment, Communities and Quality
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
KBA	Key Biodiversity Area
KPI	Key Performance Indicator
LDP	Land Disturbance Permit
LTI	Lost Time Injury/Incident

AMR	Annual Monitoring Report
LR	Livelihood Restoration
LRP	Livelihood Restoration Plan
LTIR	Lost Time Injury/Incident Rate
LWC	Labour and Working Conditions
M&E	Monitoring and Evaluation
MoC	Management of Change
MoU	Memorandum of Understanding
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 ₂	Nitrogen dioxide
NO _x	Oxides of nitrogen
NGO	Non-Governmental Organisation
N&V	Noise and vibration
NVMP	Noise and Vibration Management Plan
PAP	Project-Affected Person
PbP	Plateau-by-Plateau
PM	Particulate matter
PM ₁₀	Particulate matter 10 micrometres or less in diameter
PM _{2.5}	Particulate matter 2.5 micrometres or less in diameter
PS	Performance Standard
Ramboll	The company fulfilling the role of IESC
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 - Winning Consortium
SO ₂	Sulphur dioxide
SOP	Standard Operating Procedure
tph	Tonnes per hour
TMP	Transitional Measures Plan (MUOA Project)
TRIFR	Total Recordable Injury Frequency Rate
TIFR	Total Incident Frequency Rate
VSV	Virtual Site Visit

AMR	Annual Monitoring Report
WBG	World Bank Group
WMF	Waste Management Facility
WMP	Water Management Plan
WWTP	Wastewater Treatment Plant

EXECUTIVE SUMMARY

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 'Expansion Project'), Guinea.

In fulfilling the role of 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 construction of the Phase 1 Expansion and/or during the Sangarédi to Kamsar railway upgrade 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 a site visit undertaken in October 2021, however, due to COVID-19 related travel restrictions in force at this time and some security concerns¹, travel to the CBG site was not possible. The IESC, therefore, undertook a Virtual Site Visit (VSV), basing its findings on remote meetings/interviews, document review (received from CBG and third parties) and photographic evidence. A similar virtual approach was adopted for the preceding visits of July 2020 and March 2021.

A series of meetings/interviews were undertaken during the week commencing 4th October 2021. The meetings/interviews were held via conference calls involving representatives from the IESC, CBG and the Policy Lenders. To the extent possible, CBG presented photographic evidence and presentational material in support of its HSE&S performance in addition to supporting documents and other materials in response to information requests made by the IESC/Policy Lenders. In addition, the IESC was able to draw upon the information contained in the 2020 Annual Monitoring Report (AMR), received in April 2021 shortly after the March 2021 VSV, and the Borrower's Quarterly E&S Compliance Certificates for Q1 and Q2 2021.

The preceding March 2021 VSV Monitoring Report highlighted meetings with the Hamdallaye Resettlement Committee and selected members of Hamdallaye-based Income-Generating Activity (IGA) groups that could not take place at the time and were deferred to a later date. The IESC originally intended to reissue the March 2021 IESC Monitoring Report with an Addendum to summarize the findings from these meetings. However, these meetings took place later than envisaged on 03 August 2021. Given the proximity of this date to the October 2021 VSV, it was decided to capture follow-up on issues, raised during the meetings, via the October 2021 VSV. Therefore, this report provides the update on these meetings.

During the VSV, the following topics were investigated:

- HSE&S:
 - The implementation of the Environmental and Social Action Plan (ESAP);
 - CBG's response to COVID-19 and the implications of COVID-19 for CBG's operations;
 - The adequacy of the HSE&S Management System(s);
 - The Management of Change Procedure;
 - The implementation of the suite of E&S management plans intended to address applicable Project Standards, notably the IFC Performance Standards;

¹ Security concerns following a military coup in September 2021.

- Follow-up on those ‘open’ issues identified during previous site visits;
- CBG supervision/monitoring of the SMB (Société de Minière de Boké) railway² and the COBAD road;
- Contractor management;
- Environmental management (air, water, waste, hazardous materials, noise and vibration);
- Dredging;
- Resource use and energy efficiency; and
- North of Cogon (NoCo) exploration;
- Labour and working conditions (LWC):
 - Occupational health and safety;
 - Dissemination of HR Manual, the Workers’ Grievance Mechanism (WGM) and the Code of Ethics and Business Conduct to employees and contractors/sub-contractors;
 - The Workers’ Grievance Mechanism; and
 - Inclusion of CBG’s Labour and Working Conditions (LWC) requirements and local content into contractor and sub-contractor contracts;
- Stakeholder engagement:
 - Community Relations Team: staffing and resources
 - Scope and focus of stakeholder engagement;
 - Female participation in consultation meetings;
 - Management of community grievances; and
 - Management of community requests for assistance (*doléances*);
- Community health and safety:
 - Blasting Protocol;
 - Communicable disease prevention;
 - Health infrastructure;
 - Security; and
 - Rail and community health and safety;
- Biodiversity:
 - Biodiversity inspections;
 - Biodiversity Action Plan;
 - Five-year Land Rehabilitation Plan; and
 - Offsets (on-site and off-site); and
- Resettlement issues:
 - Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP): implementation Status;
 - Livelihood Restoration Plans (LRPs) - completed or in preparation;
 - Cumulative impacts;
 - Resettlement-related grievance management;

² A Memorandum has been signed between SMB-W, CBG, the Ministry of Mines and Geology and the Ministry of Environment, Water and Forests, with respect to the 10 km of railway SMB-W is constructing in the CBG Concession area (South Cogon). Under this agreement, CBG’s undertakes regular inspection reports, which focus upon SMB-W’s performance against the applicable HSEC standards, which are then submitted to BGEEE (agency under the Ministry of Environment, Water and Forests). Only BGEEE has the right to enforce compliance.

- Monitoring; and
- Resettlement implementation capacity.

As indicated above, the VSV focused upon a broad range of topics. CBG has a team of HSECQ specialists (the 'Community' component of HSECQ includes both community relations (CR) and resettlement teams) that are working to implement actions specified in applicable management plans and to satisfy the requirements of the ESAP. Throughout the VSV, CBG cooperated fully and responded to the IESC's requests in relation to its monitoring work.

A total of 43 new or updated findings (with accompanying recommendations) were identified during the VSV. Of these 13 are considered to have a 'High' significance; 19 are of 'Moderate' significance and the remainder are of 'Minor' significance. The High and Moderate findings relate to the timing/urgency/compliance of necessary actions and are listed below. In some instances, High/Moderate findings are repeats of the same or similar findings made in previous IESC monitoring reports. Where this is the case repeat findings are indicated with an '*'. Any change in significance on an issue is also highlighted where such a change is applicable.

High significance findings

1. *Functioning of the community grievance mechanism.* The community grievance mechanism is not functioning effectively (low annual number of grievances recorded for past five years). It is recommended that the community grievance mechanism be reviewed and revised, as appropriate, within the context of preparation of the Stakeholder Engagement Plan (SEP) 2022-2025. The revised community grievance mechanism will exclude resettlement-related grievances as a separate grievance mechanism for these grievances will be prepared.
2. *Resettlement-related grievances.* Very few resettlement-related grievances appear to be logged and managed. It is recommended that CBG reviews the grievance management system, separating resettlement- and compensation-related grievances from other community grievances, and to identify issues in the grievance logging process (specifically reviewing the role of inventory consultants, who appear not to log grievances during their field activities, as well as the role of CBG/contractor field staff).
3. *H&S Performance.* Three worker fatalities have occurred in 2021 (two were shortly following the VSV). A detailed review of H&S practices and performances will be undertaken by an IESC H&S specialist during the next site visit. The review shall examine adequacy of training programmes, procedures, the influence of hierarchy (related to stop work authority), implementation of procedures and 'on the ground' practices across CBG operations and activities in order to identify opportunities for system and/or behavioural improvements. In the interim CBG should identify the reasons why health and safety rules have been breached and opportunities to eliminate the occurrence of similar breaches in the future. CBG should also identify opportunities to improve the H&S Management System/H&S Procedures.
4. * *Integration of Labour and Working Conditions requirements in bid evaluation and contractor management.* Currently, there is no clearly defined role or pathway by which the Human Resources (HR) Department can provide its oversight to ensure that LWC requirements are:
 - 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 HSE Requirements' (and therefore included with all Requests for Proposals (RfPs)); and
 - 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'*.

It is recommended that CBG ensures that:

- 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;
- All requirements to be placed on contractors to be consolidated into the Contractor Management Plan at the next review and revision of this Plan or by end Q1, 2022, whichever is the earliest (with removal of LWC provisions from the Local Content Plan); and
- The HR Manual, Workers' Grievance Mechanism and Code of Ethics to be provided in all RfPs.

5. * *Contractor management and the Integrated Management System.* The Contractor Management Plan is not being implemented in full. In addition to initiatives currently being implemented by CBG to rectify identified deficiencies the IESC further stresses the importance of a comprehensive and targeted audit of contractors against the requirements of the CMP, including audit of both contractors' H&S documentation (pre and post contract award) and actual safe working practices on the ground.
6. * *Air Quality – finalisation of AQMP.* CBG was unable to complete wet season stack emission testing in 2021. Consequently, it is unable to meet the timeframes specified in the ESAP for finalisation of the AQMP. CBG to agree an extended timeframe for the finalisation of the AQMP with Lenders. The agreement might include conditions and/or interim deliverables, noting that interim stack emission limits for the bauxite dryers could be derived using the 2021 dry season emissions data, Dryer 2-4 operating parameters and ambient air quality data that is due to be available in early 2022.
7. * *Poor performance of the oil/water separator.* Despite a number of successful interventions, oil concentrations in treated effluent leaving the oil water separator located in Kamsar continue to consistently exceed the applicable IFC standard. A rapid intervention plan to achieve compliance in the shortest timeframes possible should be presented to Policy Lenders and the IESC. This should include consideration of readily available containerised/skid mounted oil treatment equipment that can be hired on a short-term lease until a permanent engineered solution is in place. In addition, CBG shall:
- provide its monthly oil in water monitoring results for the treated effluent to Lenders in order to demonstrate short term actions are effective
 - report progress on the interventions scheduled for Q4, 2021

Any changes to the timeframes specified in the ESAP relating to the OWS must be agreed with Lenders.

8. *Fatalities of community members with mental health problems in Kamsar.* There has been more than one rail-related fatality involving a community member with a mental health problem in recent years. CBG to consider and identify, in conjunction with the operator of the treatment centre (traditional healer), feasible measures (both 'soft' and 'hard') aimed at reducing the risk of rail-related fatalities involving his patients and then consolidate the measures into an action plan to be implemented as soon as possible after the plan is agreed.
9. *Fassaly Foutabhé - Cumulative land disturbance and environmental impact and village viability.* The Fassaly Fouthabé community has expressed concerns as to the long-term viability of the village in its current location. A long-term cumulative assessment of the future impact of mining activities on the Fassaly Fouthabé community is needed with community consultations on the findings. CBG to identify other 'at risk' communities and undertake similar cumulative impact assessments.
10. *Delays in implementing livelihood restoration (LR) activities.* LR activities have been delayed and/or protracted and there is a need for stronger coordination within CBG to reduce LR timeframes. CBG to consider appointing a strong implementation partner to coordinate all LR activities within one or several Livelihood Restoration Plans and procure one competent implementation partner for each

broad activity (e. g. agriculture, income-generating activities, livestock, business development, etc.) and for all plateaux.

11. *Adequacy of the preliminary framework for monitoring livelihood restoration.* This framework is not consistent with the “Monitoring” chapters in the current version of the draft Compensation and Resettlement Policy Framework (CRPF) and the LRPs, and, also, it mostly focuses on progress indicators and not outcomes. CBG to (i) 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 provided 18 October 2021), on the Kankalaré Resettlement and Livelihood Restoration Plan), (ii) distinguish progress from outcome (or impact) indicators and (iii) create a dedicated monitoring function within the team and resource it accordingly, since there is virtually no monitoring going on at the moment for lack of resources.
12. * *Resettlement implementation capacity.* The Resettlement Team remains understaffed in the opinion of the IESC. The planned recruitment of a new staff member and the expansion of external support by the end of 2022 will help but is unlikely to address the gap in implementation and monitoring resources, as outlined in previous occasions by the IESC. CBG to:
 - Create operations and monitoring/evaluation positions within the Resettlement Team and make appointments as a priority; and
 - Seek to appoint females to the team.
13. * *Procurement for resettlement needs.* Procurement of required goods and services is not meeting resettlement needs cost-effectively and delivery of assistance to affected individuals, households and communities is delayed. HSECQ and Procurement and Logistics departments should establish a small working group to adapt the current procurement procedure by creating i) a means of accelerating resettlement-related requirements and ii) designing a ‘fast track’ route for high priority requests.

Moderate significance findings

1. * *Management of Change.* The Management of Change (MoC) Procedure is not being applied consistently across CBG’s operations. CBG is therefore developing an Action Plan to improve understanding and use of the MoC Procedure across its activities. CBG to finalise the MoC Action Plan and roll out the measures therein as a matter of priority. The Owner of the Procedure/Action Plan and MoC Coordinator to be appointed with ultimate responsibility for full implementation of the requirements set out in the MoC Procedure.
2. *Community Relations team recruitment: database specialist.* The appointment of the Database specialist by the end of Q3 2022 and the expectation that IsoMetrix will be functioning fully by end of Q1 2022 means that there will be a six-month period when IsoMetrix will not be used to its full potential. CBG to consider bringing forward the appointment of Database specialist so that the gap between the Database specialist being employed and a fully-functioning IsoMetrix is reduced to the maximum extent possible.
3. *Community Relations team: training.* Several training events have been delayed by potentially up to one year and this provides an opportunity for the Community Relations Manager to consider actions to improve training outcomes while minimizing disruption to workloads. CBG to consider planning and organizing staff time so that there is minimum disruption to workloads while fulfilling training commitments. Possible options include:
 - Careful selection of personnel to be attending specific training events, scheduling events so that one event immediately follows another (‘back-to-back’ sequencing) and providing incentives for some training to be undertaken outside standard working hours;
 - Applying the ‘train the trainer’ model where only one or two staff members attend a training event and then they train their colleagues on the key principles and/or practices in shorter subsequent training events; and

- In the context of future training needs for the period 2023 - 2024; selecting fewer key training topics/events (perhaps a maximum of 10 topics/events).
4. * *Implementation of Environmental Management Plans and Procurement.* The planned revision of certain Environmental Management Plans is overdue and actions specified within Action Plans (incorporated within the Management Plans) are behind the original schedule. A significant contributory factor to the delays has been CBG's slow procurement process for goods and services. CBG should conduct a review of its procurement process to identify opportunities to expedite procurement of goods and services across all E&S disciplines.
 5. *North of Cogon exploration.* Contractors are likely to require temporary rights to use/occupy land for facilities such as, but not limited to, fly-camps and laydown areas. CBG to ensure that contractors acquire agreements, with all affected land rights-holders, for use and/or occupancy of land for facilities in a PS 5-compliant manner.
 6. *Grievance mechanism.* 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. CBG should therefore 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
 7. * *Dredging.* The 2021 dredging campaign did not strictly adhere to certain actions set out in the Dredge Management Plan. In particular, deficiencies were observed in terms of: 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. Stricter adherence with all applicable the requirements of the DMP is required in order to confirm impacts from dredging are known and minimised where necessary.
 8. * *Female participation in stakeholder meetings.* Since 2020, CBG has implemented actions to increase female attendance and participation in community-focused meetings, but with limited success. CBG to consider implementing these options:
 - Identifying informal/formal female associations in the villages such as women's farming/gardening groups and then organizing meetings with such groups;
 - Organizing meetings in the fields where groups of women may be working together (in rest periods and not interfering with work regimes);
 - Providing gender sensitivity training to staff; and
 - Random walks in villages and to/from agricultural areas to engage in informal conversations with individuals or small groups of women.
 9. * *Land Rehabilitation and Relinquishment.* CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues. Work should 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 Mine Rehabilitation and Conceptual Closure Plan, relevant to mined land rehabilitation and relinquishment.
 10. *Management of suppliers.* The roll-out of LWC requirements does not yet extend to suppliers. CBG to design 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).
 11. * *Environmental Monitoring Programme.* CBG has been unable to implement its Environmental Monitoring Programme in full for a number of reasons, including most notably a lack of an external laboratory for complex analyses and limited in house equipment/analytical capabilities. At the time of reporting, contracts with external laboratories were either signed or signature was imminent.

Further effort is required to ensure full implementation of the EMoP and monitoring components of the environmental management plans, including:

- Finalisation of outstanding contracts with external laboratories;
- Procurement of a data management system;
- Undertake a resourcing Needs Analysis to determine current and future resource and training needs; and
- Disclosure of monitoring results to affected communities in an appropriate and meaningful format.

12. *Water quality -mine effluents.* A spring used by Fassaly Foutabhé community members appears to have been contaminated by CBG's mining activities. CBG should investigate the causes of the contamination and, if confirmed 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.
13. * *Noise and Vibration.* Review of noise and vibration management has revealed that: noise monitoring has been hampered by broken and/or malfunctioning equipment/software; monitoring at specific sensitive locations along the railway has not occurred; and there were repeated exceedances of airblast overpressure limits associated with blasting events in 2020/early 2021. Further noise and vibration monitoring is required at specific sensitive locations along the railway at a setback distance from the railway line that is equivalent to that of the sensitive receptors. CBG should also confirm through monitoring data that its measures to meet airblast overpressure limits have been successful.
14. * *Waste management.* Progress in the implementation of the waste management Action Plan continues, however a significant number of actions are no longer relevant or behind the original schedule specified in the Action Plan. The Waste Management Plan should be updated to reflect CBG's current waste management strategy, including the potential use of Bendougou waste facility and the longer-term strategy following end of the Tora Bora waste facility's design life. Also, the Community Relations team should engage with the affected community members prior to recommencing transportation of wastes to the Bendougou facility.
15. *Community health and safety -installation of footbridges (passerelles) and fences.* Communities and local governments wish the following installation sequence to be followed: the passerelles to be open for public use before the fences are 'closed'. Engineering supervision should focus closely upon ensuring that each contractor is aware of the sequencing of the passerelles/fences and that regular supervision checks are made to ensure that the sequence is being applied.
16. * *Fassaly Foutabhé school.* The Fassaly Foutabhé school is still not yet staffed more than 12 months following its construction. CBG should continue to liaise with "Inspection académique" (local education directorate responsible for provision of teachers) to ensure allocation of teachers to the school.
17. *Hamdallaye and Fassaly Foutabhé grievances/doléances.* During IESC meetings on the 03 August 2021 with the Hamdallaye Resettlement Committee and selected members of Hamdallaye-based Income-Generating Activity (IGA) groups, a wide range of issues, concerns and requests were raised by community representatives many of which do not appear in the grievance and *doléance* registers. Issues/concerns/requests raised by participants should be logged within the grievance/*doléance* management system so that they can be tracked and closed.
18. * *Hamdallaye livelihood restoration.* Previous recommendations to improve CECI's³ work with respect to horticultural/market gardening activities (*maraîchage*) on rehabilitated land have not been implemented adequately. CBG to:
 - Strengthen CECI's agronomic expertise; and

³ CECI is CBG's implementing partner for the LR component of the Hamdallaye and Fassaly Foutabhé RAP.

- Ensure, before inception of the dry season gardening period, that gardening group members are properly prepared for the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know how to do basic maintenance of drippers.

19. MUOA Livelihood Restoration Plan. This LRP was approved in September 2020 and procurement of an implementation partner is only expected to be completed by Q4, 2021; thus, no LR activities have been initiated, for approximately 400 PAPs, within the past 13 months. CBG must expedite appointment of an implementing partner.

The findings presented in this VSV report should be incorporated within CBG's audit findings and closure process, with evidence of corrective actions submitted to the Lenders and the IESC via established ongoing liaison channels.

Of note, status updates are provided in the main body of this report for certain legacy findings; however, this is not the case for all legacy findings (where updates are not warranted). Thus, there are some historical issues, which are not highlighted in the main body of this report, that need to be fully closed. Such 'open' legacy issues are tabulated in Appendix 3.

The status of all items listed in the ESAP is provided in Appendix 4. The status is constantly changing as CBG progresses with the finalisation of ESAP items. Thus, the update provided in this report reflects the status in February 2022, the time this report was drafted.

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. 006-V1), dated 9th October 2020. However, due to the aforementioned travel restrictions caused by the COVID-19 pandemic, coupled with heightened security uncertainties at the time, the IESC was unable to visit the CBG site and face-to-face meetings/interviews with third parties. The IESC was unable to undertake ground truthing of its findings and instead has relied on information provided by CBG, including photographic evidence and third-party documentary evidence.

1. INTRODUCTION

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 'Expansion Project'), Guinea.

In fulfilling the role of 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 construction of the Phase 1 Expansion 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 health, safety, environmental and social 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 provides the findings of a monitoring visit undertaken in October 2021, however, due to COVID-19 related restrictions in force at this time and security concerns, travel to site was not possible. The IESC therefore undertook a Virtual Site Visit (VSV), basing its report findings on remote meetings/interviews and document review and photographic evidence provided by CBG. A similar approach was adopted for the preceding July 2020 and March 2021 monitoring visits.

A series of technical meetings/interviews were undertaken during the week commencing 4th October 2021. The meetings/interviews were held via conference calls involving representatives from the IESC, CBG and the Policy Lenders. To the extent possible, CBG presented photographic evidence and presentational material in support of its Health, Safety, Environment & Social (HSE&S) performance in addition to supporting documents and other materials in response to information requests made by the IESC/Policy Lenders. Also, the IESC was able to draw upon the information contained in the 2020 Annual Monitoring Report (AMR), received in April 2021 shortly after the March 2021 VSV and the Borrower's Quarterly E&S Compliance Certificates for Q1 and Q2 2021.

This report provides the findings following the VSV. The VSV focused upon an assessment of CBG's HSE&S performance against Project commitments made in E&S Management Plans, the Environmental and Social Action Plan (ESAP), loan agreements and applicable Project Standards, specifically, IFC Performance Standards (PSs) and applicable World Bank Group (WBG) Environmental, Health and Safety (EHS) guidelines.

As mentioned above, the IESC was unable to visit CBG's facilities which prevented face-to-face meeting/interviews with stakeholders and inspection of facilities for ground-truthing purposes. Whereas this is clearly not ideal, the IESC was able to hold detailed technical discussions with CBG representatives. Such meetings were held, primarily, with CBG staff from the HSECQ department as follows:

- 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 Manager and team members; and
- Community Relations (CR) Manager and team members.

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

- Human Resources;
- Compliance;
- Mining;
- Fire Department;
- Phase 1 Expansion Project (in relation to Dryer 4); and
- Chemin de Fer de Boké (CFB) in relation to the MUOA Project.

Finally, the opportunity was taken during the VSV to hold an alignment Ccall to discuss the draft MUOA Community Mobility and Livelihoods Report and the work to be done to prepare the final version of the report. This Ccall involved members of the CR team, representatives from other CBG Departments including CFB, the MUOA team, and the authors of the report (Royal HaskoningDHV).

A team of four from the IESC, accompanied by E&S specialists from IFC, DFC and UFK, participated in the VSV meetings to assess CBG's HSE&S performance, including progress towards meeting the requirements of the Environmental and Social Action Plan (ESAP) (as amended in September 2021).

Throughout the VSV, the IESC team was granted full access to CBG documentation and received good cooperation from the CBG HSECQ Department/other departments. Members of the IESC/Policy Lender team split into sub-teams to focus on the team members' disciplines, namely: i) HSE (excluding biodiversity); ii) biodiversity; iii) social (excluding resettlement); and iv) resettlement. This report presents key VSV findings in sections that align with those IFC PSs that are applicable to CBG's operations. More specifically the IESC held detailed discussions on the following topics:

- General:
 - Status of the Phase 1 Expansion and MUOA projects;
 - HSECQ structure and resourcing;
 - Measures in place in response to protect the CBG workforce and communities from COVID-19;
 - Status of the SMB Rail construction (within CBG's South of Cogon concession);
 - Status of COBAD Road Operations (within CBG's South of Cogon concession); and
 - Current short-term mine plans and proposed CBG exploration activities within both the South and North Cogon concession areas; and
- HSE:
 - Status of HSE Management Systems;
 - H&S metrics and performance;
 - Audit and inspection programme;
 - Implementation of Management Plans, including those relating to: Emergency Response, Air Quality, Noise and Vibration, Waste, Hazardous Materials, Dredging, Resource Use and Efficiency, Water Quality, Environmental Monitoring and Contractor Management;
 - Management of Change (MoC); and
- Social:

- CR/ Resettlement personnel resourcing/capacity development and performance of the recently installed IsoMetrix software platform for managing social and biodiversity risks;
- Labour and working conditions (LWC) with focus on dissemination of key documents (HR Manual/Worker Grievance Mechanism /Code of Ethics) and management of employment-related grievances⁴;
- Community health and safety (H&S); including communicable diseases, health infrastructure and rail-related H&S issues;
- Blasting at the mine;
- Scope and focus of stakeholder engagement
- Community grievance/doléance⁵ management; and
- Resettlement:
 - Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP): implementation status;
 - Livelihood Restoration Plans (LRPs) - status;
 - Cumulative impacts;
 - Resettlement-related grievance management;
 - Monitoring; and
 - Resettlement implementation capacity; and
- Biodiversity:
 - Biodiversity inspections;
 - Biodiversity Action Plan (BAP);
 - Five-year Land Rehabilitation Plan; and
 - Offsets (on-site and off-site).

The VSV itinerary is provided in Appendix 1.

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

⁴ The HR Surintendant (Superintendent) could not attend the meeting and certain topics could not be discussed. Post-VSV follow-up questions were sent to the HR Surintendant and written answers received.

⁵ *Doléances* are community requests for assistance (such as improving a road, building a clinic, and providing a new well for water).

2. SCOPE AND STRUCTURE OF THE REPORT

2.1 VSV Scope

As a condition of the Common Terms Agreement (CTA), CBG is required to appoint an IESC to monitor (audit) and report on the implementation of the ESAP and compliance with the applicable IFC PSs and E&S commitments and in doing so, present E&S risks associated with the Expansion Project, the MUOA Project and CBG's wider operations. This report has been prepared for the attention of CBG and Lenders.

The report presents the findings of the VSV based on information gained following:

- A review of ESAP implementation;
- A review of certain HSECQ Management System documents;
- Review of the 2020 AMR (received after the preceding VSV in March 2021);
- Review of recent Borrower's E&S Compliance Certificates for Q1 and Q2 2021;
- Interviews held with key HSECQ staff within CBG; and
- Interviews with other CBG functions.

The preceding March 2021 VSV Monitoring Report highlighted meetings with the Hamdallaye Resettlement Committee and selected members of Hamdallaye-based Income-Generating Activity (IGA) groups that could not take place at the time and were deferred to a later date. The IESC originally intended to reissue the March 2021 IESC Monitoring Report with an Addendum to summarize the findings from these meetings. However, these meetings took place later than envisaged on 03 August 2021, with the IESC representative participating via a video conference call. Given the proximity of this date to the October 2021 VSV, it was decided to capture follow-up issues, raised during the meetings, via the October 2021 VSV. Therefore, this report provides an update on these meetings.

A full list of Project documentation reviewed during preparation of this report is provided in Appendix 2.

2.2 Project standards

In accordance with the IESC's Terms of Reference, 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 PSs (2012):
 - PS1: Assessment and Management of Environmental and Social Risks and Impacts;
 - PS2: Labour and Working Conditions;
 - PS3: Resource Efficiency and Pollution Prevention;
 - PS4: Community Health, Safety, and Security;
 - PS5: Land Acquisition and Involuntary Resettlement;
 - PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; and
 - PS8: Cultural Heritage; and
- WBG EHS Guidelines applicable to the Project.

PS7 (Indigenous Peoples) was excluded as no Indigenous Peoples are affected by the Project.

2.3 Structure of the report

Section 3 provides a very brief description of the Expansion Project status, the MUOA Project and other CBG activities. Section 4 describes how different levels of significance are attributed to issues highlighted in the report. The report is then structured around the seven IFC PSs applicable to the Project, as listed above, and supporting IFC EHS general and sector specific guidelines. The key findings identified during the audit and IESC recommendations to address them are summarised in 'significance tables' for each PS at the end of each chapter.

Appendix 3 provides a status update for the consolidated list of 'open' issues identified in the previous monitoring visits. The status of previously identified issues is categorised as either:

- Closed (with an explanation of the rationale for closing an issue);
- Open (either because no progress has been made or the IESC did not have an opportunity to revisit the issue); and
- Superseded (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 an update provided. In this situation, an update of the issue is provided in the main body of this report, and the previous issue as listed in Appendix 3, will include a reference to this updated text).

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

2.4 Limitations

The IESC was unable to travel to Guinea due to COVID-19 related travel restrictions. Consequently, there has been no in-country visual inspection or ground-truthing to inform this report. Therefore, the findings are based on photographic evidence provided by CBG, review of documentation and meetings/interviews with CBG representatives/other stakeholders.

3. PROJECT STATUS

This chapter provides a brief description of the Expansion Project status, the MUOA Project and other CBG activities ongoing at the time of the VSV.

3.1 Status of the Expansion Project

The IESC's preceding monitoring report (March 2021) reported that construction of the Expansion Project was largely complete and that most of the construction contractors associated with the Expansion Project had left the site. Two activities were reported as ongoing:

1. Construction of additional workforce housing in Kamsar, delayed as a result of COVID-19, was due for completion in June 2021; and
2. Modifications to the new Dryer 4 to increase its throughput capacity to a level closer to the design capacity of 1400 tonnes per hour.

For the latter, at the time of the March 2021 VSV, modifications had been made to increase the lifting capacity in the dryer and adjustment made to the motor torque by adjusting the electrical current on the Variable Frequency Drive (VFD). The IESC previously reported works were completed by end April 2021 with the dryer operating between 1350 to 1450 tph @ 6.7% moisture with inlet moisture of 7.5%. Performance testing was scheduled to occur during the rainy season in August/September when the Dryer would be used at full capacity.



Figure 3-1. Inside of Dryer 4

In October 2021, CBG confirmed that Dryer 4 had achieved 1300-1500 tph at 6.7%, moisture content during the dry season⁶. Following a planned adjustment of the combustion parameters for wet season drying, a wet season performance test was scheduled for September 2021, however the contractor responsible for undertaking the performance test postponed its trip due to the military coup in September. At the time of writing no date was available for the rescheduled visit. Of note, once the 2021 wet season ends, performance testing will not be possible until the following wet season in 2022.

3.2 Status of MUOA Project

During the previous VSV overall progress for the MUOA project was 55%. Progress in October was reported to be 60% complete (as of August 2021) with the same key tasks to be progressed, namely:

- Installation of permanent signalling (at 9.6% progress with a scheduled end date of February 2023); and
- Construction of the locomotive maintenance workshop (schedule end date September 2023).
- 2 locomotives were due to arrive in November 2021 with another 4 locomotives still to be delivered in 2022, under the phase 1 scope.

In August 2021 contracts were in place to complete the permanent signalling (Contractor: Wabtec) and workshop construction activities (Contractor: SETEC).

Other notable activities include:

- Track laying 100% complete;
- 31 community water wells along the length of the railway line have been installed for affected communities (removing the necessity to cross tracks to access water for many people in communities intersected by the railway)⁷;
- Three contracts for the construction of a total of 12 new footbridges have been awarded with end of construction forecast for March 2022; and
- 20 km of fence installation ongoing in parallel with the footbridges (except for fence closure which will only occur once the footbridges are ready for public use).

⁶ At the time of the October 2021 VSV the dryer was achieving approximately 600-800 TPH because it wasn't adjusted for the wet season drying.

⁷ The number of wells sunk by CBG is unclear because contradicting numbers have been provided to the IESC. The actual number will be clarified during the February 2022 site visit.

Planning August -2021

Global Progress: 60%



Figure 3-2: MUOA Project Progress and Revised Schedule, dated August 2021

3.3 Status of South of Cogon activities

During the VSV, the IESC was informed that CBG is revisiting its six quarter (short term) mine plan. This revisit is in part due to a decision taken by CBG management to suspend activities in the Parawi 3a plateau (indicated by red shading).

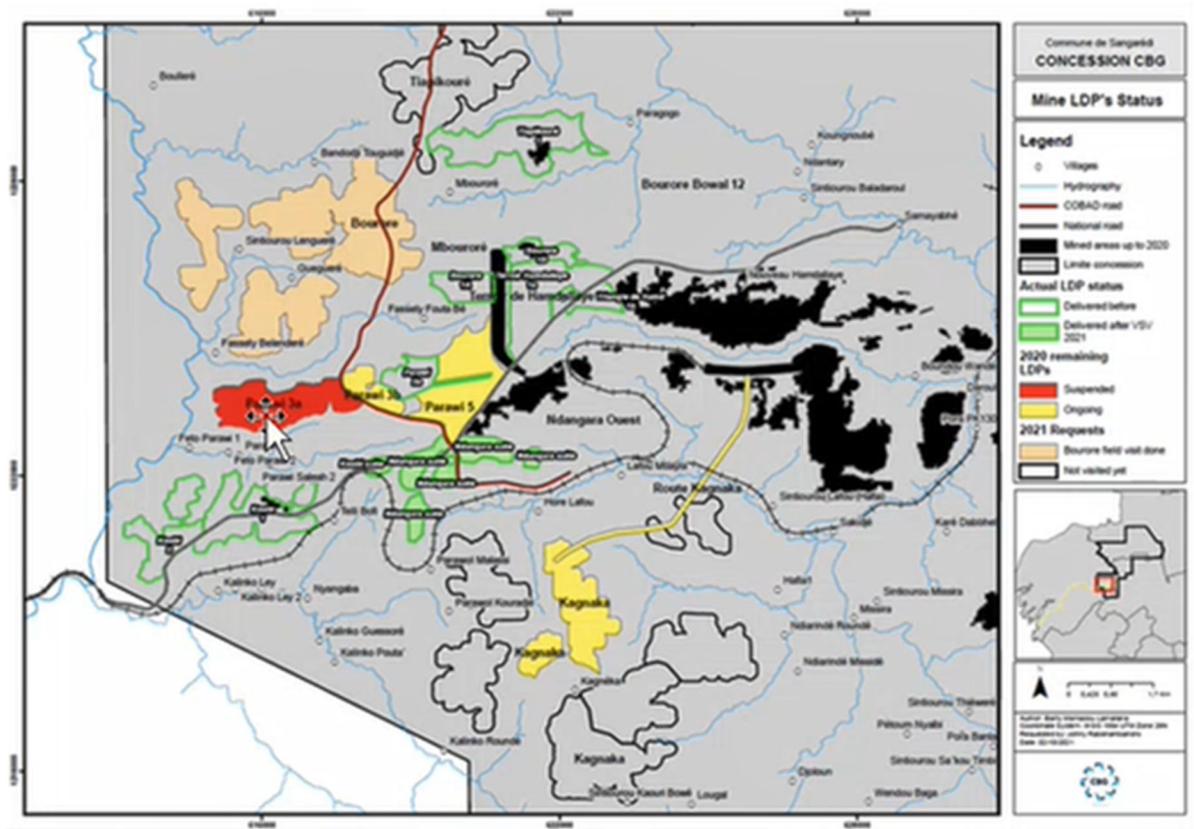


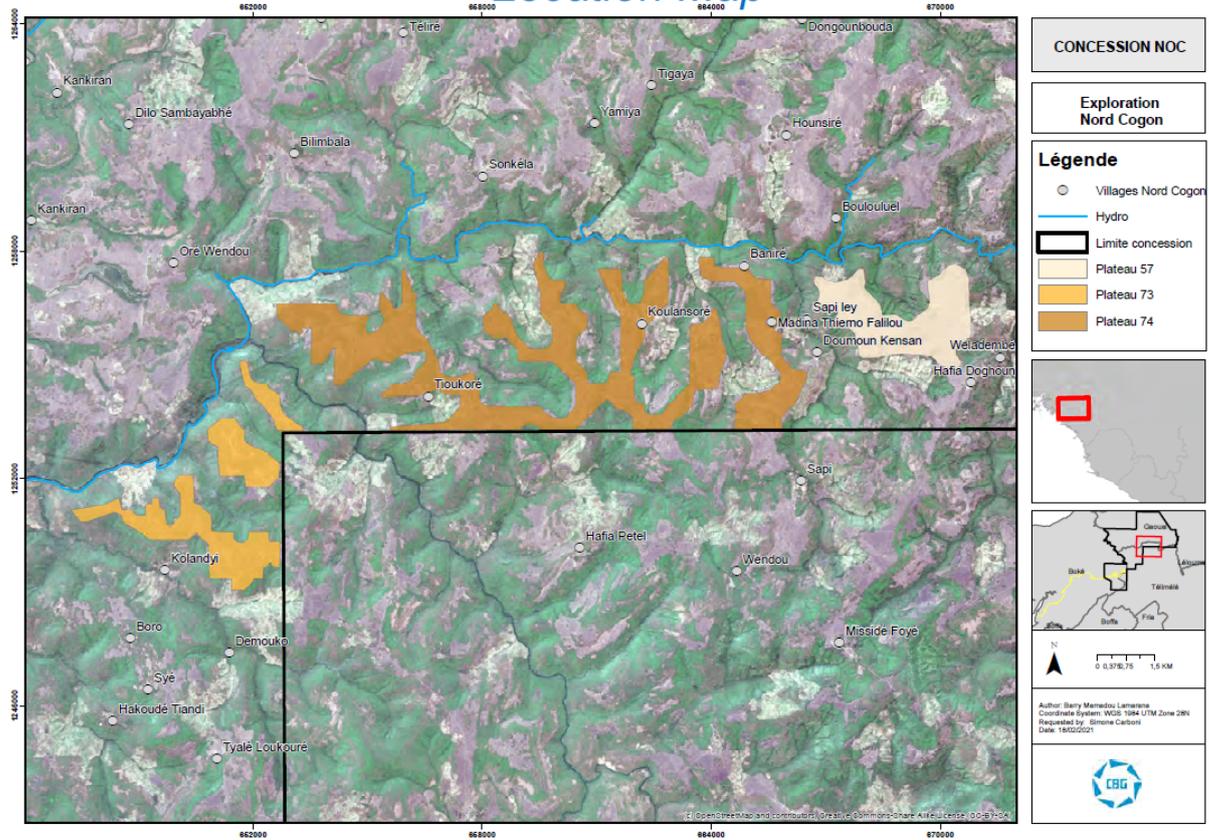
Fig 3-3. South of Cogon Concession showing location of Parawi 3a plateau.

The decision was prompted by the erection of a number of huts and planting of cashew trees following CBG’s announcement to mine the plateau. The decision to suspend activities in Parawi 3a has resulted in CBG revisiting its short- and long-term mining plans, including further consideration on the need to exploit plateaux to the north of the Cogon River.

3.4 CBG activities in the North of the Cogon Concession Area

During the March 2021 VSV, the IESC was provided with information concerning CBG’s preparatory work and subsequent intention to implement an exploration campaign in the concession area located north of the Cogon River (NoCo) over the period 2021 to 2024. Figure 3-4 shows that exploration is planned to be carried out at three plateaux (Ref. 57, 73, 74) located between the villages of Kolodyi and Horé Sapi and there are at least seven villages located on/near the plateaux.

Exploration N. Cogon *Location Map*



Ce document est une propriété de la CBG

Figure 3-4: Location of the three exploration plateaux North of Cogon

During the October 2021 VSV, CBG confirmed that further exploration work remained on hold, and will remain on hold until a Land Disturbance Permit (LDP) is in place. The LDP is expected by the end of 2021; further information concerning the status of the preparatory work to inform the LDP is provided at Section 5.3.2.

At this stage CBG informed the IESC that there has been no decision taken to mine the North of Cogon concession area. Any decision will be taken following extensive assessment of the technical and financial feasibility and then included in a revised Life of Mine plan that would subsequently require agreement with the Lenders. The IESC understands the timeframes are long term and CBG is planning further evaluation to determine whether it will need to go to NoCo prior to 2038. For the short-term, a Project Manager has been appointed to assess the feasibility of NoCo mining; and is working closely with the HSECQ team to ensure E&S considerations are considered in the feasibility studies. In the event NoCo will be mined a full ESIA Report will be produced prior to any mining of the concession area.

4. SIGNIFICANCE ASSESSMENT

4.1 Review findings

A summary of the review findings is presented in a significance table at the end of each PS Section. In the tables each finding is presented as an issue, and the following information is provided (see Table 4-1 below):

- The aspect;
- A description of the issue, for example deficiencies or omissions;
- The project phase(s) to which an issue relates;
- Recommendation, where applicable, to resolve/manage a deficiency; and
- The significance on a three-point scale (see below for criteria for assigning significance).

4.2 Assessment of significance

A ranking system has been used to indicate the relative significance of each issue identified. As well as highlighting the most important areas requiring improvement, it can also be used to aid the tracking and rectification of improvement measures.

Identified issues have been placed into one of the following three categories:

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.

Not Applicable Issue is noteworthy, but not a matter of non-compliance.

Where time-critical recommendations are made a timeframe linked to Construction/Operational phase milestones is indicated in the 'IESC recommendations' column. 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.

Table 4-1: Example of the summary table format

ID	Aspect	Issue Description	Phase ⁸	IESC Recommendations	Sign
00	Storm water run-off – monitoring	The ESAP requires <i>Company X</i> monitors the quality of surface water run-off from facilities. To date the Company has been unable to procure monitoring equipment – no monitoring has been undertaken.	Ops	<i>Company X shall Expedite procurement of monitoring equipment with the support of senior management.</i>	Moderate

⁸ Phases can include construction; operations; decommissioning; or any combination of these phases.

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

5.1 HSECQ Resources

This section provides an update on HSECQ resources, including a discussion around senior HSECQ positions and the CR team. Commentary on resettlement-related resources is included in Section 9.7.

5.1.1 Senior HSECQ positions

At the time of the October 2021 VSV, 4 urgent hires within the Community Relations and Resettlement Teams were in place as reported in the previous VSV report and detailed in the sections below and CBG also had a full complement of senior HSECQ leaders, notably; 1) CR Manager, 2) Resettlement Manager; 3) Environmental and Monitoring Team Leader; and Biodiversity Manager.

The IESC previously reported that the HSECQ Director left CBG shortly following the March VSV. The position was immediately filled by a senior in-house HSEC specialist fulfilling the role of 'Acting' HSEC Director. The same individual continues to be the Acting HSECQ Director.

CBG is currently undertaking a broad review of its HSECQ priorities and resourcing needs via a Gap Analysis and Route Map exercise defined under item 1 of the ESAP. The Gap Analysis and Route Map are being undertaken to bring all CBG operations (not just the Expansion Project and MUOA) up to a level consistent with the intent of the IFC Performance Standards. It is expected that the Gap Analysis and Route Map (action required) to achieve the ESAP objective will inform future resourcing needs. In the interim, CBG has identified immediate resource needs for late 2021 and 2022, including:

- Contractor Management Plan (CMP) Coordinator (see section 5.10 on CMP and Integrated Management System (IMS));
- Additional support from an international consultancy (ACORN), focusing primarily on supporting the Community Relations Team thereby freeing up resource for the CAO mediation process (see Section 5.1.2); and
- A 6-month secondment for an HSE IMS Coordinator (see section 5.10 on CMP and IMS).

Multiple agreements are also in place with external consultancies. These are described in more detail within the sections of this report addressing environmental monitoring, biodiversity, and social management including resettlement.

The IESC has previously highlighted concern about the retention of key specialists and, also, expressed concerns over the contract of the expatriate Resettlement Manager which was due to expire in September 2021 (See March 2021 VSV report), recognizing the ongoing and future resettlement-related workload. The Resettlement Manager was not present during the VSV and his contract reportedly terminated shortly after the VSV. *Post VSV note: the loss of the incumbent Resettlement Manager is viewed as a significant impediment to CBG's ability to manage growing resettlement programmes. However, CBG has been able to quickly secure a replacement specialist. The replacement specialist is seen as a temporary solution whilst a permanent replacement is recruited. The temporary Resettlement Specialist will work on a part time rotational basis travelling between his home country and Guinea basis spending approximately 50%-75% of his time in country through to the middle of 2022. The IESC understands the role will commence in late November 2021. Post VSV note: Confirmed to be in place by early December 2021.*

5.1.2 CR team

The CR team remains effective under the leadership of the CR Manager. The CR Manager has been in post since the first IESC monitoring site visit (November 2016) and this stability in leadership has been a very valuable asset to the team and its work. The Manager has been able to guide the gradual, but steady expansion of the team in a way that is consistent with key emerging needs. *Post-VSV Note: Following the departure of the Resettlement Manager in mid-October 2021, the CR Manager temporarily took over all responsibilities held by the Resettlement Manager until he will be replaced. In late November 2021, a consultant was recruited to support the CR Manager in the management of resettlement activities.*

Staff Resources

At the end of September 2021, the CR team's staff complement remained at nine (same number as at the time of the March 2021 VSV). There are five team members based in Kamsar (including the CR Manager and the CR Superintendent plus a Community Development Co-ordinator and two CR Co-ordinators and four members based in Sangarédi (four Community Relations Co-ordinators). Since March 2021, the CR team in Sangarédi has continued to be supported, on a full-time basis, by a staff member from the Mining Operations section. This staff member has focused mostly on blasting and community sensitization/consultations, but also provides support for other CR team activities.

CBG is finalizing Version 2 of the Time-bound Recruitment Plan 2021-2023 for the CR and Resettlement teams. The current version of this Plan (dated 20 September 2021) includes the following actions/timing for CR personnel resourcing:

- Q4 2021 – completion of transfer of the 'Mining Operations' employee; and
- Q3 2022 – appointment of i) a Community Engagement Co-ordinator to be based in Sangarédi to provide a local managerial presence to ensure maximum effectiveness of the existing Sangarédi-based CR personnel and ii) a Database specialist, to be based in Kamsar, to ensure IsoMetrix⁹ is used to its full potential and, also, to assist the Resettlement team to manage its database. Although in day-to-day working terms, this specialist is a shared resource, the post is assigned to the CR team.

Thus, by end 2021, the CR team's staff complement will be ten and by end 2022, it will be 12, which is an increase of three on its current size.

The appointment of the Database specialist is considerably later than the installation of IsoMetrix. However, given the fact that IsoMetrix is not functioning adequately, the impact of the lack of the Database specialist to date is probably not severe (see sub-section on 'Equipment' below). However, at present, IsoMetrix is expected to be fully operational by the end Q1 2022 and assuming this occurs there will be a six-month period when IsoMetrix will not be used to its full potential. Therefore, it is recommended that CBG consider bringing forward the appointment of Database specialist so that the gap between the Database specialist being employed and a fully functioning IsoMetrix is reduced to the maximum extent possible.

Since approximately July 2021, the CR team has benefitted from consultancy support provided by ACORN International under the terms of a 1-year renewable contract. To date, two consultants are assisting the CR team (one based in Kamsar until end January 2022 and then working remotely and one who was based in Kamsar, during August 2021, and who now provides support from her office base. Both are part-time in terms of the support provided). Their support covers:

- Monitoring of E&S Management Plans;

⁹ IsoMetrix is the software platform for managing social data which was installed in early 2021. Unfortunately, it is not functioning adequately and therefore, not meeting CBG's needs. Action to ensure adequate performance may not be completed until Q2 2022.

- ESAP deliverables; and
- CAO mediation process support.

with reporting to the HSECQ Director for all activities, except for CAO, where reporting is to the CR Manager.

In 2020, the CR team devoted a considerable portion of its stakeholder engagement efforts (41% of all stakeholder meetings) to resettlement issues (the Hamdallaye/Fassaly Foutabhé RAP and the Thiapikouré LRP) and to the MUOA Project (specifically community/local authority meetings related to the installation of rail crossings under the MUOA Transitional Measures Plan). This commitment meant that 59% of all stakeholder meetings were focused on the themes/topics presented in the Stakeholder Engagement Plan (SEP), which reflect CBG's 'day-to-day' operational activities/issues.

For 2021 year-to-date, there has been a major change of focus/emphasis as enhanced engagement on the aforementioned topics was completed. Engagement activities focused upon resettlement planning/implementation (excluding time allocated to resettlement-related grievances) was 12% with MUOA-focused engagement, also, accounting for 12% of all meetings. The remaining meetings all focused upon CBG operations (75%)¹⁰. Of all meeting held to date in 2021, 73% occurred in the mine area, 22% along/near to the railway (not all consultations along/near the railway relate to the MUOA project) and 5% related to the port area (Kamsar). In the future, MUOA- related engagement events are expected to continue to decline as construction activities come to completion.

Currently, and likely to continue for the next six months (possibly longer), the CAO process requires periodic high-intensity support on the part of the CR Manager and CR Surintendant (base load of up to 40% and 20% of their time, respectively, and up to 80% of their time in the weeks immediately preceding the regular '6-weekly' CAO sessions). Thus, it is recommended that CBG consider renewal of the ACORN International contract, if it seems likely that the CAO process will extend beyond July 2022.

The remains the distinct possibility that, as early as Q3 and Q4 2022, workload pressures on the CR team will further increase if there is a 'GO' decision to resume exploration in the north of the Cogon concession area. The plateaux selected for exploration are a considerable distance from Sangarédi (IESC understands that the nearest plateau is up to 30 to 40 km distant by road) and exploration activities are expected to cover three plateaux (there are expected to be at least 7 affected villages). This campaign will require allocation of CR team resources at some considerable distance from its two areas of operations. Alternatively, CBG might decide to require its exploration contractor/s to undertake all the required stakeholder engagement under its oversight. Although this might reduce the workload on the CR team, such oversight, at a distance, is nevertheless time-consuming. Also, overall, the saving in staff resources resulting from this option may be minimal¹¹.

In the summer of 2021, CBG appointed the consultancy NTRospective to prepare the SEP for the period 2022-2025. Currently, the work is progressing with the SEP scheduled to be ready for disclosure by the end December 2021. *Post VSV Note: in the week following the VSV, an alignment Ccall occurred, involving CBG/NTRospective, in which PLs/IESC discussed the work done to date/proposed future work. Finalisation of the SEP was still ongoing as of end January 2022.* Implementing the new SEP will require a period of 'bedding in' before the 2022-2023 action plan is familiar to all team members.

¹⁰ Percentages have been rounded up or down and, therefore, totals do not necessarily add up to 100%.

¹¹ Prior to the 'GO/NO GO' decision, should the ESIA and compensation procedures proceed then there will be an intense, but limited period of consultations required.

Overall, there is considerable uncertainty as to the extent that overall CR team workloads will increase in the remainder of 2021 and all of 2022, as follows:

- The scope and extent of CR team involvement in resettlement planning/implementation, especially in the context of assuming responsibility for managing all resettlement work until a new Resettlement Manager is in post;
- The eventual 'GO/NO GO' decision on the North of Cogon exploration programme; and
- The indirect effects on workload delivery of the training programme planned for CR team members, especially in 2022 (see section on *Equipment resourcing and training*, below).

In the near term, there is certainty that increased workload pressures will impinge on the senior CR team members, especially the CR Manager and the CR Superintendent (*Surintendant*), due to the addition of resettlement work plus the ongoing CAO activities. The CR Manager needs to plan, carefully, the interplay of day-to-day operational work and training to ensure that an acceptable balance of activities is obtained and frequently review resourcing levels within the CR Team as roles/tasks evolve. This recommendation applies even after a permanent Resettlement Manager is in post (assuming this occurs before end 2022).

Equipment and training

Equipment

As presented in its March 2021 VSV monitoring report, CBG selected the software platform 'IsoMetrix' for both social and biodiversity data management. The software was launched on 29 January 2021 and training to CR staff given plus a member of the resettlement team. Installation was planned in 2 phases: Phase 1 was almost completed in March 2021, and Phase 2 (including development of the 'dashboard') was due to begin in April 2021.

Also, the IESC reported that CR team members using IsoMetrix experienced delays in certain functions particularly in terms of uploading/downloading files. IsoMetrix then installed an upgrade which was tested on the 8 March 2021 which indicated some improvement, but not sufficient for CBG to be content with overall performance. Performance testing was planned to continue during the period March-April 2021. As of 10 March 2021, the CR Manager considered that, if by the end April 2021 performance was not considered satisfactory, CBG may need to install a separate dedicated server located in Guinea. In addition, the CR Manager consider that this 'worst case' scenario would delay achieving an acceptable level of performance until end August 2021.

During the October 2021 VSV, the IESC was informed that IsoMetrix performance had not improved despite joint efforts of IsoMetrix and CBG specialists. The current diagnosis considers that there is a 'cache' problem which might be resolved via dedicated local server. Currently, the slowness of IsoMetrix is discouraging users and, functionally, it is not fit for purpose. The next steps are, as follows:

- Relaunch of Phase 2 in Q1 2022;
- Installation of a dedicated server in Kamsar (this has been approved by CBG and the cost is included in a 2022 budget line); and
- IsoMetrix will support CBG to import social data into the IsoMetrix database as the task is now too big for CBG to manage by itself. Also, the IsoMetrix modules will be redesigned, as necessary to be aligned with CBG templates (forms etc.) used by the CR and Resettlement teams. Also, new modules may need to be created.

As of end September 2021, IsoMetrix has not been installed (since Phase 2 is delayed). IsoMetrix installation progress and operational performance will be assessed during the next monitoring site visit.

The Capacity Development and Resource Acquisition Plan (version 1 of November 2020) included an action to allocate an additional 4x4 vehicle, for use by CR team members based in Sangarédi, by the end January 2021. During March 2021 VSV work, the IESC was informed that this allocation had not occurred. Subsequently the vehicle was allocated on 17 May 2021 (three and one-half months after the initial delivery date). There are now four vehicles available in Sangarédi; two for the CR team and two for the Resettlement team.

Version 2 of the Capacity Development and Resource Acquisition Plan (dated 15 July 2021 and not yet finalized) sets out the digital equipment (including software/hardware) to be acquired to enable better data collection in the field and, subsequently, office-based data analysis and presentation (especially GIS/mapping) with dates by which acquisition will be completed. Table 5-1 list the purchasing actions and provides information on the status of the actions with reference to the expected completion dates. There is an expected delay of 3 months in the acquisition of the ARC-GIS Infrastructure and a shorter delay in acquisition of the Garmin 64 GPS handsets. Currently, the acquisition processes for the three remaining items (ENVI software; Trimble Youmas and NOMAD devices are 'on track'.

Table 5-1: Digital equipment acquisition: status against Plan completion date

Action	Original Completion Date (as per Plan)	Status	Actual/Expected Completion Date
Acquisition of ARC-GIS Infrastructure	31 October 2021	Contract being drafted	Expected: 31 December 2021
Acquisition of ENVI Teledetection Software	31 March 2022	Purchase order validated. On track	Expected: 31 March 2022
Purchase of Trimble Youmas	31 December 2021	On track	Expected: 31 December 2021
Purchase of NOMAD devices	31 December 2021	On track	Expected: 31 December 2021
Purchase of Garmin 64 GPS sets	1 May 2021	Completed (short delay)	Actual: 'Summer' of 2021

Training

The current version of the programme entitled 'Training on Social Matters' (dated 29 July 2021 and not yet finalized) presents a schedule of training activities for 2021 and 2022 (but with no dates agreed with the providers) with the names of the training providers. There are 16 training topics/events with most being held in Guinea or on-line, while three training events are based outside Guinea. There are a range of providers, with the main provider being IFC Advisory (nine topics/events). Seven of the topics/events will occur and be completed in 2021 (mostly in Q3 and Q4) and eight topics/events will occur and be completed in 2022 with one topic/event occurring over Q4 2021 and Q1 2022.

At the time of the October 2021 VSV, only two of the seven scheduled 2021 training events were completed:

- Integrated Data Management System (IsoMetrix) – occurred in Q1 (January) 2021; and
- Stakeholder Analysis and Engagement – occurred on-line in Q2 (June) 2021. One person from CFB attended along with CR team members.

Of the remaining five training topics/events, only the IFC Advisory training event on 'Management of Grievance Mechanism' is expected to occur as scheduled (this training will be open to a broader CBG group; that is, not only limited to the CR/Resettlement teams). All the other training topics/events will occur in 2022 at dates to be agreed with the provider (IFC Advisory). The CR Manager informed the IESC that staff workloads in Q3 and Q4 2021 precluded participation in most of the training events scheduled for these two quarters.

A new training topic/event was added to the schedule: 'Promoting the Social Acceptability of a Project' which is an on-line course over five weeks and being provided by the University of Sherbrooke (Canada) over the period September to October 2021. Rio Tinto played a role in introducing CBG to this training course. In addition, the IESC was informed that the CR Superintendent may study for an MBA (HEC Montréal) in 2022. This course would be on-line.

It is unfortunate that several training events have been delayed by potentially up to one year and that dates for these events have not been agreed with the provider; however, the reason (staff workloads) for the delay is, in the IESC's view, understandable and valid. Given the delay, there is an opportunity for the CR Manager to consider actions that could be adopted to improve training outcomes while minimizing disruption to workloads. The IESC makes three recommendations for the CR Manager to consider:

- Planning and organizing staff time so that there is minimum disruption to workloads while fulfilling training commitments. Possible options include careful selection of personnel to be attending specific training events, scheduling events so that one event immediately follows another ('back-to-back' sequencing) and providing incentives for some training to be undertaken outside standard working hours;
- Applying the 'train the trainer' model where only one or two staff members attend a training event and then they train their colleagues on the key principles and/or practices in shorter subsequent training events; and
- In the context of future training needs for the period 2023 – 2024; selecting fewer key training topics/events (perhaps a maximum of 10 topics/events).

The results of applying these recommendations will not only assist CR/Resettlement staff to manage, better their workload/training balance; it will also free up some time for CR/Resettlement staff to add value to their training experience, including knowledge gained, by training colleagues from other departments on certain key topics such as managing grievances. As part of CBG's efforts to bring current operations up to a level consistent with the intent of the IFC Performance Standards (ESAP requirement) there is a need for other departments such as Human Resources, Procurement and Legal, and Mining to be aware of their role in these efforts. One way of achieving this objective is for a programme of periodic internally-led training or awareness-raising events to be organized and delivered. To maximize the potential benefits from this situation, IESC suggests that the HSECQ Director (supported by the CR Manager) consider convening a meeting with the Directors of key departments to discuss a practical approach/programme to provide this support.

5.2 Management Systems

The IESC has previously confirmed that the following ISO certificates listed below remain valid until Q1, 2023.

- ISO 14001 (Environmental Management);

- ISO 9001 (Quality Assurance); and
- ISO 45001 (Occupational Health and Safety).

The IESC has also been informed that CBG is planning to become a certified member of the Aluminium Stewardship Initiative (ASI) in 2023. Further information on CBG's efforts in this regard will be provided in subsequent IESC monitoring reports as CBG's application progresses.

5.3 NoCo exploration campaign

Following its review, during the March 2021 VSV, of CBG's activities and intention regarding the prospective exploration campaign, the IESC identified several concerns about the approach being applied by CBG and provided recommendations to reduce the risks. At the time of the March 2021 VSV all exploration activities had ceased.

During the October 2021 VSV, the IESC was informed that CBG intended to undertake the following decisions/actions as part of the LDP preparation process:

- There will be either a single LDP or separate LDPs for the NoCo 3 plateaux;
- Implementation of a biodiversity assessment followed by a report identifying biodiversity risks and mitigation actions (a consultant is already appointed). This work is currently delayed by the wet season (which will be over by early November 2021), but can begin in early part of the dry season;
- The CR and Resettlement teams will undertake all necessary work to identify those who may be temporarily economically displaced by the exploration activities and, also, to inventory assets affected and pay all compensations prior to issue of the LDP/s;
- Implementation of an access study (a Project Manager for this study has been appointed) focusing on infrastructure status. This study is at the scoping stage. Should the study indicate that access to the plateaux is feasible with/without any interventions then ESIA work will begin.
- The ESIA results will help determine the design and implementation of the exploration programme (preferred option);
- There will be a 'GO/NO GO' decision regarding mining NoCo; and
- If there is a 'GO' decision then the exploration programme will enter the Life of Mine Plan, which will be provided to Lenders for approval.

CBG confirmed that all compensation for assets will be paid to PAPs prior to land disturbance activities occurring.

These actions are important elements of the approach being taken by CBG to determine whether to proceed with the exploration programme. In its March 2021 VSV report, the IESC made the following three recommendations for CBG action:

- 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; and
- Implement one round of community consultations as part of the E&S Rapid Appraisal stage, at a time which CBG considers most appropriate in the local context.
- Ensure that CBG's contractors acquire agreements, with all affected land rights-holders, for use and/or occupancy of land for fly camps and temporary laydown areas in a PS 5-compliant manner.

The first two of these recommendations refer to the situation, at the time of the March 2021 VSV, which has now changed insofar as an ESIA Report will be prepared should access to the NoCo

plateaux be deemed to be feasible. Given the intent to prepare an ESIA Report; the IESC expects CBG to implement ESIA work and prepare an ESIA Report in a manner that is compliant with all applicable IFC Performance Standards, especially regarding stakeholder engagement and consideration of cumulative impacts.

The third recommendation remains valid and is included in this report in a slightly amended form.

5.4 Environmental and social management plans

5.4.1 Background

By January 2019, the full suite of E&S management plans had been updated to apply to all CBG operations (rather than be specific to the Expansion Project) and were considered complete and 'signed off' by the IESC.¹² A key component for most of the management plans is the inclusion of an action plan, detailing firm commitments to undertake future actions with timeframes and responsible parties identified for each action.

The IESC has previously highlighted that many of the Management plans have been updated to reflect additional commitments associated with the MUOA ESIA. However, amendments made as a result of the MUOA project tended to be additional to existing requirements and were not applicable to all management plans. This the IESC has previously recommended a full review of all E&S management plans, noting that these plans themselves point to a 2-year review cycle and certain requirements have been superseded and are now redundant. The IESC has been informed that the Environmental Management Plans (EMP) will be reviewed and updated in early 2022.

The IESC welcomes the review and reminds CBG that such changes are subject to the Management of Change procedure.

5.4.2 Management Plans: progress review of Action Plan implementation

Environmental Management Plans

As reported previously, implementation of actions specified within EMPs is behind the schedule presented in late 2018/early 2019. This was attributed to various reasons, most notably the absence of an EMTL for the majority of 2020, COVID-19 restrictions and overly ambitious timeframes specified in the original management plans. Recommendations pertaining to the review and update of EMPs and associated Action Plan therein remain unchanged since previous site visits.

During the VSV the IESC was made aware of a change in strategy implemented by the EMTL recognising that certain items are heavily dependent on the cooperation of departments other than the HSECQ Department. Thus, primary responsibility for actions is now allocated to 11 different departments including Mine, Maintenance, Procurement, Security, CFB (Rail) or Finance in addition to the HSECQ (Figure 5-2). The transfer of responsibility was made with the agreement of each department during a series of meetings. The HSECQ Department will still have overall responsibility for ensuring actions are executed working with multi departmental steering committees. Each department will also have a coordinator responsible for tracking progress and liaising/reporting to HSECQ.

Actions specified within each Action Plan have also been consolidated within a single database to assist in the monitoring of implementation. The changes made by the EMTL should lead to greater buy-in across the CBG departments and better coordination with HSECQ.

¹² All plans were updated, however further studies were required to finalise the Air Quality Management Plan.

Greater involvement of the other departments will also help in the realistic setting of revised timeframes/identification of risks to any revised schedules such as supply chain risks. The IESC has noted in instances that delays have been caused whilst awaiting new equipment. Reliance on the import of specialist equipment is a factor in such delays, exacerbated by a slow procurement process. In Chapter 9 of this report we highlight the need to fast track procurement of goods/services needed to facilitate resettlement and livelihood restoration actions, however a slow procurement process has implications across all of the E&S topic areas, for example, procurement of specialist environmental monitoring equipment. The IESC therefore recommends a review of CBG's procurement process to identify opportunities to expedite procurement of goods and services across all E&S disciplines.

Table 5-2. Allocation of primary responsibility of tasks to CBG departments

Department	WMP	AQMP	NVMP	HMMP	RUEEMP	WaMP	TOTAL
Mine	7	2	5	7	15	13	49
Plant	14	5	0	0	0	0	19
Maintenance	37	1	4	6	24	3	75
HSECQ	59	25	27	22	28	113	274
Procurement	0	0	0	4	0	0	4
Security	0	0	0	2	2	0	4
CFB	0	0	1	2	2	2	7
General Direction	2	1	1	0	5	7	16
City of Kamsar	0	0	0	0	0	5	5
Engineering	0	0	0	0	17	13	30
Finances	0	0	0	2	1	0	3
TOTAL	119	34	38	45	94	156	486

Overall implementation progress is calculated to be 59% (Q3 2021) with 413 actions closed and 66 actions across all EMPs reportedly behind the timeframes originally set out in the 2018/19 Action Plans. Revised timeframes will be assigned to outstanding actions as part of the EMP review process in early 2022.

During the current VSV, the implementation review focused on 8 plans that were originally finalised and signed-off by the IESC in January 2019, as listed below:

1. Air Quality Management Plan;
2. Environmental Monitoring Programme;
3. Hazardous Materials Management Plan;
4. Noise and Vibration Management Plan;
5. Resource Use and Energy Efficiency Management Plan;
6. Waste Management Plan;
7. Water Management Plan; and
8. Dredge Management Plan.

Progress made for each plan is provide on a topic-by-topic basis in Chapter 7.

Social Management Plans

Information is provided on plan implementation for the year 2021 only. The implementation of the following Plans, in 2021, was reviewed:

- Local Content Plan (LCP);
- Cultural Heritage Management Plan (CHMP);
- Influx Management Plan;
- Community Health and Safety Management Plan;

- MUOA Transitional Measures Plan (See section 8.6.1); and
- Community Development Plan (CDP).

Implementation of all these plans is the responsibility of the CR team. All these plans were amended to take account of the MUOA Project and in some cases, non-MUOA prompted changes were made based upon experience of implementation at the time of making the MUOA-related amendments.

As shown in Table 5-2, over all Plans there were only a few measures due to be completed in 2021. Most were continuing (being implemented until the end the Plan period) or ongoing (started before 2021 and due to be completed at a future date, but before end of the Plan period).

Table 5-2: 2021 - Summary of Social Plan Implementation

Management Plans	Planned Actions	Completed	Continuous	Ongoing
Local Content Plan	11	2	5	4
Community Health and Safety Management Plan	19	2	15	2
Cultural Heritage Management Plan	14	2	10	2
Influx Management Plan	5	1	3	1
Community Development Pan	13	4	3	6

CBG has analysed progress in implementing Plan actions for the CDP, CHMP and the LCP. Figure 5-1 shows implementation progress from 2018 to 2021 year-to-date. Though the data relate to only three of the suite of 'Social' management plans, the IESC considers that relatively similar incremental progress toward completion of actions applies to other 'Social' plans. This will be investigated in more detail in the next site visit to occur in Q1 2022.

CBG BAUXITE MINE

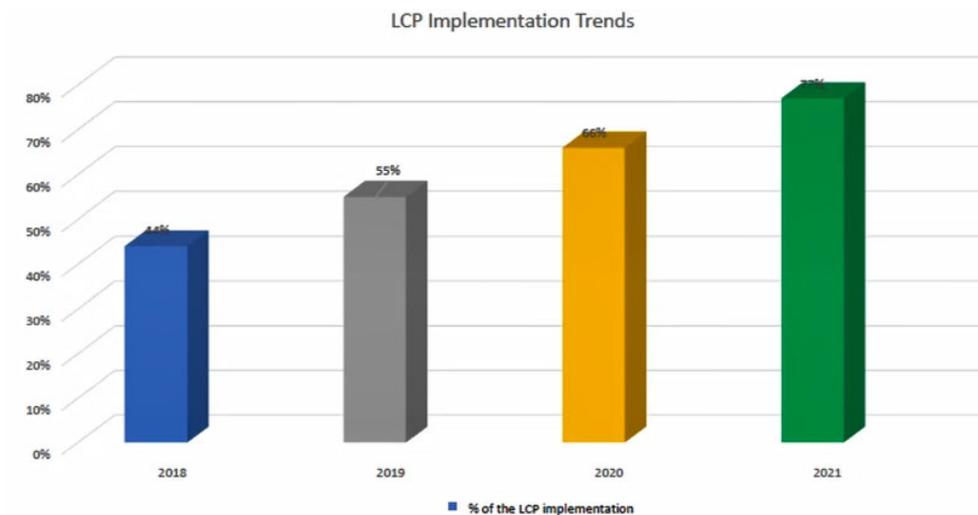
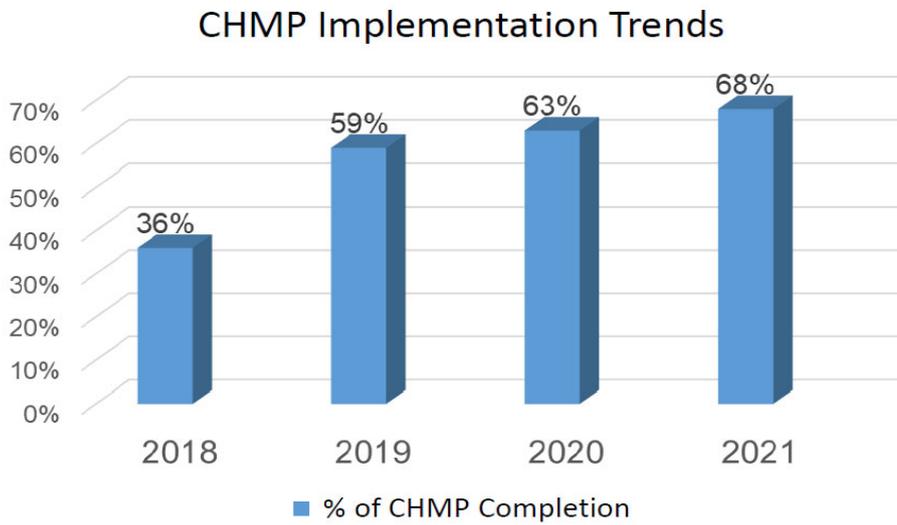
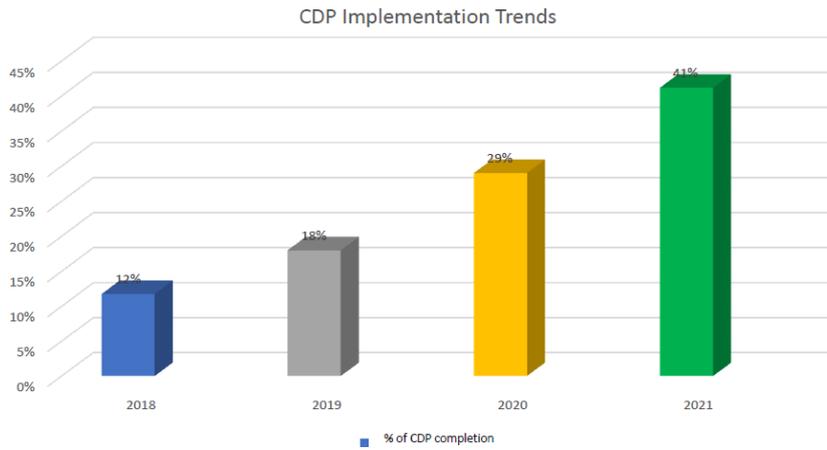


Figure 5-1: Implementation progress (% of actions completed) for CDP, CHMP and LCP: 2018 to 2021 year-to-date.

5.5 Stakeholder engagement

The following topics were identified for discussion with CBG during the VSV:

- Implementation of the stakeholder actions for the year 2021 as presented in the 'Action Plan for Stakeholder Engagement 2019-2021';
- Scope and focus of stakeholder engagement;
- Female participation in consultation meetings;
- Management of community grievances;
- Management of community requests for assistance (*doléances*).

5.5.1 Implementation of the stakeholder actions for the year 2021 as presented in the 'Action Plan for Stakeholder Engagement 2019-2021'

A total of 45 actions were planned in the 'Action Plan for Stakeholder Engagement 2019-2021'; 25 of which are either continuous or ongoing. Of the 20 remaining actions, 13 are completed and 7 are not started. Several of the 'not started' actions are dependent upon other CBG activities being implemented according to schedule and, therefore, the engagement actions are dependent on the other actions occurring. For each of these actions, the CR team has an identifiable activity or an event, if not an exact date, which will trigger implementation of the planned corresponding engagement action.

5.5.2 Scope and focus of stakeholder engagement

As mentioned above, CBG appointed the consultancy NTRospective to prepare the SEP for the period 2022-2025. Currently, the work is progressing, and the SEP is expected to be ready for disclosure by the end January 2022. This work involves a comprehensive revision of the SEP that was first issued in 2016 and, therefore, is a major task. By various means such as comments upon related draft E&S Management Plans; for example, the Community Health and Safety Management Plan and the Influx Management Plan, Policy Lenders/IESC have indicated the changes they wish to see reflected in this revised SEP, as follows:

- A clear set of requirements for disclosure and consultations that reflect PS1 requirements and emerging good international practice with focus on:
 - reporting (including mechanisms) on CBG actions/environmental monitoring results/performance to Affected communities and, to a lesser extent, local government entities;
 - participatory monitoring; and
 - feedback channels to CBG and that the ensuing dialogue is maintained;
- Description of the approach used to identify vulnerable individuals and groups (including households) followed by presentation/listing of the vulnerable individuals/groups, identified via application of the approach, which will require targeted disclosure and consultation methods within the context of SEP implementation;
- Options for increasing female participation in all engagement activities;
- Inclusion of the topic of gender-based violence and actions that can be taken to raise awareness, in both urban and rural contexts, as a means of reducing its prevalence; and
- A revised community-level Grievance Mechanism to encourage inter alia i) greater use by community members (individually and in groups), especially women and ii) better recording by CBG community-focused employees, of concerns /issues raised by community members, even though they may be informally resolved 'in the field'.

Since the March 2021 VSV, CBG reports that COVID restrictions have eased progressively and, as of end September 2020, they are not acting to hinder engagement with stakeholders such as communities.

For 2020, there were 230 stakeholder meetings (nearly half of them being with communities = 110) compared to 347 meetings in total in 2019 (2019 AMR). In 2021, up to end September there were 295 stakeholder engagement meetings with 179 of them being with communities; this is 61% of all meetings and represents a noticeable increase on the 2020 figure and reflects the easing of COVID restrictions. Figure 5-2 provides a breakdown of the number of meetings per stakeholder category and the same data expressed as percentages.

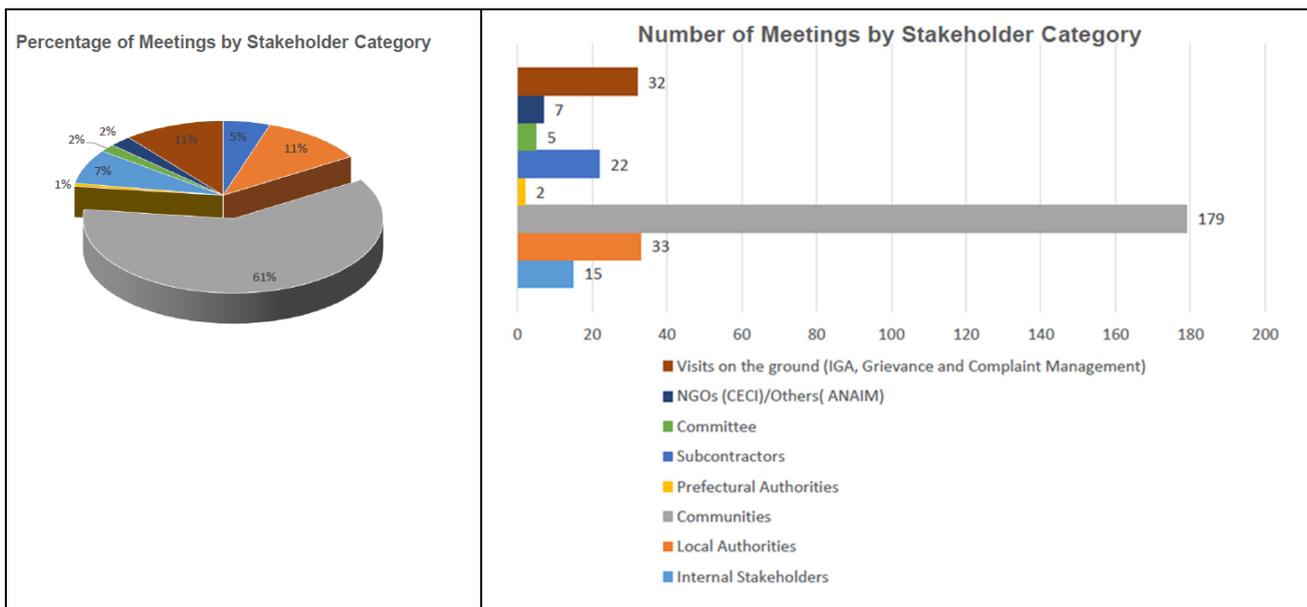


Figure 5-2: 2021 to date - numbers/percentages of meetings by stakeholder category

In 2021 year-to date, community-focused meetings occurred in 107 villages (2020 equivalent figures are provided in parentheses), as follows: mine – 52 (51) villages; railway – 45 (34) villages; and port – 10 (13) villages. The only noticeable change is the increase in the number of villages located in the vicinity of the railway, reflecting the meetings concerned with all aspects of health and safety, especially the provision of new footbridges (*passerelles*) and the improvements made to existing at-grade crossings such as level crossings.

Figure 5-3 compares an analysis of all stakeholder engagement meetings by zone over the period 2019 to 2021 year-to-date. It is necessary to be careful in drawing conclusion as a) the 'context' for stakeholder engagement during each of these three years are not similar and, also, the figures for 2021 are only up to the end of September. However, the data do indicate some differences in the focus of stakeholder engagement over the three-year period:

- The number of meetings occurring in the mine area has increased noticeably year-on-year (72% in 2021 to date compared to 47% in 2019);
- The decline in the number of meetings in the port area is continuing though there was only a 3% reduction between 2020 and 2021 compared to a 15% decline between 2019 and 2020; and
- The proportion of meetings related to 'rail' (includes MUOA-specific consultations) was almost identical for 2019 and 2020, but there has been a decline of 8% between 2020 and 2021.

It is noteworthy that the number of meetings occurring in the mine area has increased by 65% over the period 2019 to 2021 year-to-date. This increase is probably due to the increase in the area to be mined and the resulting number of resettlement plans being prepared.

As indicated in the March 2021 VSV report, CBG intended to engage with several, isolated (and sometimes only seasonally inhabited) island villages in the vicinity of the port. Previous efforts at engagement faced logistical challenges, including COVID restrictions. In 2021, CBG managed to travel to/engage with three such communities (Taidy, Diapiaré 1 and Diapiaré 2). Three awareness sessions on maritime safety, environment, biodiversity conservation, and grievance mechanism were conducted. In addition, one information and awareness-raising meeting was held for artisanal fishermen (those in charge of landing sites and island communities) on CBG's 2021 dredging activities.

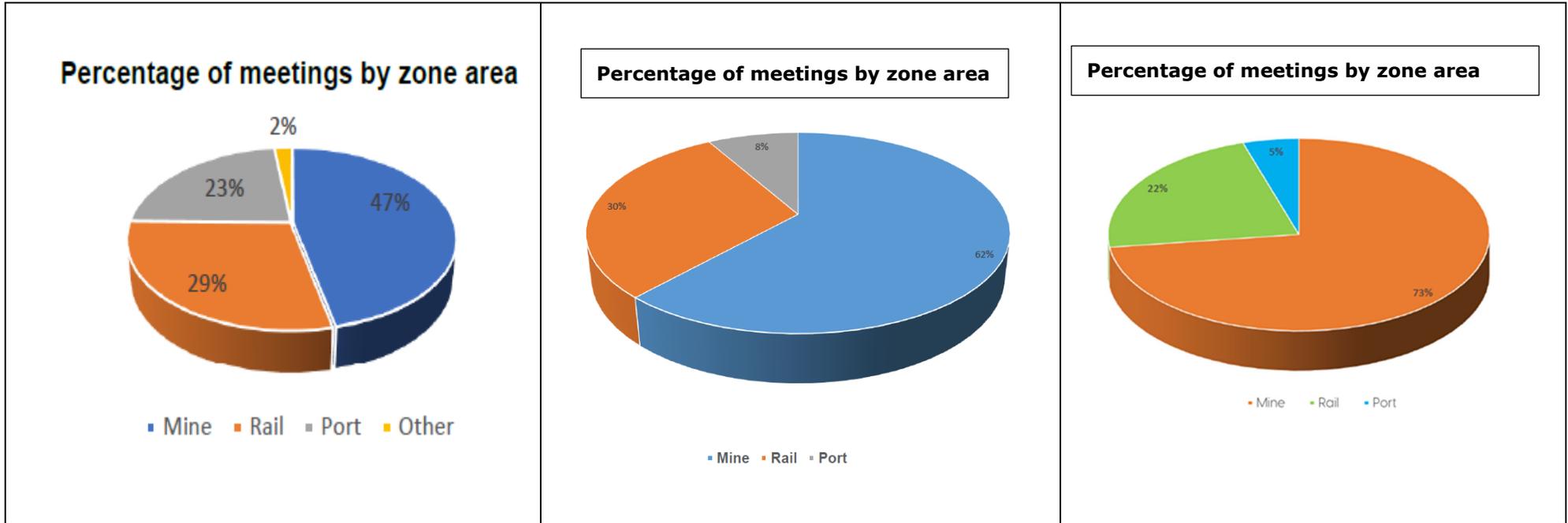


Figure 5-3: Percentage of stakeholder meetings (%) by zone area: 2019 (on left); 2020 (in middle), and 2021 to date (on right)¹³

¹³ The 'other' category refers to internal stakeholders and, as it is such a small % it can be discounted for the purposes of the analysis, based upon these data, presented in the accompanying text.

Key engagement activities, by zone, for 2021 year-to-date are:

- Port: Meetings with the island villages in the vicinity of Kamsar port once they have been identified and contacted (see above) and three information and awareness-raising meetings for the local authorities of Bintimodia, Kamsar Cité and Momoyiré on the themes of the environment, community development and grievance management;
- Rail: Meetings focused on raising public awareness of railway safety, especially in schools, mosques, markets, and with those involved in the transport sector. Consultations continued to be under the MUOA transitional Measures Plan (for example, presentation of CBG plans for footbridge installation and information meetings prior to the start of installation work); and
- Mine: Meetings with high and medium impact villages (stripping and exploration) in the context of the implementation process for the Hamdallaye and Fassaly Foutabhé RAP (livelihood restoration component) and Kankalaré and Thiapikouré LRPs plus preparation of the LRPs for the Contingency Blocks and the Kagneka and Parawi Extension. Community consultations were also held as part of the implementation of the blasting monitoring protocol and, finally, meetings with communities with respect to community 'alerts' relating to community concerns about public utilities such as provision of water and electricity.

The meetings in the mining area concerning community 'alerts' represent a new and unplanned type of engagement. When communities are concerned about potential problems on supply of water and/or electricity, some now contact CBG for assistance and before they take action such as establishing a blockade (*blocage*). Previously, such events would occur without CBG's knowledge. Communities approaching CBG for assistance in relation to resolving disputes with local authorities/utility providers is a new and may indicate an enhanced level of trust, on the part of the communities (which may have been lacking previously) that CBG is a 'good neighbour' that can be relied upon to assist communities. It is too early to be sure that this type of engagement will continue, but that fact that it is occurring now is an encouraging sign of good relations between CBG and certain mining communities. In this context, it is noted that CBG has commissioned IFC Advisory to conduct a water access survey, especially in the mine area.

5.5.3 Female participation in stakeholder engagement meetings

CBG began analysing the male/female ratio in terms of participation in stakeholder engagement events, especially community-level meetings in 2019. Over the entire year, 2020, CBG found that, for the mine zone, 32% of participants were female and for the port/rail area, females constituted 46% of all participants. This latter figure was attributed to the high number of female school children attending rail safety sensitization events. For the year 2021 year-to-date, CBG reports figures in a different way with the figures being: mine (23%¹⁴), port (33%) and railway (44%). It is noticeable that the proportion of females attending at the mine has reduced by from 32 % to 23%. This change may not be representative of 2021 as a whole because the main agricultural season is from May to October and, during this period, many women are working outside the core village area. Meetings in Q4 2021 may attract more females and thus act to redress the reduction in female participation observed to date in 2021. Of course, attendance alone does not mean participation.

From early 2021, CBG acted to improve female attendance rates and active participation in 2021 and into the future, as follows:

- Increased use of all female focus groups led by female CBG CR staff (because male led focus groups could act as a deterrent to female participation);
- Organizing meetings for times when more women are likely to be able to participate, for example, after the harvest; and

¹⁴ Compared to 21% in Q1 2021.

- Instructing contractors to ensure high levels of female attendance/participation in the context of resettlement planning /implementation.

It may be that these actions increase female participation rates. As a possible contribution to CBGs efforts to increase female participation (not necessarily attendance rates) and in specific context when it is important to obtain a relatively accurate understanding of the perspectives of women, the IESC recommends that CBG consider implementing one or more of the following options:

- Identifying informal/formal female associations in the villages such as women's farming/gardening groups and then organizing meetings;
- Organizing meetings in the fields where groups of women may be working together (in rest periods and not interfering with work regimes);
- Providing gender sensitivity training to staff; and
- Random walks in villages and to/from agricultural areas to engage in informal conversations with individuals or small groups of women.

It is recognized that some of these suggested approaches are more informal than the model of formal village meetings followed by Minutes. However, recording of useful information can occur; if a random walk approach were used, then a summary of key point raised (with date and number of contributing women) and recorded into IsoMetrix would be sufficient as record of the engagement.

5.5.4 External communications and community grievance mechanism

External communications

In late November 2020, a Communications Plan was prepared for the year 2021. A copy of the plan was provided to the IESC soon after the end of the March 2021 VSV. The IESC's examination of the Plan led to several findings and recommendations. During the October 2021 VSV, the IESC was informed that the Plan for the year 2022 was under preparation. As the 2022 Plan was not available for review with respect to the IESCs' findings and recommendations; this action is planned for the next site visit in Q1 2022.

Community Grievances (2020 and Q3 2021)

The March 2021 VSV report identified three issues with accompanying recommendations regarding the application of the grievance mechanism and analysis/reporting of grievance management data. Actions have been taken or are planned to close-out these three issues.

As of 31 December 2020, CBG received 38 community grievances (nine more than for 2019). All originated from the mine and rail zones (89% and 11% respectively); this is a significant change from 2019 when the proportions were approximately equal. During the October VSV, the IESC was informed that CBG had logged 32 grievances¹⁵. Figure 5-4 provides a breakdown by the three broad categories with most (24) grievances classed as 'economic'. Of these 69% concerned compensation/allowance payments with 6 grievances (25%) made in relation to resettlement activities. There were four grievances classed as 'environment' (all related to spills/water pollution) and 'safety' (two related to blasting damage to structures and the others to lack of communication and rail safety) respectively. Nine grievances were closed and 23 were open ('in process').

¹⁵ CBG's Q3 2021 Quarterly Monitoring Report presents a copy of the grievance register up to and including 30 September and it shows that the number of grievances logged is 36. However, the figures given to the IESC during the October VSV are used as the basis for comment in this October VSV monitoring report.

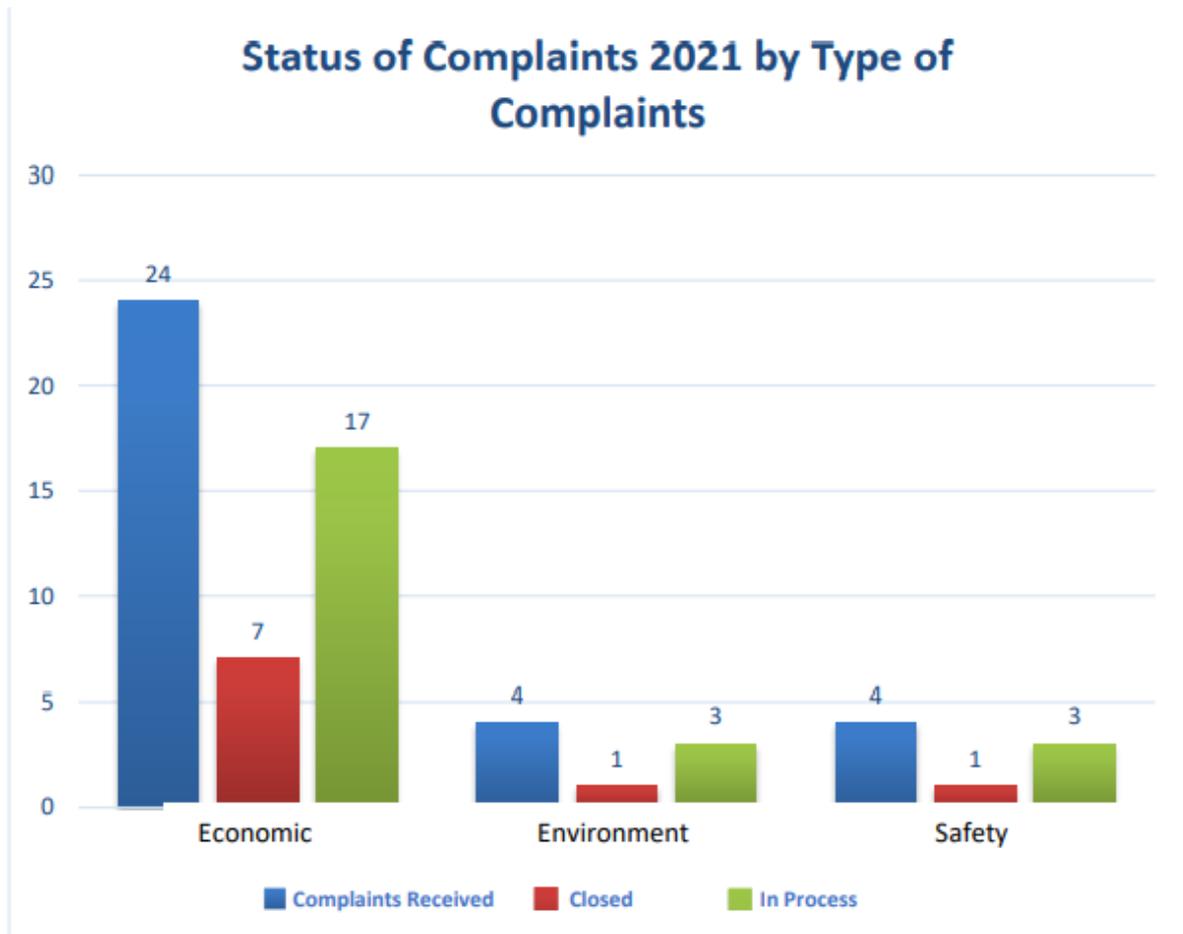


Figure 5-4: Analysis of grievances registered at end of Q3 2021.

Thirty grievances (94%) came from the mine area and two (6%) from the railway area with no grievances received from the port area. These reflect a continuing trend first detected in 2020. In 2019 the relative proportions were approximately equal; whereas at end 2020, 89% grievances came from the mine and 11% from the railway area. As indicated in the IESC’s March 2021 VSV report, this trend reflects the increasing extent of mining operations and resettlement actions at the mine area and the reduction in MUOA-focused railway activities. It is noteworthy that only six grievances (19% of the 2021 year-to-date total) are classed as being directly related to resettlement actions given the extent of these activities in the mine area (See also section 9.5 below).

In previous IESC monitoring reports, the IESC has noted that some grievances take more than six months to be closed. At the time of the March 2021 VSV, of the open 2020 grievances (seven), most were recorded before August 2020 making them all more than 6 months old. The IESC noted, in its previous monitoring report (July 2020 site visit), the effort that CBG was making to accelerate internal co-ordination and decision-making with respect to grievance management by means of the HSECQ Monthly Committee Meetings, which focus on community grievances, blockages and possible solutions.

During the October 2021 VSV, the IESC identified grievances that had been raised between 1 June 2020 and 1 June 2021. Eight of the identified grievances were open with the following highlights:

- 1 grievance had been open for 15 months:

- 4 grievances had been open for between 7 and 8 months; and
- 3 grievances had been opens for 4 months.

These figures indicate a small improvement in the 'open' time periods as three out the eight grievances had been open only for 4 months (the comparison is approximate, but essentially there is a comparison of grievances raised in a 12-month period (June to June) with the analyses of the still open grievances occurring 3 months later).

Also, an analysis was undertaken of the closed grievances with the following highlights:

- The longest time taken to achieve closure was 8 months (1 grievance) and the shortest time was 3 weeks (2 grievances); and
- The average time taken to achieve closure was 3.3 months and the median was 2.5/3 months.

It is too soon to see a noticeable and sustained reduction in the time taken to close grievances, but the data presented here provide a starting point for tracking grievance closure times over the next few years.

Effectiveness of the grievance mechanism

For the past five years, the IESC has tracked the performance of the grievance mechanism, which was revised in 2015. In 2015, 45 grievances were recorded and in subsequent site visits, in 2016 and 2017, the IESC found that the annual number of grievances declined to five and then ten respectively. In subsequent years, the annual number of grievances recorded increased but never exceeded 40 grievances any single year despite considerable efforts being made by the CR team to raise awareness of communities about the grievance mechanism, its operation and benefits to individuals, households, groups and communities.

Also, over the past three years, CBG has relocated Hamdallaye village and has been in the process of preparing several LRPs. This work has involved socio-economic surveys, asset inventories, evaluation of assets and paying monetary compensation to many PAPs. As there is no separate grievance mechanism related to resettlement activities, any grievance arising from resettlement work will be recorded in the community grievance mechanism. It is the view of the IESC that the annual number of grievances received over the past three years does not reflect the 'on the ground' reality in the context of grievance management by other mining companies in Guinea or other similar West African situations (the numbers of CBG grievances per year being comparatively low). This conclusion is based upon knowledge of major mining projects operating in west Africa having similar operating characteristics (see also section 9.5 below).

The overall finding based upon analysis of all grievances over the past five years is that the current grievance mechanism is not functioning effectively. This situation could result from several causes, such as lack of clarity in the written grievance mechanism, operational complexities, lack of consistent an coherent understanding amongst community-facing staff members (including CBG's consultants) on the scope of the grievance mechanism (differences between a grievance, complaint or concern) and their role while in the field and faced with a concern, complaint, grievance, suggestion, observation or other communication that someone wants to be brought to the attention of CBG. It is recommended that the community grievance mechanism is reviewed and revised, as appropriate, within the context of preparation of the SEP 2022-2025. The revised community grievance mechanism will exclude resettlement-related grievances if the IESC's recommendation to prepare a separate grievance mechanism for these grievances is adopted (See section 9.5 below).

Once the 2022-2025 SEP is disseminated, intensive training focusing on the application of the grievance mechanism should be implemented for all community-facing staff (including consultants). Ideally, this training will be the planned training on 'Management of Grievance

Mechanism' to be provided by IFC Advisory (currently scheduled for Q3 and Q4 of 2021). Unfortunately, this proposed timing does not align with the schedule for finalization and dissemination of the SEP 2022-2025. It is recommended that CBG enter discussions with IFC Advisory to re-schedule this training so that it is delivered at dates soon after the revised grievance mechanism is finalized and disseminated (expected to occur in Q1 2022).

Legacy grievances

At the time of the March 2021 VSV, the IESC understood that only two legacy grievances (grievance logged before end 2018) were still open. One of them, a 2018 grievance concerning a fire affecting cashew trees at Bhoundouwadé had entered a judicial process. A court decision is still awaited so the grievance is still open, although the process for closure is now outside CBG's control.

The remaining legacy grievance dates from 2016 and refers to the closure/rehabilitation of a quarry at Bintimodia. In early March 2020, the Bintimodia Commune authority sent an official letter to CBG stating its wish to have the road of Bintimodia rehabilitated instead of the closure of the quarry. CBG began work to rehabilitate the road (22 km), but work was suspended due to the rainy season. During the March 2021 site visit the IESC was informed by CBG that completion was expected by end April 2021 and subsequently, during the October 2021 VSV, the IESC was informed that the works were completed on 24 May 2021, and the grievance is now closed.

There are four grievances logged in 2020 that are still open. Below they are listed in date order (oldest first) with a status report as provided by CBG during the October 2021 VSV:

- Community of Madina Kabenya raised a grievance (4 March 2020) concerning destruction of their plantations due to an alleged fire which resulted from MUOA works on the railway:- the community has engaged and advocate (lawyer) to act on its behalf. The community informed CBG, verbally, that it does not wish to engage with CBG directly. CBG is liaising with the advocate;
- A complaint of 18 March 2020 raised by the community of Fassaly Foutabhé related to the dust, generated from activities relating to the Parawi storage area and arising from the COBAD mining road, which settles on their village:- mitigation measures have been put into effect, but despite these measures the community does not wish to close the complaint;
- A complaint from Hamdallaye herders (logged on 15 May 2020) that CBG did not take their concerns regarding loss of pasture into account in the RAP preparation process:- a study was conducted by the technical services of the Sub-Prefecture in which various proposals to resolve the grievance are presented, with their costs. A Memorandum was written and sent to CBG for validation. After validation (agreement on the measures), a service provider will be recruited for implementing the agreed measures; and
- A Kamsar resident raised a grievance (logged on 1 June 2020) regarding the infiltration of runoff water into his fields: The contract for carrying out the remedial work is signed. The finalization of the compensation process is in progress.

It is unfortunate that all of these open grievances are more than 15 months old. Nevertheless, CBG is taking positive measures to close them as soon as possible and for the cases of Hamdallaye herders and the Kamsar resident, there is a reasonable chance that they will be closed soon. The Madina Kabenya and Fassaly Foutabhé grievances are more challenging.

Community requests for assistance (doléances) (2021)

As mentioned in the March 2021 VSV report, as of 31 December 2020, 25 requests for community assistance were received in 2020 (the same number as received in 2019); mostly from the mine area (12) and the rail area (11) with two from the port area. At the end of September 2021, 22 requests for community assistance were received; with the breakdown by

area being as follows: again, most came from the mine area (16); however, the requests from the rail area were reduced to one whereas for the port area five requests were received. The reduction in the number of rail area requests may be due to the reduction in 'on the ground' MUOA- related activities.

Forty-one percent of the requests were related to provision of basic social infrastructure (such as boreholes, schools, and health centres); 27% to opening and/or rehabilitating community roads; 14% to services; 4% to the environment; and 14% to others. Compared to both 2020 and 2019, the percentage of requests for basic social infrastructure increased by 100% whereas the number of requests for opening/rehabilitating community roads declined by 33% and the number of requests related to services declined by 30%. In all three years the numbers of requests classed as 'environment' and 'others' remain small. The reason for these changes is not clear. Similar data will be collected in forthcoming site visits to ascertain if there is any trend starting.

CBG has provided data regarding the status of the 22 requests for community assistance, as follows:

- Ten requests for community assistance were closed;
- One request for assistance by the community of Pora Rail to recruit supervisors was directed to SOTRAC (MUOA contractor);
- Ten community assistance requests are being processed; and
- One community assistance request was not accepted for processing by CBG (request from the mayor of Sangarédi for the reprofiling of the Kéwewol – Wossou – Thiankoye road; this road is located outside the CBG concession.

5.6 Management of Change

The IESC previously expressed concerns about CBG's implementation of the MoC Procedure, noting that the relative proportions of Category 1, 2 and 3 changes were inconsistent with: i) normal expectations (where Category 1 changes would be the majority); and ii) an earlier register provided in a different format with many more Category 1 changes, suggesting that changes are not being captured consistently across CBG's operational activities. The IESC has seen evidence, in previous site visits, indicating dissemination of the MoC Procedure across CBG's various Departments; however, adherence to the requirements set out within the MoC Procedure was considered to be poor leading to a recommendation in the IESC's March 2021 VSV report that dissemination and awareness training on the MoC Procedure be repeated and that the Quality function (within the HSECQ Department) works more closely with other departments, especially the Procurement Department because many change requests involve the purchase of goods and services. The recommendation to repeat of the dissemination/roll-out would also be valuable for new recruits that have joined CBG since the previous roll-out.

CBG has accepted that the MoC Procedure is not being fully implemented as intended and since March 2021 has drafted an action plan to reinforce the use of the MoC Procedure across CBG's various departments/operations. The IESC understands that the importance of the deficiency has been brought to the attention of the Director General (DG) and he is fully supportive of remedial actions being proposed by the HSECQ Department. Key elements of the plan are as follows:

- Appointment of a MoC Coordinator;
- Definition of actions tailored towards the needs of each department (noting certain departments need more support than others);
- Mandatory monthly departmental MoC meetings in which changes will be discussed and meetings will be minuted;

- Development of a mechanisms to ensure the MoC Procedure is not overlooked/bypassed (possibly via procurement forms/an MoC component when signing off design changes);
- Maintenance of a centralised MoC register that can be accessed by all relevant parties;
- Inclusion of MoC implementation/compliance in Management System audits; and
- Monthly reporting of change requests/application of the MoC procedure to the DG.

CBG reported that the Action Plan would undergo a refinement exercise in the weeks following the VSV before being presented to CBG Senior Management. In parallel, the action plan Owner will be identified.

The IESC acknowledges the measures being taken to improve adherence with the requirements of the MoC Procedure, but nevertheless considers the poor implementation, reported in this and the previous VSV Report, to be a significant issue. Weak adherence to the requirements of the MoC Procedure has also been identified following an internal review of CBG's Management Systems under ESAP Item 1, i.e. similar deficiencies were identified in the Gap Analysis report. CBG should therefore undertake the following as a priority:

- finalise the MoC Action Plan and roll out the measures therein as a matter of priority.
- appoint the Owner of the Procedure/Action Plan and MoC Coordinator with ultimate responsibility for full implementation of the requirements set out in the MoC Procedure.
- share the final MoC action plan with the IESC and Policy Lenders.

The implementation of the MoC Procedure and progress against the actions described in the action plan will be revisited during the next IESC monitoring site visit, likely to be in Q1 2022. Until an improvement is demonstrated by CBG this issue will retain a 'Moderate' significance level and will be elevated to 'High' if progress remains slow at the time of the next site visit

5.7 Dredging

In its March 2021 VSV report, the IESC highlighted that a maintenance dredging campaign would be required in Q3 2021 because of increased sedimentation at the port. At the time, preparations for a dredging campaign were underway and the campaign was expected to be completed ahead of September 2021 to avoid the seasonal constraints. CBG intended to use the same spoil disposal location used in 2020 (the A3 site), subject to results of a bathymetric survey confirming the receiving capacity was sufficient. In the event the A3 site did not have the capacity to accommodate the 2021 spoil and a second larger and previously unused site, referred to as A4 and located further offshore, was identified.

During the October 2021 VSV, the IESC was informed that dredging had occurred. Dredging was undertaken over a two-week period in July 2021. Approximately 350,000m³ of material was dredged from an area of 18ha to allow the ongoing port activities of CBG and GAC (CBG being the port operator responsible for dredging) to continue. The dredging was performed by the same dredging company¹⁶ used in 2020 and CBG confirmed that sediments were deposited at the A3 disposal site, as was the case in 2020.

Dredging is to be carried out in line with CBG's Dredging Management Plan (DMP). Consistent with the DMP, the campaign occurred outside of the sensitive period, CBG undertook bathymetry surveys and produced a turbidity/suspended sediment calibration curve and collected sediment samples from the dredge area. The dredging was subject to CBG's Land Disturbance Permitting process¹⁷. Biodiversity specialist were present during the dredging campaign to spot any marine mammals and similar observations were made by trained members of the dredge vessel crew.

¹⁶ Dredging was performed by Dredging International Services (Cyprus)

¹⁷ Permis de dragage No 2021/01/PD

Turbidity measurements were taken from several locations including downstream (down current) of the dredger and at a distance of 100m. Samples were also taken 100m from the edge of the dredge area. Throughout the dredging campaign turbidity levels remained below threshold levels (<25mg/l) above the background level at 100m from the dredging activity for more than 6 hours) and there was no requirement to halt dredging. However, other requirements set forth in the DMP were not fully adhered to as described below.

DMP requirement	IESC- identified deficiency
A complete environmental characterization of sediment from the dredging area and disposal area (including bioassays if necessary);	<p>In 2021, sediment samples were collected from the dredging area; however, they were not analysed prior to start of dredging activities because contracts with external laboratories were not in place. Of note, toxicity testing might be required if samples are found to have high concentrations of contaminants.</p> <p>Samples were not collected from the disposal area.</p>
A complete characterization of the benthic fauna from the dredging area and disposal area prior to dredging.	A marine survey team is currently on site working on a 1-year survey programme ¹⁸ as part of CBG's wider biodiversity management programme. This team was not in place at the time of the dredging campaign and no benthic survey was undertaken prior to dredging.
Make regular noise underwater measurements around the work area to ensure that sound levels stay below the damaging levels for sensitive species based on the 2016 JASCO report	<p>No underwater noise measurements were taken during the dredging campaign. CBG informed the IESC that it is developing project specific underwater noise criteria based on the marine mammals in the estuary. The IESC supports the approach; however, in the interim CBG should use best practice thresholds based on literature searches/the Jasco Report.</p> <p>Whereas harm to marine mammals from dredging activities is not expected to be likely, noise measurements are nevertheless required to confirm this expectation.</p>
Key Performance Indicators	To date, reporting against KPIs has been poor.

¹⁸ Establishment of Observation and Monitoring Program Wildlife, Marine and Estuary Habitats to Surrounding the CBG Port Zone in Kamsar. Terms of Reference, 19/08/2021

The IESC is aware of several dredging reports that will be produced after the VSV, including reports from the Dredging Contractor and from CBG associated with the July 2021 dredging campaign. CBG's post dredging report has been delayed whilst awaiting results from sediment analysis (contracts with external laboratories have been secured). These reports will be reviewed when available and commentary provided in follow up in IESC monitoring visit reports. The IESC recommends the KPIs set out in the DMP are used in CBG's forthcoming July 2021 Dredge Campaign Report. Stricter compliance with the DMP is also required to avoid a repetition of deficiencies highlighted above. The IESC understands contracts are in place with external laboratories, marine survey work is ongoing and sediment samples will be taken from the disposal sites to act as a future reference. In particular, A4 site sediment samples should be taken to provide a baseline prior to its use in the disposal of future dredged material.

Finally, the DMP was prepared in late 2018 and, according to the DMP, should be reviewed and where necessary revised by CBG every two years. Any material changes to the DMP must be communicated to the Policy Lenders in accordance with the MoC Procedure. The IESC was informed that the DMP is scheduled for a review cycle in early 2022.

Post VSV note: The Contractors Dredging report was received whilst preparing this monitoring report. The IESC is able to confirm the same contractor was used and an understanding of environmental sensitivities is demonstrated through the Contractor's report. The dredging company used the same fuel-efficient dredging vessel used in 2020, as reported on previously by the IESC. Fuel consumption per m³ of dredged materials was less than half that prior to 2020 when less efficient dredgers have been used.

5.8 SMB-W Railway

The IESC provided commentary in its March 2021 monitoring report on CBG's responsibilities and actions with respect to the SMB-W railway, which traverses approximately 10km of the south east area of CBG's South of Cogon concession area and is intended for the transportation of bauxite from SMB-W's concession.

At the time of the October 2021 VSV, construction was complete and the railway operational. CBG has continued to monitor SMB-W's activities, on a monthly basis, working in a collaborative manner¹⁹ with SMB-W and BGEEE to encourage compliance with IFC Performance Standards in accordance with a Memorandum of Understanding between CBG, SMB-W and Government of Guinea (GoG) - represented by the Ministry of Mines and Geology and the Ministry of Environment, Water and Forests.

The IESC has previously reported on construction impacts, including influx management, sales of bushmeat and workers' conditions (see earlier monitoring reports). With the cessation of construction activities and associated impacts, the focus now turns to removal of temporary structures, reinstatement of disturbed land and ongoing operational impacts.

The IESC has been informed of a meeting between CBG and SMB-W in August 2021 in which senior management from both organisations participated. During the meeting, residual non-conformities were discussed and an action plan to address these non-conformities subsequently prepared by SMB-W. A further 2-year action plan has been prepared addressing the dismantling and closure of temporary facilities.

The IESC was also informed, via CBG, that SMB-W has expressed a desire to collaborate with CBG over the life of its operations and, in particular, is keen to work with CBG in the management of biodiversity impacts. SMB-W is reportedly engaging in the Réseau

¹⁹ CBG has no power of enforcement, but can share its findings with BGEEE. For more details see footnote 2.

Environnement Bauxite (REB) initiative²⁰ (See Chapter 10, Biodiversity) and has contracted an external firm to support in this regard.

The IESC acknowledges that SMB-W is a third-party operator in CBG's concession and that CBG lacks any power of enforcement over SMB-W. Nevertheless, it appears that CBG has been able to foster a collaborative relationship with SMB-W and it is hoped the two organisations can continue to collaborate in future years to managing cumulative impacts to biodiversity and other receptors.

At the time of the VSV, CBG did not have access to the two plans mentioned above. Once available their implementation can be monitoring by CBG (and the IESC).

5.9 COBAD Road

COBAD inspections occur monthly (previously was bi-weekly during construction). Key issues from the road's operation relate to faulty toilets (rendering the toilets unusable) and erosion leading to sedimentation of the Lafou river.

In addition to inspection findings, CBG has also been investigating grievances logged in the CBG Grievance Register, including:

- pollution of Bandidji Touguidje river; and
- pollution to a farm from an overflowing sediment basin.

CBG reported that vehicle movements on the COBAD Road did not hinder pedestrian crossings and dust suppression efforts, including use of a chemical dust suppressant product, was effective. The IESC is unable to verify the situation on the COBAD Road and will travel the COBAD Road during the next site visit, assuming that it will be an in-country visit. The status of the aforementioned COBAD Road related grievances will also be explored.

5.10 Contractor management and the Integrated Management System

In the IESC's March VSV monitoring report, the IESC provides an account of the implementation of the Contractor Management Plan (CMP) with respect to incorporation of HSECQ requirements in CBG's procurement process. Although the CMP has been in place since January 2019, CBG has not yet undertaken all actions needed to implement the plan fully. During the October VSV, CBG provide an update on actions underway and planned in order to apply the CMP effectively.

First, CBG appointed, in June 2021, an HSE Coordinator (ex Rio Tinto) with the remit of supporting the HSECQ team on implementing the Integrated Management System (IMS) and the suite of E&S Action Plans (as presented in the E&S Management Plans). In addition, the HSECQ department will appoint soon a CMP Coordinator. This staff member will be responsible for:

- Ensuring existing and new contractor compliance with CMP (checking KPIs and implementation of an audit programme);
- Establishing and maintaining a contractor monitoring register;
- Supporting contractors with incident reports and implementation of remedial action plans; and
- Reinforcing HSECQ capabilities in the procurement process and ensuring that HSECQ and LWC requirements are incorporated into the contractor selection process.

Recently, CBG has allocated its contractors to three categories:

²⁰ The Bauxite Environment Network

- Category 1: Contractors who provide constant 'in-house' support to all CBG operations (such as office cleaners). There are 5 such contractors employing 742 workers. The CMP has always applied to these contractors;
- Category 2: Contractors hired for specific projects such as the MUOA Project. Currently, there are 8 contractors employing 327 workers; and
- Category 3: Contractors that provide specific tasks as/when required; for example, Nitrokemine with respect to blasting. There are 25 such contractors employing 1002 workers.

Going forward, CBG will be reinforcing CMP implementation to contractors in all 3 categories; however, with a focus on categories 2 and 3 as the CMP is being rolled out for these contractors. All contractors will have to comply with the CMP. For category 2 and 3 contractors, CBG will ensure that their HSE Management Systems comply with CBG's. Also, there will be a structured auditing programme with a clear and systematic focus covering compliance and, as necessary, remedial action plans for all contractors.

In early October 2021, the newly-appointed HSE Coordinator began work on an internal IMS audit with the goal of strengthening the IMS and compliance within CBG. The focus is to close the gap between CBG's vision regarding the IMS and its role within the company and the reality of its implementation, by focusing on the following objectives:

- Identification of root causes and structural impediments to effective implementation of the IMS;
- Identification of all risk, followed by an evaluation and targeted control measures; and
- Clarification of all roles and responsibilities of key IMS-focused staff and responsibilities of all employees;

The audit comprises the following key tasks:

- Review of HSECQ documents;
- Internal discussion with other CBG departments;
- Presentation of findings to the HSECQ Committee; and
- Development and then implementation of an improvement plan and programme of actions.

The audit began in early October 2021 and the findings are expected to be available in December 2021. It is intended that the actions will be implemented from early January 2021.

The HSE Coordinator confirmed that there will be a close working relationship with the external consultant commissioned by CBG to prepare the Gap Analysis and subsequent Route Map with respect to the ESAP #1 requirement for CBG, "*... to bring operations up to a level consistent with IFC Performance Standards*".

The IESC supports these valuable CBG initiatives regarding CMP compliance and strengthening of the IMS. The IESC further stresses the importance of formal and targeted audits of contractors against the requirements of the CMP, including audit of both contractors' H&S documentation (pre and post contract award) and actual safe working practices on the ground.

The IESC will revisit the aforementioned initiatives during the next site visit scheduled for Q1, 2022, and in particular the contractors' compliance with the CMP HSEC requirements.

5.11 Emergency Response Planning

During the March 2021 VSV the IESC made the following comments:

1. CBG's HSECQ Department should have greater influence in defining future exercise programmes, taking account of CBG's full spectrum of activities and priority risk areas (to move away from a fire-based scenario bias).
2. The ERP to be revised in recognition of third parties involved/impacted by CBG's emergency response planning. This will include:
 - communication protocols, and
 - in the case of oil spills (and other scenarios as applicable), the sharing of response resources.

In the October 2021 VSV, the IESC met with representatives from the HSECQ Department and the Fire Department. With regards to the first of the findings above, the exercise scenarios for 2021 were discussed and representative from the Fire Department acknowledged the importance of involving the HSECQ when developing response scenarios.

With regards to the second finding, the IESC was informed that: i) a Communications Plan is currently being prepared by an external consultancy; and ii) contact details for GAC and COBAD have been included in the ERP and future incident scenarios will include collaboration with GAC and COBAD. In respect to the Communications Plan, this issue is being tracked separately as part of ESAP monitoring and is not repeated as an action in this monitoring report.

CBG noted that several meetings had taken place with GAC and there is sharing of response resources, however at the current time GAC has limited equipment/resources for dealing with incidents.

CBG also reported procurement of two new well-equipped ambulances in June 2021; one for Kamsar and the other Sangarédi. The new ambulances will be used to supplement the existing ambulances. Furthermore, CBG was planning a 'Full-Scale' exercise for the end of 2021, involving multiple organisations, for example, AMAIM hospital, Police, GAC. The full-scale exercise will be managed by an external consultancy, with emergency scenario and findings of the exercise being prepared by the consultancy.

Table 5-3: Summary of Findings, PS1

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
October 2021_001	Management of Change	Progress has been made to address the findings of the March 2021 VSV Report, and CBG has a draft action plan in place to address poor adherence to the MoC procedure. However, CBG is in the early stages of implementing the remedial actions and material improvements have not been seen at the time of the October VSV.	All	CBG to finalise the MoC Action Plan and roll out the measures therein as a matter of priority. The Owner of the Procedure/Action Plan and MoC Coordinator to be appointed with ultimate responsibility for full implementation of the requirements set out in the MoC Procedure. The Action Plan should be shared with the IESC and Policy Lenders.	Moderate
October 2021_002	Contractor management and the Integrated Management System	Although the CMP has been in place since January 2019, CBG has not yet undertaken all actions needed to implement the plan fully. CBG appointed, in June 2021, an HSE Coordinator with the remit of supporting the HSECQ team on implementing the Integrated Management System (IMS) and the suite of E&S Action Plans (as presented in the E&S Management Plans). In addition, the HSECQ Department will appoint soon a CMP Coordinator.	All	The IESC supports current initiatives regarding CMP compliance and strengthening of the IMS, noting the CMP coordinator will be responsible for ensuring contractors comply with CBG's requirements. The IESC further stresses the importance of a comprehensive and targeted audit of contractors against the requirements of the CMP, including audit of both contractors' H&S documentation (pre and post contract award) and actual safe working practices on the ground.	High
October 2021_003	CR team recruitment	The appointment of the Database specialist by the end of Q3 2022 and the expectation that IsoMetrix will be functioning fully by end of Q1 2022 means that there will be a six-month period when IsoMetrix will not be used to its full potential.	All	Consider bringing forward the appointment of Database specialist so that the gap between the Database specialist being employed and a fully functioning IsoMetrix is reduced to the maximum extent possible.	Moderate
October 2021_004	CR team: resources	The CAO process requires periodic high-intensity support on the part of the CR Manager and CR Surintendant and is likely	All	Consider renewal of the ACORN International contract, if it seems likely that the CAO process will extend beyond July 2022	Minor

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
		to continue for the for the next six months (possibly longer).			
October 2021_005	CR team: resources	Acquisition of certain of digital equipment items (hardware and software) were delayed in 2021 year-to-date. Others were 'on track' as of end September 2021	All	Ensure that there are no procurement delays affecting the acquisition of these 'on track' items	Minor
October 2021_006	CR team: training	Several training events have been delayed by potentially up to one year and dates for these events have not been agreed with the provider. There is an opportunity for the CR Manager to consider actions that could be adopted to improve training outcomes while minimizing disruption to workloads.	All	Consider: <ul style="list-style-type: none"> • Planning and organizing staff time so that there is minimum disruption to workloads while fulfilling training commitments. Possible options include careful selection of personnel to be attending specific training events, scheduling events so that one event immediately follows another ('back-to-back' sequencing) and providing incentives for some training to be undertaken outside standard working hours; • Applying the 'train the trainer' model where only one or two staff members attend a training event and then they train their colleagues on the key principles and/or practices in shorter subsequent training events; and • In the context of future training needs for the period 2023 – 2024; selecting fewer key training topics/events (perhaps a maximum of 10 topics/events) 	Moderate

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
October 2021_007	NoCo Exploration	Contractors are likely to require temporary rights to use/occupy land for facilities such as, but not limited to, fly-camps and laydown areas.	Exploration	Ensure that contractors acquire agreements, with all affected land rights-holders, for use and/or occupancy of land for facilities such as, but not limited to, fly camps and temporary laydown areas, in a PS 5-compliant manner	Moderate
October 2021_008	Revision of Environmental Management Plans (and Procurement)	<p>The planned revision of certain Environmental Management Plans is overdue and implementation of actions specified within Action Plans are behind the original 2019 schedules.</p> <p>Reliance on the import of specialist equipment, exacerbated by a slow procurement process, has delayed the execution of E&S actions specified in the Management Plans.</p> <p>The recommendation made during the March 2021 VSV remain valid.</p>	All	<p>CBG should conduct a review of its procurement process in order to identify opportunities to expedite procurement of goods and services across all E&S disciplines.</p> <p>See also Appendix 3.1, March 2021_007.</p>	Moderate
October 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.	All	<p>Consider implementing one or more of the following options:</p> <ul style="list-style-type: none"> • Identifying informal/formal female associations in the villages such as womens’ farming/gardening groups and then organizing meetings; • Organizing meetings in the fields where groups of women may be working together (in rest periods and not interfering with work regimes); and • Random walks in villages and to/from agricultural areas to engage in informal conversations with individuals or small groups of women 	Moderate

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
October 2021_010	Grievance mechanism	The community grievance mechanism is not functioning effectively (low annual number of grievances recorded for past five years)	All	The community grievance mechanism to be reviewed and revised, as appropriate, within the context of preparation of the SEP 2022-2025.	High
October 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	All	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
October 2021_012	Dredging	<p>The 2021 dredging campaign did not strictly adhere to certain actions set out in the Dredge Management Plan. In 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>	Operations	<p>Stricter adherence with all applicable the requirements of the DMP is required in 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>	Moderate
October 2021_013	Land Rehabilitation and Relinquishment	CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues, despite the MRCCP presenting priority actions to begin by end 2018 (with one to be completed by end 2018)	Operations and Decommissioning	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,	Moderate

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				presented in the MRCCP, relevant to mined land rehabilitation and relinquishment	

6. PERFORMANCE STANDARD 2: LABOR AND WORKING CONDITIONS

6.1 Introduction

This October 2021 VSV report focuses upon four LWC topics:

- Occupational health and safety (including COVID-19 measures);
- Employment and employees:
 - HR documents and dissemination; and
 - Worker grievances management;
- LWC issues in contractor management; and
- Workforce demobilisation.

Key findings are presented on each of these topics below.

6.2 Occupational health and safety

6.2.1 HSE Performance

The IESC has been unable to visit CBG’s facilities since 2019 to inspect safety practices first-hand. For the VSV, HSE performance statistics for the year 2021 through to August 2021 were shared with the IESC (Figure 6-1). The figures for 2021 for all activities (including CBG and Contractor personnel) are generally favourable or comparable with earlier metrics and targets, noting also that CBG’s TRIFR target during the Expansion Project was 0.4²¹. There was however the first fatality in 2021 since 2018.

		2018	2019	2020	2021
A- Recordable injuries	<i>Fatality</i>	1	0	0	1
	<i>LTI cases</i>	3	4	8	2
	<i>Restricted Duty Cases</i>	2	3	5	3
	<i>Medical treatment cases</i>	6	9	3	3
Total recordable injuries		12	16	16	9
(TRIFR)	<i>target</i>	0,21	0,20	0,19	0,19
	<i>12 Mts rolling average</i>	0,18	0,21	0,21	0,20
B- Non recordable injuries	<i>First Aid</i>	38	59	35	16
Total Injuries(= A + B)		50	75	51	25
TIFR	<i>Target</i>	1	0,9	0,88	0,80
	<i>12 Mts rolling average</i>	0,59	0,80	0,87	0,52
Total worked hours		13 157 196	13 195 162	12 607 677	8 1519 42

Figure 6-1. HSE metrics 2018 through to August 2021

²¹ CBG’s target is reportedly more stringent than industry norms for mining companies including neighbouring bauxite mining companies.

In 2020 CBG recorded a disproportionate incidence of accidents resulting in injuries among its contractors, with first aid cases showing the greatest disparity. In 2021 (through to September) the total number of injuries involving contractors had reduced such that performance statistics for contractors were more comparable with that for CBG staff (Figure 6-2).

2020				2021			
Injuries classification	Contractors	CBG	Total	Injuries classification	Contractors	CBG	Total
First Aid	24	11	35	First Aid	10	6	16
Medical Treatment Cases	1	2	3	Medical Treatment Cases	2	1	3
Restricted Duty Cases	2	3	5	Restricted Duty Cases	1	2	3
LTI)	4	4	8	LTI)	0	2	2
Fatality	0	0	0	Fatality	0	1	1
TOTAL	31	20	51	TOTAL	13	12	25
Total injuries including FA	61 %	39%		Total injuries including FA	52 %	48%	
Recordable injuries	44%	56%		Recordable injuries	33%	67%	

Figure 6-2. Comparative number of injuries for CBG and Contractor staff

6.2.2 H&S Training in 2021

CBG continues to reinforce the importance of safety through training programmes. In 2021 this included the training of 700 CBG and Contractor employees by an external training firm on specific occupational hazards including working at height, confined spaces, lifting, sling use, electrical isolation and electrical authorisations.

CBG also implemented additional training for workers on the MUOA Project following the violation of health and safety rules. The training, intended to reinforce a message of zero tolerance of H&S violations, was attended by CBG Directors.

6.2.3 HSECQ Inspections

CBG has a schedule of H&S audits and inspections as follows:

- External (regulatory) inspection of CBG lifting and handling equipment by Bureau Veritas on an annual basis.
- Internal quarterly inspection of safety aspects for all conveyors in the plant.
- Directors’ monthly inspections on a cross departmental basis (average 6 audits per month) in which Directors team up with HSECQ specialists to participate in the audit.
- Internal audits (61 through to September 2021).

CBG has approximately 10 dedicated H&S specialists in the HSECQ department (excludes contractors’ H&S professionals).

6.2.4 Worker fatalities

As indicated above, at the time of the VSV, CBG had reported a fatality that occurred in late August. The IESC has since received a detailed incident investigation report that indicates the deceased was an experience CBG employee who broke a number of safety rules that would have prevented the fatality had they been followed.

Policy Lenders have received the full incident report separately and therefore no further details of the incident are provided in this report. The IESC does however reemphasise the need to promote health and safety above all other work demands. The IESC also recommends CBG to explore whether this breach of safety rules was an isolated incident, or other safety breaches are occurring across CBG's operations (noting reference to H&S violations on the MUOA Project). Further measures to incentivise good H&S behaviour should be explored in parallel to strengthened disciplinary measures aimed at dissuading poor behaviour. The IESC recognises the work done by CBG to foster a safety-first culture, however serious incidents mean that CBG must always strive to improve H&S performance across its operations.

The IESC recommends a detailed review of H&S practices, inclusive of visual observations and interviews with different staff grades, during the next in-field site visit scheduled for Q1, 2022. In the interim CBG should identify the reasons why health and safety rules have been breached and opportunities to eliminate the occurrence of similar breaches in the future. CBG should also further promote the use of the Stop Work Authority and consider mechanisms to encourage the use of the Stop Work Authority.

Post visit note: Two further fatalities were recorded in 2021 shortly following the VSV. The IESC will examine the causes of these incidents in detail during to next site visit and in particular look at what, if anything, could have been done to prevent the incidents and review the adequacy of the corrective measures put in place by CBG to minimise the likelihood of repeat incidents.

6.2.5 Material authorisations

IESC requested a register of material authorisations. No environmental authorisation were found to be overdue at the time of the VSV. In particular, a noise permit that was noted to be due to expire, was issued on the 12th October 2021 (at the time of the VSV).

6.2.6 Personal protective equipment

In CBG's 2020 Annual Monitoring Report several issues raised by labour unions are presented. One of these topics concerned delays in obtaining, from overseas, personal protective equipment. CBG informed the IESC that delays were due, primarily to logistics issues arising from COVID-19 induced impacts on global supply chains. CBG has taken measures, such as establishing of framework contracts with suppliers, to avoid this situation in the future. However, obtaining goods, sourced from overseas, is still a challenge for CBG.

6.2.7 COVID-19

Procedures for minimising the risks of COVID-19 transmission have been described in earlier monitoring reports and are not repeated here.

The number of reported COVID-19 cases in Guinea remains relatively low with 177 cases in Kamsar at the time of the audit. Two deaths have been reported by CBG including an employee and an employee's dependant. Reportedly, 98% of CBG's employees have been vaccinated.

The IESC previously reported its concern that zero COVID-19 cases had been reported by CBG's contractors despite it being a mandatory requirement for contractors to report health and safety statistics, including COVID-19 infections, with the recommendation CBG reiterated its reporting expectations. During the October visit, CBG reported 32 cases amongst just two contractors. It is therefore recommended to continue efforts to gather COVID-19 related statistics from all its contractors.

COVID-19 restrictions at a national level continues to impact CBG's activities and has led to numerous challenges including the supply of goods and services challenges discussed in other sections of the report.

6.3 Employment and employees

In line with ESAP requirements, CBG finalized the following documents (mid Q1 2021):

1. Human Resources (HR) Manual;
2. Workers' Grievance Mechanism (WGM); and
3. Code of Ethics and Business Conduct (the Code of Ethics).

The ESAP requires that these three documents be disseminated, "...to all CBG direct employees and contractors." During a meeting with representatives of the HR Department, the IESC was informed that dissemination to employees was completed; however, only partial progress was made in terms of dissemination to contractors. CBG informed that it is in the process of updating its 'approved suppliers list' and is waiting for completion of this update before sending the documents to contractors. In the interim, copies of these documents are provided to potential contractors as part of the procurement process with the Code of Ethics being appended to all Requests for Proposals (RfPs) issued by CBG. *Post VSV Note: CBG provided satisfactory evidence to the IESC of dissemination to contractors.*

6.3.1 Code of Ethics and Business Conduct

The Code of Ethics has been disseminated to direct employees via several means, including the Intranet, employee inductions, and CBG's internal 'compliance' training programme (70% completed). Dissemination efforts aimed at contractors are not as systematic. Once the approved suppliers list' is updated and functioning, then all approved suppliers will be sent, automatically, a copy of the Code of Ethics and new suppliers will also get a copy automatically once they are 'approved' and are included in the list. In the interim, CBG is considering several initiatives to assist dissemination, as follows:

- Providing a link to the Code in every Purchase Order issued by CBG;
- Improvements to functionality of the Extranet (currently it is slow). However, suppliers are not necessarily aware that the Code can be downloaded so this information needs to be communicated to them; and
- Inviting groups of suppliers to participate in the remaining internal 'compliance' training events.

6.3.2 Workers' Grievance Mechanism

The CBG-wide WGM continues to operate. At the time of the March 2021 VSV, only a few grievances were submitted. Since the March 2021 VSV, the logistics of collecting grievances from the grievance boxes has eased due to relaxation of COVID-19 restrictions. However, workers are reluctant to use the boxes and no grievances have been collected from the boxes. Employees prefer submitting grievances or compliance-related complaints via a personal route, primarily the sector *Conseiller en Relations du Travail* (of whom there are five throughout CBG and whose function is to liaise between the Departments in their sectors and the HR Department) or a supervisor. At the time of the October 2021 VSV, the IESC was informed that 22 grievances had been received in 2021 to date (the first year of WGM operation). Table 6-1 provides a breakdown of these grievance. By far the largest proportion of grievances relates to issues arising from qualifications and job status. Also, 17 grievances were still 'in progress' toward a resolution and closure. Now that the WGM is operating, data will be obtained during all subsequent site visits allowing performance to be tracked systematically.

Table 6-1: Employee grievances 2021: Grievance type, number/type and status

Grievance Type	# Grievances	Status
Remuneration (such as salaries and allowances)	2	Completed
Promotion issues	1	Completed
Recognition of qualifications and job status	17	In progress
Family problems	1	Completed
Employee performance evaluations	1	Completed
Total	22	

Given the time that has elapsed since finalization of these three documents, it is recommended that CBG accelerate the process of dissemination to contractors by identifying the contractors on site (those that fall into the definition of a contractor as presented in PS2). Subsequently, CBG should send each contractors a standard covering email (with the three documents attached), explaining the role of each document with CBG’s expectation that the contractor will comply with their requirements for the duration of its existing contract/s with CBG. *Post VSV Note: CBG is in the process of contacting on-site contractors following the steps/approach outlined above.* Going forward, it is recommended, further that CBG designs an action programme on how it will apply the relevant PS2 requirements to its suppliers (as defined in PS2).

During the March 2021 VSV, there was a meeting with a representative of the National Confederation of the Guinean Workers to discuss selected LWC topics from a trade union perspective. During the October 2021 VSV, the IESC sought the CBG perspective on issues discussed by union officials. CBG management meets regularly (usually monthly) with labour union officials. These meetings are organized by the HR Superintendent (who also attends) with the HR Director invited as/when necessary. There are, also, meeting arranged when necessary to discuss important issues as they arise.

6.4 LWC issues in contractor management

The March 2021 VSV report contains an account of procedures in place to ensure that LWC issues are considered in contractor management, specifically the selection of contractors. It is stated, also, that the wider issue of on-site contractor supervision via a regular monitoring/auditing procedure would be investigated in more detail during the next site visit (that is, the October 2021 VSV). The draft itinerary for the October 2021 VSV included a session on this topic, but it was removed when CBG informed the IESC that CBG had not yet implemented a LWC contractor audit programme and that a new HSECQ post will be dedicated to managing contractor audits. This was confirmed in the opening session of the October VSV (see Section 5.10 above).

The March 2021 VSV report presented the following key finding regarding consideration of LWC requirements in selection of contractors. It was found that LWC requirements are the responsibility of the HR Department (and to a lesser extent the Compliance Function) and are not within the remit of the HSECQ and Procurement and Logistics departments. Currently, there is no

clearly defined role or pathway by which the HR Department can provide its oversight to ensure that PS2 requirements are:

- 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
- 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'.

In this context, the recommendations in the March 2021 VSV report are repeated here:

- The bid evaluation process to be 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' decision/s;
- HR Department to designate senior staff member to receive PS2 training to assist it fulfil its role in the contractor selection process. and subsequent contractor management;
- All requirements to be placed on contractors to be consolidated into the Contractor Management Plan (rather than be presented in multiple documents) at the next review and revision of the Plan or by end Q1, 2022, whichever is the earliest; and
- The HR Manual, WGM and Code of Ethics to be provided in all RfPs (it is noted that the Code of Ethics is now included in all RfPs).

The supervision of contractors, with respect to LWC issues/requirements and the implementation of these previous recommendations relating to contractor selection will be investigated in the forthcoming site visit which is likely to occur in Q1 2022. During the VSV, the IESC learnt that a new HR Director had been appointed and had been in post for only a few days prior to the VSV. *(Post-VSV Note: The IESC was informed that the new HR Director wishes to discuss this issue during the next site visit in Q1 2022).*

6.5 Workforce Demobilisation

Since the introduction of a requirement for worker demobilisation plans to be prepared (for contractors via amendment to the Contractor Management Plan, Rev. 02 of 20 November 2020), as necessary, CBG confirmed that no such plans had been prepared to date. In addition, CBG confirmed that it had no influence on SMB's demobilisation practices.

Table 6-1: Summary of Findings, PS2

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
October 2021_014	H&S Performance	Three worker fatalities have occurred in 2021 compared to zero in 2020 and 2019.	All	<p>The IESC understands the events leading to each of these avoidable fatalities and understands that the breach of H&S rules was a significant contributory factor. A detailed review of H&S practices and performances should be undertaken by an IESC H&S specialist during the next site visit. The review shall examine adequacy of training programmes, procedures, the influence of hierarchy (related to stop work authority), implementation of procedures and 'on the ground' practices across CBG operations and activities (including Contractors' behaviours) and other organisational factors in order to identify any opportunities for system and/or behavioural improvements.</p> <p>CBG should continue with detailed investigation of the three incidents to identify: i) the reasons why health and safety rules have been breached and opportunities to eliminate the occurrence of similar breaches in the future and ii) opportunities to improve the H&S Management System/Procedures.</p> <p>CBG should also further promote/incentivise the use of the Stop Work Authority and consider mechanisms to encourage the use of the Stop Work Authority. For example, consideration of mobile Apps that are now available.</p>	High
October 2021_015	Dissemination of the HR Manual, WGM and Code of Ethics	Actions have been taken to disseminate these three documents to employees and contractors, but dissemination is not complete.	All	<p>Accelerate the process of dissemination to contractors by identifying the contractors on site (those that fall into the definition of a contractor as presented in PS2). Subsequently, CBG should send each contractor a standard covering email (with the three documents attached), explaining the role of each document with CBG's expectation that the contractor will comply with their requirements for the duration of its existing contract/s with CBG.</p>	Minor

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
October 2021_016	Management of suppliers	The roll-out of LWC requirements does not yet extend to suppliers	All	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
October 2021_017	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 • 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'. 	All	<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 • The HR Manual, WGM and Code of Ethics to be provided in all RfPs. 	High

7. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

7.1 Implementation of environmental management plans

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 following plans are considered: environmental monitoring, air quality, water quality, noise and vibration, resource use and energy efficiency, waste management, and hazardous materials management.

7.2 Environmental Monitoring

The March 2021 IESC monitoring report highlighted a number of priority actions, including: i) the relaunch of the comprehensive environmental monitoring programme; ii) improved data management via procurement of a new database; iii) recruitment of additional team member(s); and iv) disclosure of information to communities. A status update against each of these priorities is provided below.

Relaunch of the environmental monitoring programme

CBG conducts environmental monitoring in accordance with its Environmental Monitoring Programme (EMoP) (D390-MOT-PLN-0033 EN v00 Rev002). However, analysis of samples has been significantly hampered since the cessation of contracts with external laboratories in late 2019, during which CBG has relied on the more limited analytical capabilities of its internal laboratories/equipment.

The IESC has previously been informed of CBG's intention to commission Africa based laboratories (previously CBG had a contract with a Canadian laboratory) to save both cost but also time in the transportation of perishable samples. At the time of the VSV, CBG confirmed:

- a contract had been signed with Proslabs Microbio Consulting SARL (Mali) for the analysis of water and sediments;
- the signing of a contract with Skyside, based South Africa, allowing for the analysis of air quality samples, was imminent;
- a contract has recently been signed with Sentec, based in Senegal, for the repair and maintenance of the fixed AQ monitoring station in Kamsar and meteorological stations in Kamsar and Sangarédi.

The contractual agreements are a significant development that have allowed CBG to recommence its comprehensive sampling programme. At the time of the VSV, samples had recently been collected and dispatched for analysis but the results were not available.

CBG has also procured new sampling equipment, reducing the reliance on limited and/or malfunctioning equipment (See Section 7.5, Noise and Vibration).

Data management

Data management is heavily reliant on the use of spreadsheets and therefore has a number of limitations. As reported previously, CBG is looking to procure a new data management system and evaluation of the most appropriate system is ongoing. The CBG EMTL is currently being supported to the CBG shareholders (Rio Tinto and Alcoa) in his decision. With laboratory contracts now in place, and with the anticipated increase in monitoring data, procurement of the database should be expedited.

Recruitment of additional team member(s)

In the previous VSV report the IESC reported on CBG's intention to recruit an additional team member to support the environmental management efforts. The EMTL remains of the opinion that the team is under resourced and anticipates resourcing levels will be reviewed as part of a wider evaluation being undertaken under ESAP Item #1, the Gap Analysis and Road Map. The IESC has observed an expanding monitoring programme in terms of sampling locations/parameters²² over recent years and also anticipates an increasing workload with the resumption of sample collection for analysis by external laboratories/data management. It is therefore recommended that a Needs Analysis (considered evaluation of current and future resourcing levels, roles and capabilities) is undertaken within the environmental management team in recognition of the anticipated increased workload.

Disclosure of monitoring results

CBG committed within its management plans to disclose the results of its environmental monitoring to affected communities, however, to date there has been limited disclosure of sampling data (mainly noise and vibration measurements associated with blasting events), in part because of the limited analytical capacity reported above. CBG remains committed to the disclosure of results and the Environmental Monitoring team is working alongside the Community Relations team to develop an appropriate form and content for reporting to communities. Such reporting of results must be consistent with the commitments made in the Stakeholder Engagement Plan as described in the IESC's July 2020 monitoring report. The reporting will also be required if CBG is to be certified as a member of the Aluminium Stewardship Initiative (ASI) in 2023.²³

Revision of the Environmental Monitoring Programme (EMoP)

The EMoP was revised in 2020 to take account of additional sampling requirements relating to the MUOA Project and provision of drinking water at the new Hamdallaye village site. A further review and revision is planned for late 2021, although this will be informed by the results of upcoming sampling data and is now scheduled for 2022. In the interim, sampling locations are continuously under review to accommodate the opening of new plateaux.

7.3 Air Quality

7.3.1 Status of AQMP implementation.

The Figure below provide a graphical summary of the status of implementation for the Action Plan embedded within the Air Quality Management Plan (AQMP). The graphic shows the HSECCQ Department has responsibility for the three actions that are delayed relative to the original timeframes set out in the 2019 AQMP.

²² Includes additional samples as plateaux are opening for mining, water quality from wells at Hamdallaye and other communities and increased frequency of oil in water sampling.

²³ CBG is aiming for certification in 2023 but will produce a Sustainability Report that is compatible with ASI requirements in mid-2022. CBG will be supported by Alcoa and an external consultant when producing the Sustainability Report.

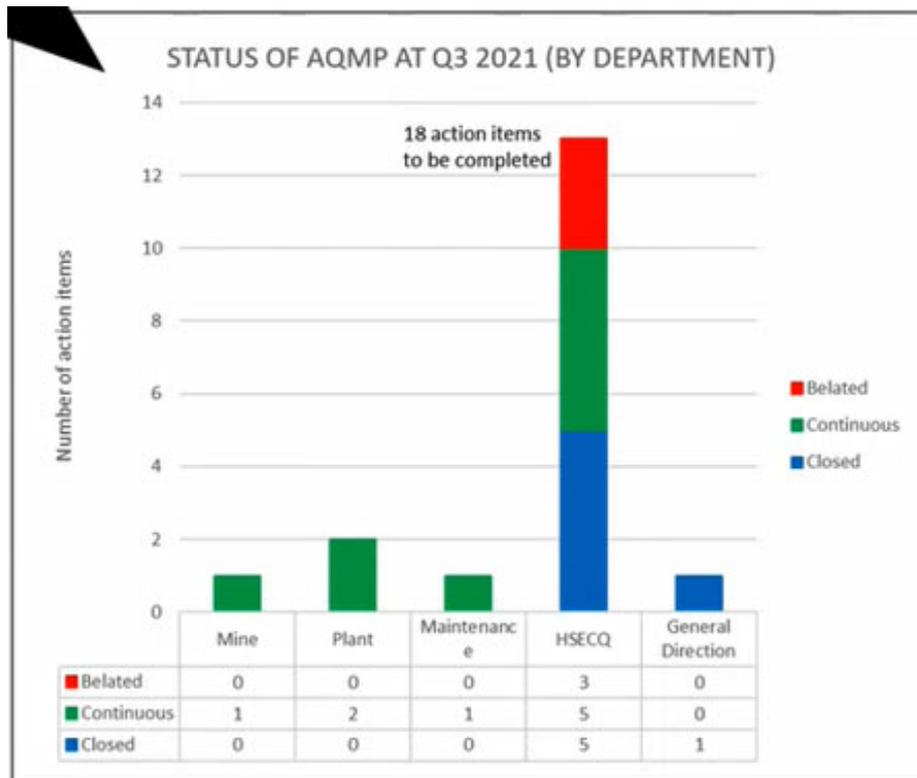


Figure 7-1. Status of AQMP in Q3, 2021

In the preceding March 2021 Monitoring Report the IESC reported on: i) Stack emission monitoring and finalisation of the AQMP; ii) ambient air quality monitoring; and iii) dust suppression. These issues are revisited in this report and status updates provided where applicable.

7.3.2 Stack emissions testing and finalisation of the AQMP

An Air Quality Management Plan (AQMP) was prepared in January 2019, however the plan 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, noting that EHS General and Industry Sector Guidelines do not provide in-stack emissions limits that can be applied readily to bauxite dryers.

Stack testing of emission sources under differing operating conditions, and in particular the four bauxite dryers, is a requirement of the ESAP and was considered a prerequisite to the development of dryer-specific emission limits²⁴.

Stack emissions testing of the operational dryer stacks (1-3) was conducted in 2019, however, as described in the previous IESC monitoring report, the data gathered during the 2019 sampling campaigns was not sufficient to inform stack emission limits and to finalise the AQMP. CBG therefore decided to undertake additional stack emissions testing in 2020, although this did not occur largely because of COVID-19 travel restrictions (the Canada based consultants were unable

²⁴ Lenders agreed that specific emission limits could be 'back calculated' using modelling techniques, provided modelling was based on reliable input data including ambient air quality data and the operating parameters of the dryers (temperatures, discharge volumes, discharge exit velocities etc.).

to travel to Guinea). The stack emission sampling, inclusive of separate dry and wet season sampling campaigns, was therefore further postponed until 2021.

In 2021, stack emissions testing was conducted during the dry season between 9 June and 24 June. The campaign included sampling of Dryers 2, 3 and 4, the incinerator at Tora Bora waste facility, certain engines stacks and the boiler at the Kamsar power station. Dryer 1 was not sampled because it was non-operational at the time of the dry season campaign (scheduled to restart in May 2022). In addition to the inability to sample Dryer 1, other challenges were as follows:

- Dryer 4 was only operating at approximately 50% of its design capacity, whereas the sampling methodology chosen requires 90% of capacity. Data is not readily scalable according to CBG's stack monitoring consultant.
- Dryer 4 was missing some sensors at the time of the sampling making it difficult to record the operating parameters. The sensors have since been installed.
- CBG's stack monitoring consultant intended to return in September/October 2021 to complete the wet season sampling campaign. At the time of the VSV, the remaining window of opportunity available to capture the wet season sampling was limited and it has since become apparent that the consultant was unable to travel and perform the wet season campaign in 2021²⁵. The wet season sampling campaign must therefore be postponed until the next wet season in September/October 2022) resulting in a knock-on delay for the finalisation of the AQMP.

At the time of the VSV the stack emission report was not available but has since been made available in time for this reporting. Dry season results show total particulate matter ranging from 200-223 mg/dsm³ in Dryers 2-4.

Whereas CBG intends to implement the requirements of the ESAP, it cannot meet the previously agreed timeframe for a finalised AQMP (inclusive of dryer-specific emission limits) by the end of 2021. An agreement should therefore be reached with Lenders to extend the timeframes taking into consideration any conditions and/or interim deliverables, noting that interim stack emission limits for the bauxite dryers could be derived from the 2021 dry season emissions data, dryer 2-4 operating parameters and ambient air quality measurements that are due in early 2022 following the relaunch of ambient air quality monitoring (see Section 7.2.1).

Assuming wet season sampling takes place in 2022, this will provide an opportunity to capture emissions sources that could not be sampled in 2021, including Dryer 1 and power generating units at the Sangarédi, Batafon, Filima and Kamsar power plants.

7.3.3 Air quality monitoring data

See Section 7.2.1. detailing the restart of ambient air quality monitoring following finalisation of new contracts with external laboratories/companies. In addition to the above, CBG has also revised its AQMP to include additional monitoring of fugitive emissions, primarily particulates from bauxite handling activities. Pending the results of this additional monitoring, corrective measures will be put in place to reduce fugitive emissions of particulates.

7.3.4 Dust Suppression

The IESC has previously reported CBG's plans to use chemical suppressants on haul roads (rather than water alone) and the procurement of a bitumen emulsion dust suppressant for trials²⁶. The

²⁵ A military coup in September 2021 resulting in postponement of the consultants travel to Guinea.

²⁶ Product name is Anionic Bitumen Emulsion (SS60). MSDS states practically non-toxic, LC/EC50>100mg/l, although should be kept away from watercourses.

outcome of the tests was unclear at the time of the VSV and it is therefore recommended that CBG’s position is made clear to Lenders, with details of any chemical dust suppressants made available to the Lenders via the agreed Management of Change Procedure.

7.3.5 Decommissioning of electrical generators, Kamsar

Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators located in the Kamsar central powerhouse by 2020. The IESC understands the old generators are no longer being used, however, they have not been decommissioned. CBG should explain why the power generators, if no longer required, have not been decommissioned to date.

7.4 Water Quality

This section provides an update on the implementation of the Water Management Plan (WMP), including the status of priority actions described in previous IESC monitoring reports.

7.4.1 Overview of progress against the Water Management Plan.

Figure 7_2 provides a crude overview of the progress made against the action items within the water quality Action Plan. The water quality Action Plan sits within one of the larger environmental Management Plans and also has the largest proportion of actions that are behind the schedule developed in 2019. Multiple reasons for the delays have been discussed elsewhere in this report/previous IESC Monitoring Reports and are not repeated here.

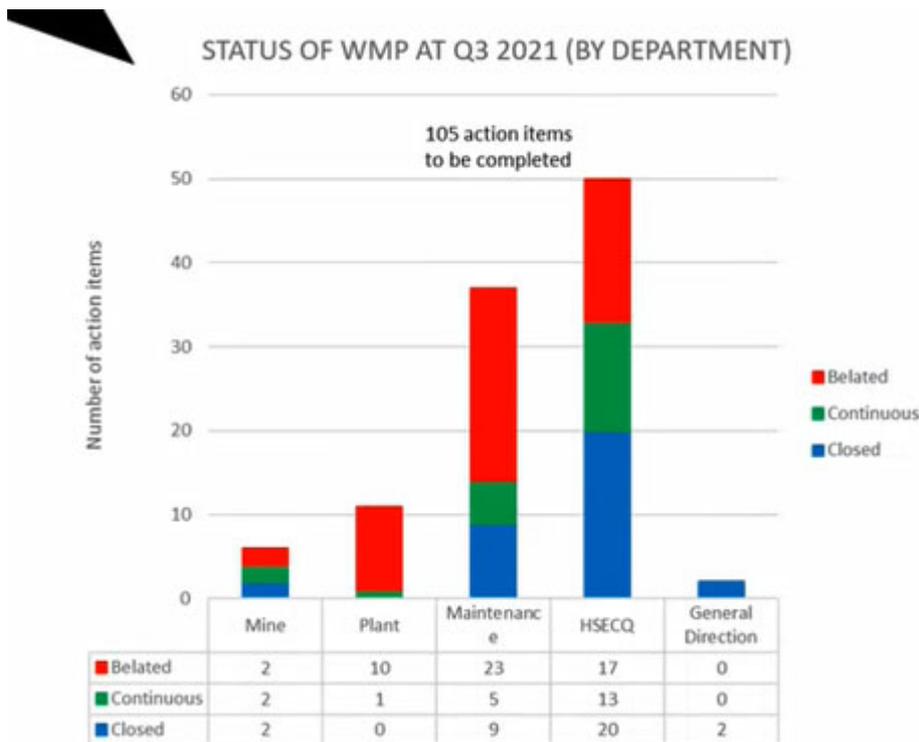


Figure 7-2. Overall progress against the Water Management Plan

Key projects that have been ongoing during 2021 and in some cases will continue through 2022 are listed below.

- Improvements to the Oil Water Separator, Kamsar.
- Reduction of residual aluminium levels in drinking water at the Cogon water treatment plant (WTP).

- Upgrades to the N'Dousy wastewater treatment plant (Sangarédi) including UV plant installation, infrastructure, sludge management and water reuse.
- Discharge the sea of untreated wastewater at the Kamsar WWTP.
- Water quality of mine effluents.
- Impacts of mining activities on hydrogeology.

Status updates/progress since the March 2021 monitoring report is provided below for these key projects.

7.4.2 Oil/water separator at tank farm (Kamsar)

The IESC has previously reported in successive Monitoring Reports oil concentrations that exceed Guinean (50ppm) and IFC (10mg/l) oil in water limits in treated effluent discharged from the main oil/water separator system (a series of separators working in sequence) located at the tank farm in Kamsar (Figure 7-3). A number of initiatives to reduce oil concentrations were described in the March VSV resulting in a significant reduction in oil concentration. However, despite this reduction the concentration of oil in the discharge remained significantly above the more stringent IFC limit.

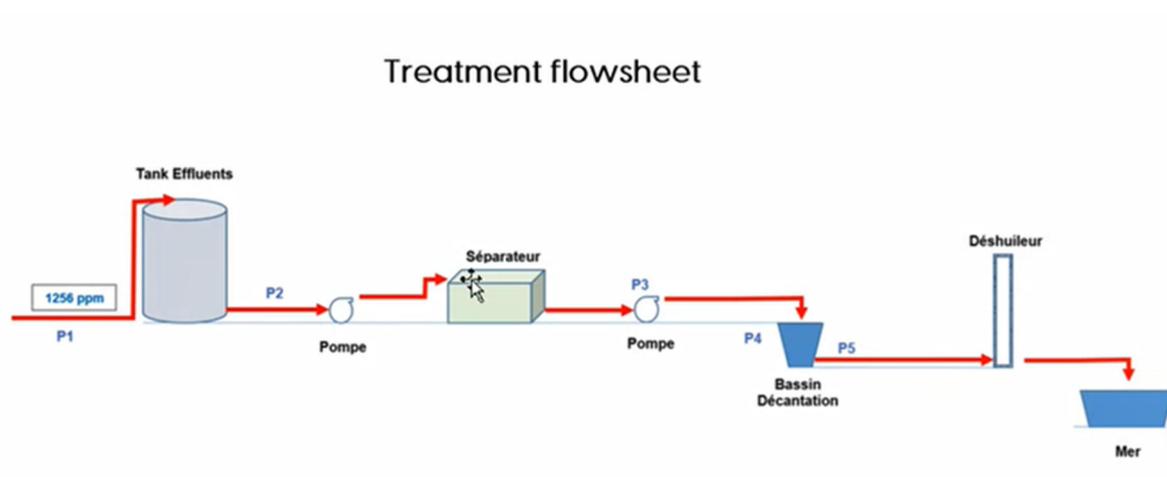


Figure 7-3. Simplified representation of the oil water separator system

An ongoing three-phase approach has been adopted to achieve compliance as follows:

- Phase 1 – internal review of waste oil management practices and short-term technical solutions, for example, changing the band separators to improve oil recovery rates.
- Phase 2 - appoint an external consultancy to undertake a detailed audit by of the entire system, from the waste oil generating practices through to process engineering, with recommendations for technical improvements.
- Phase 3 – design and implementation of technical improvements.

In this report status updates are provided against each of these phases.

Phase 1 status update

A multi departmental steering committee comprised of maintenance, CFB, Engineering and HSECQ has been convened to identify issues and measures to improve the quality of treated effluent. One of the key tasks for the committee was to identify sources of oil being sent to the Oil Water Separator (OWS). These sources originate primarily from the locomotive workshop and the power station (Figure 7-4)



Figure 7-4. Aerial image showing location of oil generating facilities and effluent system (white lines)

More specifically, 4 sources of oil are identified from the locomotive workshop and 10 from the power station. The primary sources of oil from these two locations were identified as follows:

At the **power station** a major source of oil was produced during the centrifuging of fuel prior to use in the power plant. Fuel separated and deemed unusable by the generators was sent directly to the OWS. This fuel should have been collected separately rather than sent to the OWS for treatment. Large quantities of oil are also collected from the electricity generators because of operational problems being experienced. This oil was also being routinely sent to the OWS (when it could have been collected at source).

At the **locomotive workshop** pumps intended to send oil directly to a mobile collection tank (rather than to the OWS) were found to be broken. A cracked waste oil pipe located within a surface water gully was also identified to be leaking. The leakage had no impact on the OWS, but nevertheless needed to be fixed as it led to direct release of oil contaminated water via the surface water drainage system.

At the OWS system a number of factors leading to poor performance of the plant was identified including:

- Poor maintenance of the effluent tank (lots of sludge).
- A low outlet on the separating tank allowing sludge to enter the main oil separator (coalescing filter separator).
- A manually operated skimmer in the separating tank that was potentially not activated in a timely manner (resulting in oil entering the main separator instead of being skimmed off).

- A faulty three cell settling pond rendering it largely ineffective.
- Poorly maintained band skimmer (oil adhered to the band was not being removed because the oil 'scraper' was badly positioned). Also, there was a missing deflector.
- Oil was largely emulsified by the time it reached the band skimmer rendering the band skimmer largely ineffective.

Following identification of this issues a number of corrective actions have been completed or are ongoing in 2021 as follows:

- Pipes containing oil (rather than oil in water) have been redirected away from the OWS to an oil storage tank for reuse as fuel for the dryers.
- Oil storage boxes for spills in the power station have been provided as an interim solution for generator oil leaks. As a longer-term solution, the generator manufacturer is trying to resolve the root cause of the leaks.
- At the locomotive workshop, the pump was repaired but has been found to have insufficient capacity to pump oil to the mobile tank. Consequently, this oil continues to be sent to the OWS.
- The pipe located inside a surface water gutter has been fixed using PVC piping although a more permanent fix is required.

Further corrective action is planned, including:

- Replacement of the afore mentioned inadequate pump in the locomotive workshop, thus enabling oil to go to a mobile tank rather than OWS (scheduled for Q4, 2021).
- Repair of floater in the separator tank to enable automatic operation of pump (scheduled for Q4, 2021).
- Cleaning of the separator tank to remove high volumes of accumulated sludge (scheduled for Q4, 2021).
- Repair of the band skimmer (scheduled for Q4, 2021).
- Consultant to evaluate process engineering (early 2022) and upgrade pf the system (late 2022).

Phase 2 - appoint an external consultancy

An external consultant has been identified and contact negotiations are underway.

Phase 3, design and implementation of technical improvements

Phase 3, design and implementation of technical improvements, will be initiated following completion of phase 2, and is scheduled for completion by end of 2022.

The corrective actions described above have significantly reduced the volume of oil being sent to the OWS leading to a reduction in oil concentrations in the treated effluent. Figure 7-5 below shows concentrations have decreased from a peak in March exceeding 800mg/l to less than 100mg/l in September 2021.

Whereas concentration of oil in water have decreased is significant as a result of the interventions made, they remain well above the discharge limit. The IESC therefore repeats it earlier recommendation that further urgent intervention is required to reduce oil concentrations in treated effluent, rather than wait for a permanent fix following the proposed work to be undertaken by the external consultant (phase 2 and 3). For example, oil water separators are available on a skid mounted/containerised form and could be hired on a weekly basis until the permanent engineered solution is operational. The IESC further recommends that CBG reports

progress with the actions scheduled for Q4 2021 and measured oil concentrations²⁷ in the effluent discharge to Lenders and the IESC on a monthly basis.

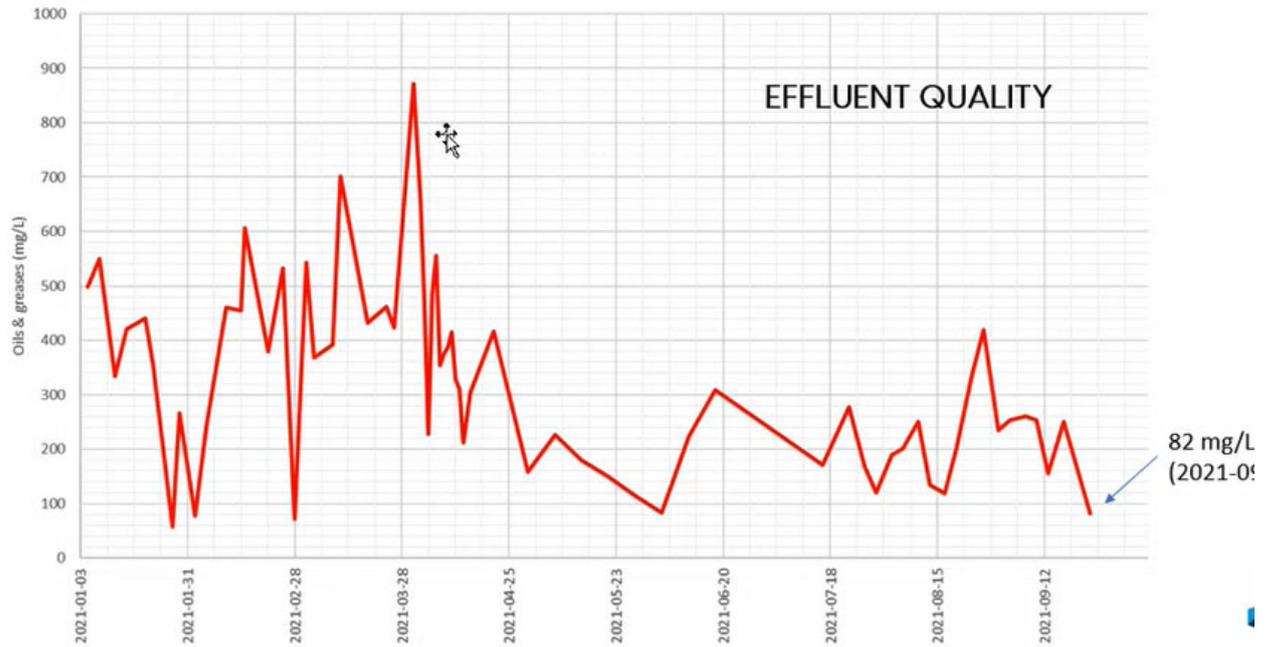


Figure 7-5. Oil concentrations in effluent treated by the OWS, 2021

7.4.3 Cogon Water Treatment Plant (Sangarédi)

Analysis of treated drinking water from the Cogon water treatment facility have revealed high concentrations of aluminium (Al) that exceed drinking water standards. The IESC understands aluminium sulphate [Al₂(SO₄)₃] is used in as a coagulating agent during the water purification process and the elevated Al concentrations may be a result of overdosing during the purification process in combination with naturally high levels of aluminium from the local geology.

A number of short-term measures implemented by CBG have resulted in >50% reduction in Al concentrations, however further reduction is required. CBG is therefore looking at non Al based reagents to replace the current use of aluminium sulphate. The IESC/Lenders should be kept informed as CBG seeks to reduce aluminium concentrations from this WTP. Progress in this regard will also be followed up during subsequent IESC monitoring visits.

7.4.4 Wastewater treatment at Sangarédi (Dounsey)

The IESC has reported, in successive monitoring reports, that CBG is aware of the need to maintain and upgrade the Sangarédi (Dounsey) wastewater treatment plant (WWTP), but also noted progress with the implementation of key actions set out in the Action Plan has been slow, in part due to COVID-19 travel restrictions. In March 2021, the IESC reported progress and also key actions that were due in 2021 including the installation of the UV treatment plant, considered necessary to achieve standards for faecal coliforms in the treated effluent discharge. At the time of the previous VSV, foundations for the UV treatment plant are under construction with the UV plant still stored at CBG’s Kamsar facilities. The IESC has been informed that the UV plant was to be installed in Q2, 2021. In October 2021 a building to house the UV treatment system was built

²⁷ CBG is measuring oil concentrations in the effluent twice a week.

and the UV plant was installed with commissioning of the plant scheduled for later in October 2021. The commissioning of the UV plant and removal of sludge have been an outstanding priority issues for a number of years. It is therefore pleasing to see progress made in this respect over the last 6 months. Moving forward the IESC will report on the anticipated improvement in treated effluent quality, particular in regard to faecal coliform concentrations.

Progress has also been made following the identification of a preferred contractor, to manage (safely remove and dispose of) the sludge with contract negotiations currently underway. This task is well behind the originally scheduled for Q2/Q3 2019, but it is nevertheless pleasing to see firm progress being made.

7.4.5 Recalibration of the Hydro/Groundwater balance model

As part of its water management strategy, CBG commissioned the development of a water balance model. One of the objectives of the model was to support CBG in its mine planning programme and, specifically, in predicting impacts of its mining activities on surface waters, groundwater and natural springs. CBG continues to be supported by the Canada-based consultancy, EEM, and work is ongoing to update the model using groundwater data collected since the model's initial development (subject to CBG's consultant selection process).

Calibration of the water balance model requires groundwater data from multiple locations²⁸ and has therefore been awaiting installation of new piezometers. Consequently, to date the water balance model has never been fully calibrated. CBG's application of the recalibrated model, including its use in developing LDPs (environmental constraint mapping) will be investigated during subsequent IESC monitoring visits.

In order to maximise the benefits of the water balance model, it is recommended that CBG staff become proficient in its use. Training of CBG staff should therefore be incorporated within the consultant's scope.

7.4.6 Mine effluents

CBG's water quality monitoring programme has confirmed high turbidity levels in a spring water used by the village of Fassaly Foutabhé. Investigations into the cause of the turbidity are ongoing, however it appears that there are some fractures in the rock, potentially due to CBG's blasting, which is now affecting the head waters at Fassaly Foutabhé (see Figure 7-6).

Samples of the spring water have been taken and allowed to settle. However, the sampled water remains turbid several days after its collection, suggesting this is not a simple issue of suspended particulates in the water. At the time of the VSV, samples had been sent for chemical analysis to determine the cause of the discolouration, but results were not available. Depending on the results of the analysis, corrective actions might be possible. In the interim, residents of Fassaly Foutabhé are able to draw water from existing wells. CBG is also planning to drill new wells for the village to ensure adequacy of water supply.

²⁸ In order to collect further groundwater data and inform the water balance model, CBG will install 20 new piezometers in early 2022. These will include replacement of damaged piezometers and new piezometers, for example, in proximity to the landfill facilities.



Figure 7-6. High turbidity levels/discolouration in headwaters of Fassaly Foutabhé

7.4.7 Bypass of the Kamsar WWTP

In the March 2021 Monitoring Report the IESC was informed by CBG that the bypass (more accurately described as an emergency overflow) has been used when the capacity of a sewage collection tank at the Kamsar WWTP was exceeded. Planned corrective actions at the time included: expansion of WWTP capacity; the installation of a meter to register overflow events; an investigation into ingress of rainwater to the sewage collection systems at the city (noting the occurrence of overflow events during the rainy season suggests that rainwater might be entering the sewage system); and the feasibility of building an emergency holding pond/tank.

During the October 2021 VSV, the IESC was informed that further investigations had taken place and CBG is able to confirm that that discharge of untreated water is only occurring during heavy rainfall events because the holding tank is overwhelmed by the volume of wastewater, inclusive of rainwater, received. Investigations have also revealed that the design capacity of the Kamsar WWTP is sufficient for the current Kamsar City population providing received volumes of sewage did not include rainwater. Further investigations were carried out to determine the source of the rainwater. These investigations revealed a significant amount of damage to an old sewage collection network resulting in the ingress of rainwater. Figure 7-8 is an example of an uncovered manhole at ground level that was allowing unhindered ingress of rainwater. Figure 7-9 is an example of a repaired manhole cover, raised and covered to prevent rainwater ingress.



Figure 7-8. Damaged manhole prone to rainwater ingress



Figure 7-9. Raised and repaired manhole cover to prevent rainwater ingress

Moving forward CBG intends to continue to inspect the wastewater collection system in Kamsar and repair elements prone to rainwater ingress. CBG also plans to install a flow meter to record actual discharge to sea from the overflow pipe. CBG will not build an emergency tank (as previously reported to be under evaluation), in part because of space constraints, and also because it is not likely to be necessary provided rainwater ingress can be prevented.

7.4.8 Water quality monitoring (new Hamdallaye village)

In previous site visit reports the IESC has reported on the quality of water sampled from newly-drilled drinking water wells in the relocated Hamdallaye village. In particular, one sample indicated the presence of faecal coliforms. Subsequent monitoring by has shown zero coliforms suggesting this was an anomalous result.

During the October 2021 VSV CBG informed the IESC that it has extended its sampling of drinking water to other community wells using the Ministry of Environment's laboratory for analysis of samples. Some of these wells have reported faecal coliforms and it is CBG's belief that the contamination is a result of surface water infiltration. CBG is investigating possible measure to resolve the issue, for example, relocation of wells away from sources of surface water infiltration.

7.5 Noise and Vibration

Action Plan

The Figure below provides a graphical summary of the status of implementation for the noise and vibration Action Plan. The total number of actions is 15; this is less than the number of actions previously reported as certain actions have been consolidated. It is therefore not possible to provide a quantitative progress update compared with the previous VSV. However, it is apparent that all the overdue actions are the responsibility of the HSECQ Department (or they are multi departmental but led by HSECQ). The three items that are delayed relate to: i) the implementation of a database (for all monitoring data including noise and vibration); ii) revision of the NVMP; and iii) update of the noise monitoring programme in accordance with findings of the MUOA ESIA and revised NVMP mentioned above.

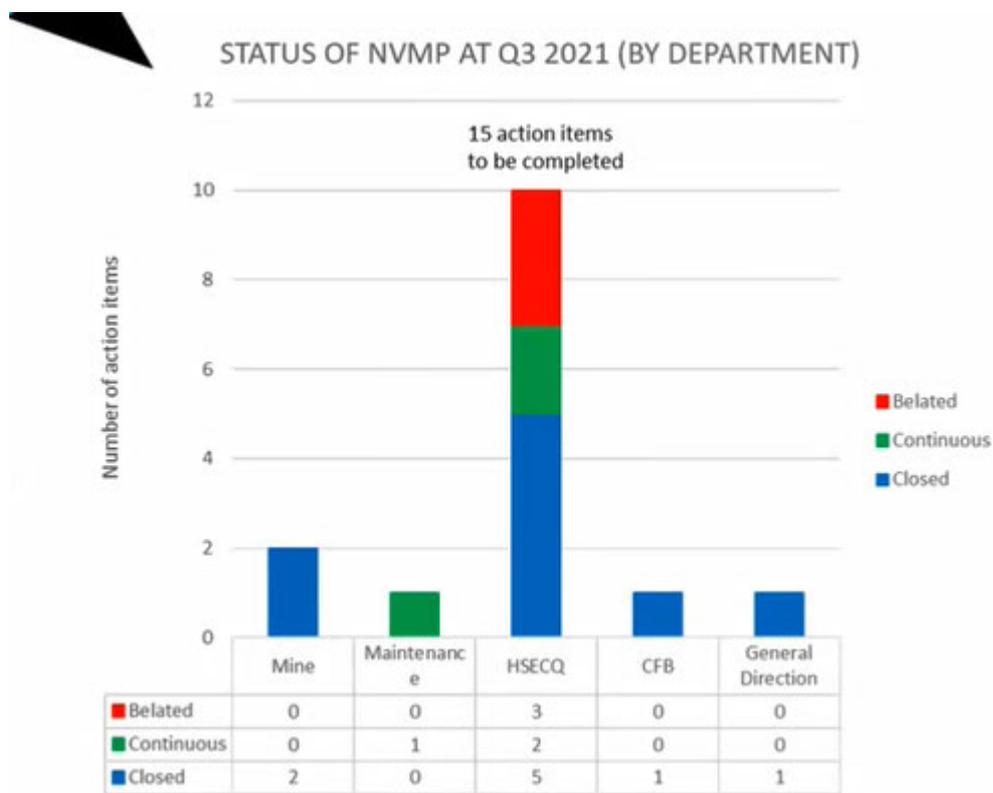


Figure 7-10. Status of implementation of N&V Action Plan by department.

Noise Monitoring_Railway

One of the key actions relates to the mapping of sensitive receptors affected by the MUOA rail project, specifically those receptors identified within 50m of the railway that, based on predictive modelling, will potentially be impacted by noise and vibration from increased train movements. This activity has been delayed but is planned to be finished in earlier 2022.

Noise and vibration monitoring data has been collected from pre-selected locations that are representative of rural, semi-rural and urban areas at a distance of 50m from the centre of the rail corridor, as specified in the EMoP. IESC recommends empirical data is collected from (or in close proximity of) the sensitive locations rather than pre-selected locations (if security of monitoring equipment can be assured). As a minimum, measurements should be done at distances that are the same distance from the railway as the sensitive receptors i.e. if receptor is

at 30m, then measurements should be taken at the 30m distance. Measurements at the receptor will also provide a site-specific background noise level. CBG should also continue its consideration of potential mitigation measures for these sensitive receptors (in the event they are required) as reported in the March 2021 IESC Monitoring Report and engage with residents at these locations to determine the level of disturbance currently caused.

In the previous monitoring report, it was highlighted that broken and malfunctioning equipment/software was hampering the collection of noise measurements. New equipment has since arrived (4 new noise meters) but essential ancillary parts (including battery packs needed for prolonged measurements) have not arrived thus delaying the use of the new noise meters. Ancillary parts are due before the end of 2021.

Noise measurements collected by CBG during 2021 using a single working noise meter were shared with the IESC. These readings appeared to be unusually high for both day time and night time, and certainly higher than Project standards, casting doubt over the accuracy of the readings. CBG should verify such noise readings with the new calibrated equipment²⁹ and also attribute noise measurements to the passage of individual trains. In particular, noise attributable to the passage of a train should be distinguished from background noise levels.

Noise monitoring_mine site blasting

The IESC has reported on CBG's plans to procure surface miners on several occasions in the past. In this report we are able to confirm CBG has procured two new surface miners, one of which has already arrived on site. The arrival of the surface miners is a positive development as these surface miners have been used successfully in the past by CBG in proximity of sensitive receptors because they generate less noise, vibration and dust relative to conventional blasting. Lower noise, vibration and dust impacts from surface miners will be confirmed by monitoring of these parameters in the near future. The IESC recommends noise levels are plotted against distance to give an indication of the noise propagation under representative conditions.

The IESC was also informed that CBG continues to monitor blasting events in villages located closest to blasting events in line with its new blasting procedure (see March 2021 IESC Monitoring Report). Noise and vibration data is shared with affected parties. Equipment to measure dust fall is currently on order which will enable CBG to share dust fall measurement once received.

CBG's LDPs have generally required a 500m buffer zone between blasting and sensitive receptors as specified in the Noise and Vibration Management Plan. CBG reported this has temporarily been extended to 1000m whilst the concerns of villagers are addressed. Assuming a return to 500m buffer zone in the future, monitoring of noise, vibration and dust at 500m distance (in addition to the affected village) would also be valuable.

Vibration monitoring_mine site blasting

The 2020 Annual Monitoring Report (AMR) refers to repeated exceedances of airblast overpressure limits. The EMTL explained that these exceedances were detected during monitoring of blasting events and have been discussed with the Mine Department. Following further investigation, CBG's blasting contractor has modified the blasting procedure to reduce vibration and a new approach to stemming³⁰ has been adopted which should reduce airblast overpressure as well as noise and dust. CBG intends to continue its monitoring of mining impacts, including any reduced noise and vibration resulting from new blasting techniques and

²⁹ CBG should run multiple noise meters in parallel to check whether results are the same or a meter requires calibration.

³⁰ Stemming refers to the packing of material in the charge hole. Poor stemming results in blow outs/loss of energy. And increased noise/dust levels.

the use of surface miners. The results of blast monitoring and effects of the actions put in place by CBG will be reviewed by the IESC during the next monitoring visit.

7.6 Waste management

CBG is continuing to implement its Waste Management Plan (WMP) and associated Action Plan. The two main projects within the plan include construction of the waste management facilities at Tora Bora (Kamsar) and Sangarédi. Overall progress in the implementation of the Action Plan is shown graphically in Figure 7-11, noting that the reporting of progress by number of actions is a crude measure of progress. The graph shows 66 items are behind schedule, with the majority of delayed actions related to the delayed construction of Tora Bora and Sangarédi facilities.

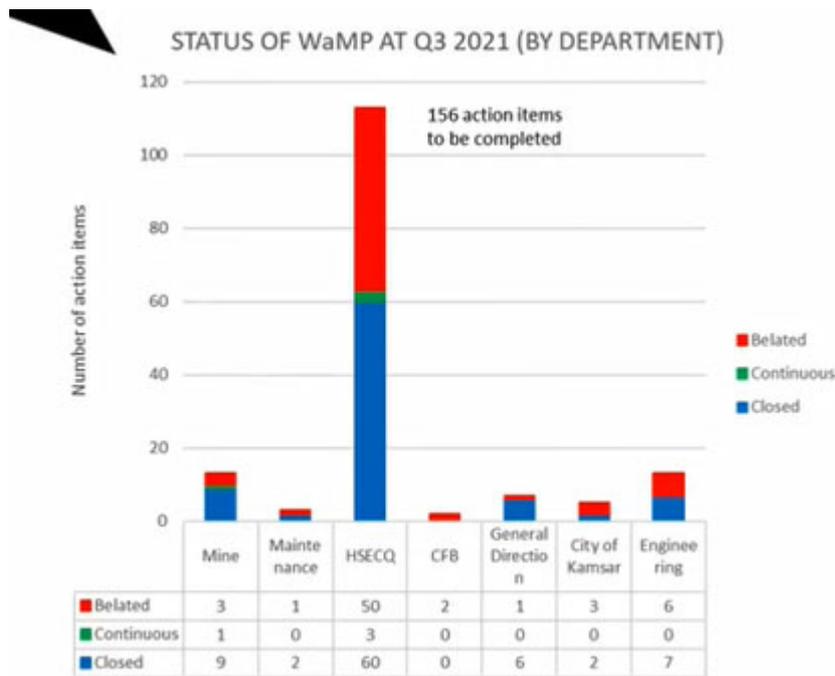


Figure 7-11. Overview of progress made against the 2019 Action Plan

In general, the IESC considers the timeframes specified in the original waste management Action Plan to be unrealistically aggressive, however progress nevertheless remains slow. Certain actions in the Action Plan are also no longer relevant as a result of design changes, for example, there is no longer a need to remediate the old Sangarédi landfill because the same site will be used for the new waste facility.

A status update for each facility is provided below.

7.6.1 Kamsar

Tora Bora

Preparatory works at the Tora Bora waste management facility (WMF) remain ongoing although limited progress has been made since the previous VSV 6 months ago. The design of waste cell is near complete with start of construction of the waste cells and leachate treatment system due to start in early 2022. Both incinerators remain fully operational at the time of the VSV. Bioremediation on a dedicated slab is ongoing and plans are in place to analyse the oil content of treated material following the 2021 wet season. However, the bioremediation process is not

expected to be complete and any decision for potential reuse of treated soil has not been taken at this stage.

Bendougou

As reported previously, CBG is considering a restart of its use of the Bendougou waste facility in Kamsar. An agreement to use Bendougou was reached with the relevant authorities earlier in 2021, however the agreement is no longer valid following the military coup and change in the authorities responsible for approving CBG's use of Bendougou. Discussions with the new authorities we need to be restarted and it is understood the use of Bendougou is not a priority issue for the new authorities; as such, these discussions are yet to restart. Ongoing consideration of Bendougou is therefore currently suspended, although there is no urgency to resolve the matter on CBG's part given the 5-year life span of Tora Bora facility once it becomes operational in 2022.

With regard to the agreement reached with the previous authorities, CBG informed that no community objections were raised. Recognising that CBG's decision to suspend the use of Bendougou facility several years ago was initially prompted by community protests related to passage of waste trucks, the IESC reiterates its earlier recommendation that CBG's Community Relations Department engages with villages situated along the Bendougou access road prior to any decision to restart disposal of waste at Bendougou.

Temporary waste storage (Kamsar)

The temporary waste site located close to the secondary crusher within CBG's Kamsar facilities remains operational pending completion of the Tora Bora site. Additional containers are now being used to securely store used tyres. This action will reduce incidence of tyre burning (reported previously).

7.6.2 Sangarédi

The Sangarédi waste management facility has been secured following the erection of a fence and an ongoing security guard presence thus reducing the incidence of scavenging at the site. Other preparatory works have also been ongoing, however design remains to be finalised and actions requiring completion of the site, such as procurement of incinerators (planned for 2021), remain outstanding.

CBG is planning to request tenders for the construction of the facility in early 2022 with actual construction of the site scheduled shortly thereafter.



Figure 7-12. New fence at the Sangarédi waste facility

7.7 Hazardous Materials

Limited progress with the closure of actions specified in the Hazardous Materials Management Plan (HMMP) has been made since March 2021 with overall progress remaining behind the original schedule. The Figure below provides a graphical representation of progress against the 2019 schedule, including status by department. Where an action is the responsibility of more than one department it has been assigned to HSECQ.

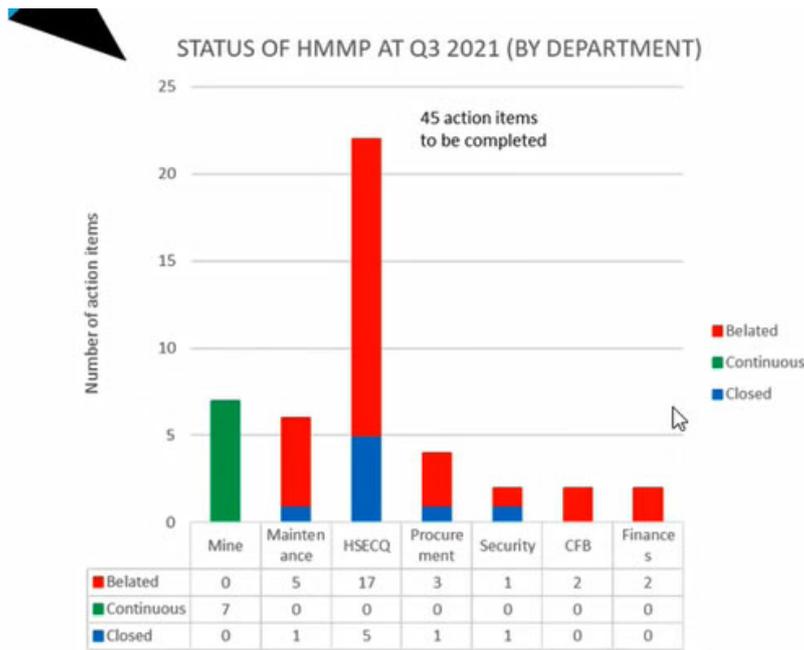


Figure 7-13. Status of HMMP action plan implementation by department

Despite the limited progress described above, a number of workstreams were reported during the VSV that will provide the foundations for implementation of the Action Plan. The intention is to have a Hazardous Materials Management System comprising the following elements:

- Hazardous Materials Manual. CBG is currently prioritising the preparation of a Hazardous Materials Manual. The Manual is intended to consolidate all relevant procedures from across the different departments thus acting as a single umbrella document, to be used across CBG departments, which will signpost specific procedures. It will also provide the framework for implementation of the Action Plan. The Manual is expected to be finalised at the end of 2021.
- Hazardous Materials Database. CBG is improving its hazardous materials database to ensure a single database is available to, and used by, all departments across CBG’s operations. The database will also be made available to contactors (see also findings in the March 2021 VSV).
- Training. A 2022 training programme is planned for employees that are required to handle hazardous materials. Training will be conducted in CBG’s training facilities.
- Permit system. The intention is to establish a permitting procedure for any new chemical products that are not already on the database. Using this approach, the procurement of new chemical products will need sign off from HSECQ Department.
- Hazardous Materials Audits. Currently the management of hazardous materials is captured within monthly HSE site inspections. Once the hazardous materials MS is in place, there will be a full audit of hazardous material management practices and reporting against the KPIs listed in the HMMP.

CBG also intends to review and revise the Hazardous Materials Management Plan, recognising that certain actions are redundant/have been superseded by design changes. Review of the HMMP is scheduled for early 2022 in line with the review/update of other Environmental Management Plans.

7.7.1 Lightning rods

The IESC was previously informed that radioactive lightning rods were being stored by CBG. During the October 2021 VSV the IESC was informed that no lightning rods were being stored, but instead they are fixed in-situ to buildings. The location of lightning rods has been mapped and they are considered to be in a safe condition whilst they remain untouched. However, a decommissioning plan is still required prior to any removal of the lightning rods/ decommissioning of buildings on which lightning rods exist.

7.8 Resource Use and Energy Efficiency

7.8.1 Progress in 2021

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.

The figure below provides an overview of progress to date against the 2018 RUEEMP by responsible department, noting that the maintenance department now has a significant role in reducing water and energy use.

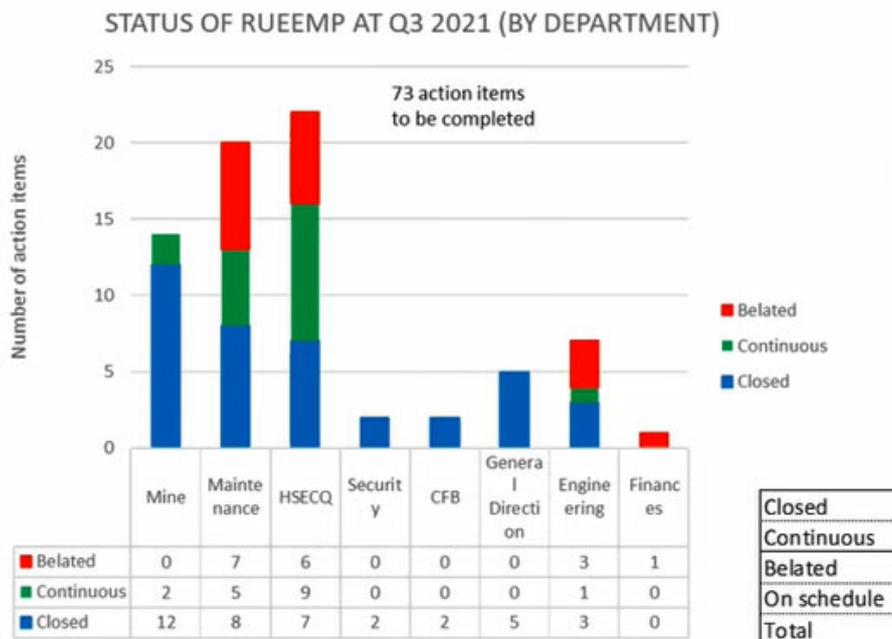


Figure 7-14. Status of RUEEMP Action Plan implementation by department

During the March 2021 VSV, the IESC recommended that opportunities for fuel efficiency/reductions in GHG emissions be made an integral part of the CBG procurement process, via the HSECQ 'Minimum Requirements', thereby requiring potential contractors to consider fuel efficiency/ GHG emissions reductions. CBG has reported that in June 2021 the HSE Minimum requirements were revised and consideration of resource efficiency/GHG emissions is captured. Linked to this, the IESC notes the reuse of a fuel-efficient dredger for the 2021 dredging campaign and the dredging company’s reference to fuel efficiencies in its dredge campaign report (see Section 5.7).

Another initiative under consideration by the Water (and Energy) Management Committee, highlighted in the previous VSV report, was the reuse of treated sewage water for dust

suppression (this is also one of the water efficiency measures included in the RUEEMP Action Plan). CBG still intends to reuse treated sewage water, however this can only commence following the commissioning of the UV treatment system at the Sangarédi wastewater treatment plant (see Section 7.4.1).

7.8.2 Priority actions for 2022

The following priority projects have been identified by CBG for 2022.

Revised Standard Operating Procedure (SOP) for GHG emissions monitoring and reporting.

CBG is refining the collection of data used in the calculation of GHG emissions which is based largely on the procurement of fuel by CBG. Similarly, assumptions used in the calculation of GHG emissions are under review, for example, the current conservative assumption in the GHG calculation methodology is that all land cleared by CBG is established rainforest, whereas in reality forested areas are generally avoided by CBG during land clearance. Revised methods of data capture/revised assumptions, calculations and reporting will be captured in a new SOP, to be developed by the end 2021. The new SOP will be developed with assistance from Alcoa and then applied to 2022 data, and where possible, also applied retrospectively to previous year(s) in order to provide comparable year-on-year results based on the same methodology. This will also help with the interpretation of emissions produced during the generation of electricity in which there was an unexplained significant increase in GHG emissions between 2019 and 2020 as reported in the 2020 AMR.

The IESC recommends that GHG emission are presented in a manner that recognises the increasing productions rates. For example, total emissions for the dryers could be expressed in tonnes of CO₂/unit of bauxite produced, thereby recognising an improvement in emissions per unit of bauxite produced even if total emission are increasing due to the increasing annual throughput of bauxite. Similar principles could be applied to the generation of electricity (noting old power generating units are earmarked for decommissioning in 2022). The IESC also notes that CBG provides electricity to communities and community demand is increasing. Similarly, CBG locomotives are used to transport COBAD and GAC bauxite. IESC therefore recommends that GHG emissions reporting data is broken down such that fuel use/GHG emission can be attributed to the different operators/community users. This breakdown can be detailed in the revised SOP.

CBG also informed the IESC that all fuel is procured by CBG, even if used by contractors, thus assisting with fuel-based emission calculations. However, some visiting vessels, for example dredgers, will use their own fuel when working in the port. Such emission must also be captured in addition to procured of fuel.

Finally, CBG is considering verification of the revised SOP by an independent certification body. Such action would be welcomed by the IESC.

Mapping of energy efficiency opportunities

Currently >50% of CBG's GHG emissions are a result of electricity generated at its power plants, and it is therefore power generation that offers the greatest potential for efficiency savings. CBG envisages the support of an external consultant in 2022 to identify energy efficiency opportunities, although no firm plans are in place at the time of the VSV. This action would be consistent with the IESC's earlier recommendations and is again welcomed.

Feasibility of alternative energy sources

The scope of work for the afore mentioned energy consultant will include consideration of alternative energy sources.

Mapping of opportunities for water use optimisation.

The Maintenance Department has then been tasked to record water (and electricity) usage in a database. Once better recording of water and energy use is in place, CBG will be able to map opportunities for energy/water efficiencies. Flow meters will also assist in the earlier detection of illegal offtakes.

Table 7-1: Summary of Findings, PS3

ID	Aspect	Issue Description	IESC Recommendation	Significance
October 2021_018	Environmental Monitoring Programme	CBG has been unable to implement its Environmental Monitoring Programme in full for a number of reasons, including most notably a lack of an external laboratory for complex analyses and limited in house equipment/analytical capabilities. At the time of reporting, contracts with external laboratories were either signed or signature was imminent.	Further effort is required to ensure full implementation of the EMoP and monitoring components of the environmental management plans, including: <ul style="list-style-type: none"> - Finalisation of outstanding contracts with external laboratories; - Procurement of a data management system; - Undertake a resourcing 'Needs Analysis' to determine current and future resource and training needs; and - Disclosure of monitoring results to affected communities in an appropriate and meaningful format. 	Moderate
October 2021_019	Air Quality – finalisation of AQMP	CBG was unable to complete wet season stack emission testing in 2021. Consequently, it is unable to meet the timeframes specified in the ESAP for finalisation of the AQMP.	CBG to agree an extended timeframe for the finalisation of the AQMP with lenders. The agreement might include conditions and/or interim deliverables, noting that interim stack emission limits for the bauxite dryers could be derived using the 2021 dry season emissions data, Dryer 2-4 operating parameters and ambient air quality results due to be available in early 2022 following the relaunch of ambient air quality monitoring. The future wet season sampling should also include emissions sources that could not be sampled in 2021, including Dryer 1 and power generating units at the Sangarédi, Batafon, Filima and Kamsar power plants.	High
October 2021_020	Air quality – dust suppression	CBG has trailed chemical dust suppressants, however the outcome of the trails is unclear.	CBG to confirm the outcome of the trials/its use of chemical dust suppressants on haul roads. Where applicable, details of any chemical dust suppressants being used should be made available to the Lenders via the agreed Management of Change Procedure.	Low
October 2021_021	Air quality – commissioning	Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators	CBG should explain why the power generators have not been decommissioned to date.	Low

ID	Aspect	Issue Description	IESC Recommendation	Significance
	of old power generating units	located in the original Kamsar central powerhouse by 2020. The IESC understands the old generators are no longer being used, however, they have not been decommissioned.		
October 2021_022	Water quality - Oil/water separator	Despite a number of successful interventions, oil concentrations in treated effluent from the oil water separator located at the Kamsar tank farm continue to consistently exceed the applicable IFC standard.	<p>A rapid intervention plan to achieve compliance in the shortest timeframes possible should be presented to Policy Lenders and the IESC. This should include consideration readily available containerised/skid mounted oil treatment equipment that can be hired on a short-term lease until a permanent engineered solution is in place.</p> <p>In addition, CBG shall:</p> <ul style="list-style-type: none"> • provide its monthly oil in water monitoring results for the treated effluent to lenders in order to demonstrate short term actions are effective • report progress on the interventions scheduled for Q4, 2021 <p>Any changes to the timeframes specified in the ESAP relating to the OWS must be agreed with Lenders.</p>	High
October 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
October 2021_023	Water Quality - Bypass of the Kamsar WWTP	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>CBG should expand its survey of the sewage drainage network to identify locations prone to rainwater ingress and repair elements prone to rainwater ingress.</p> <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

ID	Aspect	Issue Description	IESC Recommendation	Significance
October 2021_024	N&V impacts	<p>Review of noise and vibration management has identified the following issues:</p> <ol style="list-style-type: none"> Noise monitoring has been hampered by broken and malfunctioning equipment/software. Monitoring at specific sensitive locations along the railway has not occurred. There has been repeated exceedances of airblast overpressure limits in 2020. 	<p>Confirmation of the efficacy of measures put in place is required as follows:</p> <ol style="list-style-type: none"> Expedite receipt of ancillary equipment and initiate use of the new noise meters at the earliest opportunity. Further monitoring is required at specific sensitive locations along the railway. Noise and vibration measurements should be taken at a set back distance from the railway line that is equivalent to that of the sensitive receptors. CBG should engage with potential affected residents at these locations to determine the level of disturbance currently caused. CBG should confirm through monitoring data that measures to meet airblast overpressure limits have been successful 	Moderate
October 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 to those that occurred in the past, is therefore unknown.</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
October 2021_026	Hazardous materials management	<p>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.</p>	<p>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.</p>	Minor

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ID	Aspect	Issue Description	IESC Recommendation	Significance
October 2021_027	Energy efficiency/GHG emissions	CBG is refining its Standard Operating Procedure for GHG emission monitoring and reporting.	IESC recommends that GHG emissions reporting data is broken down such that fuel use/GHG emission can be normalised (tonnes CO ₂ /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

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

8.1 Introduction

CBG has developed a Community Health and Safety Management Plan (CHSMP) and the status of implementation of this Plan was investigated during the VSV. Also, opportunities were taken to examine other topics (including some 'issues', raised previously in IESC monitoring reports), to assess their status now and into the near future.

In addition to CHSMP implementation, other topics considered are:

- Blasting Protocol;
- Communicable disease prevention;
- Health infrastructure;
- Security; and
- Rail and community health and safety

8.2 Blasting Protocol

Blasting at the mine site has resulted in several community grievances since March 2019. CBG's response to blast related community concerns have been reported in previous IESC monitoring reports and include establishment of a Blasting Protocol intended to reduce risk to communities.

In its monitoring report arising from the July 2020 site visit, the IESC described work underway to amend the Blasting Protocol³¹. At that time, the Protocol had reached the final draft stage and was undergoing internal review. During this period, several consultation meetings were held with communities in the mine concession area to discuss various aspects of blasting including new additional mitigation measures. Finally, the Protocol was approved in August 2021 and issued as Procedure III_HSEC_57 (Rev01) '*Procédure Environnementale et Sociale pour le Minage*'.

The protocol gives important roles and key tasks to the following HSE&S personnel:

- Environment Advisor;
 - Determines with the Blasting Supervisor in consultation with the Biodiversity Advisor, the safe distance between the blast and critical areas (such as villages, rivers, habitats);
 - Is present on location during a blast and monitors ground vibrations and peak sound pressure at the time of the blast in sensitive areas; and
 - Checks with the Community Relations Sector Coordinator and communities after the blast to ensure that no damage has been reported in a village;
- Biodiversity Advisor:
 - Monitors blasting operations near forests and other key habitats; and
 - Ensures compliance with buffer zones and Land Disturbance Permit requirements;
- Community Relations Coordinator:
 - Informs and sensitizes communities 72 hours before and then again 24 hours before a blast by distributing the blasting schedule;

³¹ The Blasting Protocol establishes actions/responsibilities to manage blasting impacts and to reduce community health and safety risks.

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- Is present on location before, during, and after the blast and is assisted by at least two community representatives (key role is to reassure the community that the blasting process is being followed);
- Assesses the status of community infrastructure before and after the blast;
- Assesses the deposit of dust before and after the blast;
- Ensure that the blasting activity report is validated after the blast; and
- Receives and assists in managing any community grievances related to blasting impacts.

Figure 8-1 shows the locations where blast events have been monitoring since late 2019. As shown in the map the frequency of **monitored** blast event has increased significantly from 2019 (2 monitored blasts 2019 following commencement of monitoring; 64 in 2020; and 104 monitored blast events in 2021 year-to-date). The blasts are concentrated in specific mining plateaux /areas (designated LDP areas in the map legend) and thus, affecting a relatively small number of villages who are impacted by several blasts in a relatively short period of time.

New additional mitigation measures were introduced toward the end of February 2021 to reduce blast impacts including:

- Reducing charges by increasing the tamping height of blast holes, reducing the number of holes in a blast range, and readjusting blast pattern according to location;
- Reducing blasting frequency: from an average of 5 blasts per week per area to 2 blasts maximum per week per area; and
- Before February 2021, blasts generally occurred up to 13:00 hours. Now, to the extent feasible and depending on weather observations, blasts occur before 11:00 when meteorological conditions are more favourable reducing the dispersion of dust.

In addition, CBG has purchased two surface miners with the intention of avoiding blasting in locations near to communities. One of these surface miners is being assembled (at the time of the VSV) in Kamsar and is expected to begin operations in the period covered by Q4 2021 to Q1 2022. The second miner is expected to arrive in Q1 2022 and to be operational soon afterwards.

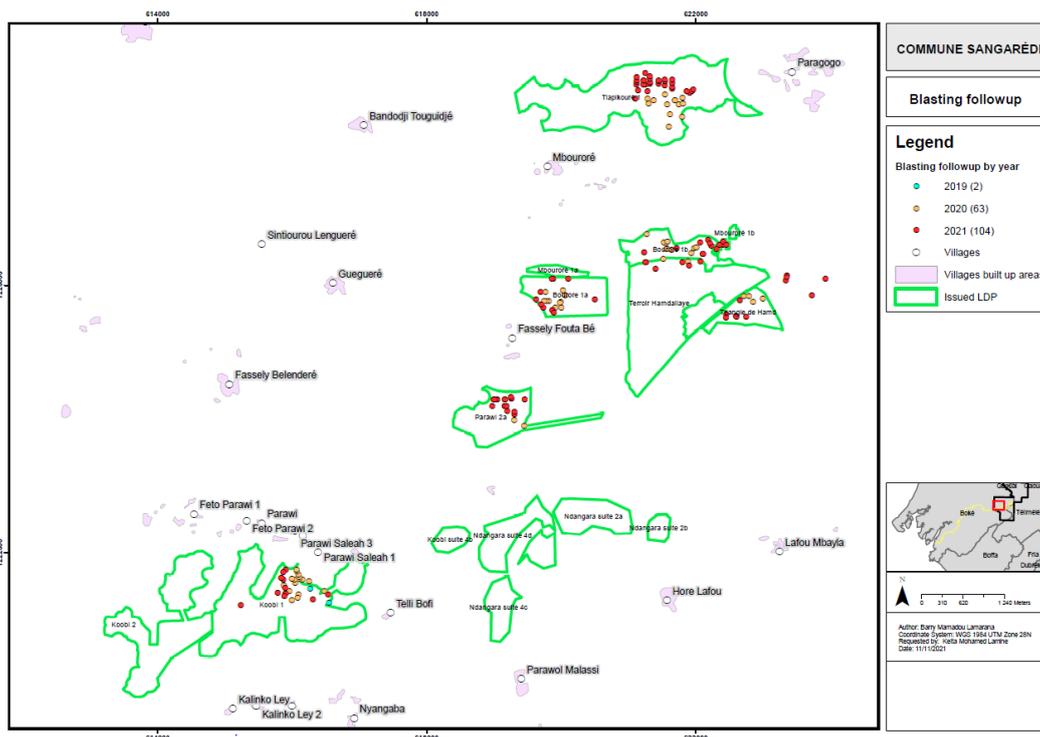


Figure 8-1: Map showing blasting locations, 2019 – 2021 year-to-date

Post VSV Note: The IESC was informed in late October 2021, an agreement was reached, on the issue of blasting, between CBG and the communities participating in the CAO mediation process.

8.3 Communicable disease prevention

8.3.1 Malaria

As described in the July 2020 monitoring report, CBG decided to join forces with the Chamber of Mines and with GiZ³² and participate in a joint anti-malaria programme. This programme was not implemented in 2020 due to COVID 19 travel restrictions. At the time of the previous site visit in March 2021, the programme had not started although actions were planned.

During the October 2021 VSV, the IESC was informed by CBG that GiZ had left the programme and work had not started. However, CBG is determined that the programme will be implemented and, to this end, is planning for a launch by the end of 2021. In August 2021, two coordination meetings were held with the Chamber of Mines of Guinea (CMG) and the National Malaria Control Program (NMCP) to restart the programme and CBG is commissioning an NGO to be responsible for implementing the programme (NGO was always going to be responsible for implementation). CBG will finance the programme with non-financial support from the other partners.

CBG has decided to extend the scope of the programme to include Daramagnaki in addition to Kamsar and Sangarédi. This decision resulted from CBG's analysis of health centre data showing high prevalence malaria rates in Daramagnaki and, also, the number of people who come from this area to receive treatment in Sangarédi. The distribution of nets remains part of the programme – provided by both CBG and NMCP. CBG will survey communities to obtain community concerns/baseline data to be used for monitoring/evaluation purposes.

Regarding the internal and regular CBG action of distributing nets to employees; this will be done by CBG in Q4 2021. Nets will be distributed to community members under the CBG/CMG/NMCP programme by the (to be) appointed NGO.

8.3.2 HIV/AIDS

With respect to HIV/AIDS activities, there were no activities in 2021 as there was no budget. It is not known if there will be a budget for 2022 as the health section is no longer under HSECQ and therefore not under the control of HSECQ. As both occupational and community health are responsibilities of the HSECQ department, it is unfortunate that these two important health functions are not under HSECQ control. It is recommended that the decision to remove the health function is reconsidered with a view to relocating, at minimum, the core occupational and community H&S functions currently within the health section back to HSECQ.

8.4 Health infrastructure

In 2021, CBG provided 10 boreholes (wells) in accordance with the action, under the CHSMP, "...to identify health and safety community investment priorities...". These are separate from the 10 boreholes provided under the MUOA Project, also, in 2021. Along with provision of the boreholes, the contractors provide:

- Analysis of water samples, for example, faecal coliforms;
- Training sessions for community members in operation and maintenance of the boreholes;
- Required tools; and
- Direction/assistance in establishing Water Management Committees.

³² GiZ = Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (German Agency for International Co-operation)

8.5 Security

The annual training, with respect to the Voluntary Principles on Security and Human Rights, of CBG security supervisors and state security actors attached to CBG was undertaken for 2021. Other security-related training events occurred.

CBG continues to maintain a register of security incidents that involve members of the public/communities. The register for 2021 year-to-date is presented in Table 8-1 and records 13 incidents. Apart from one incident involving a fatality arising from a train-related incident, all incidents are classed as Level 1 (the rail fatality is classed as Level 3). The IESC notes that several incidents are very similar to grievances; for example, the incidents of 01 February 2021 and of 16 March 2021 both involve the effects of dust, generated by blasting and truck movements respectively, on nearby communities. There may be a specific security element to these incidents which warrant their inclusion in the incident register, but this element is not clear from the brief incident descriptions provided. A check of the community grievance register shows that these two incidents are not recorded in the grievance register. It is recommended that CBG brings this observation to the attention of NTRospective to assist its work in redesigning the community Grievance Mechanism and in preparation of training materials for CBG staff involved in managing community-focused grievances

Table 8-1: Security Incident Register, 2021 year-to-date

Date	Zone		Severity actual	Severity Potential	Division/Entité	Dépt.	Description(Brève)	SIR
15/01/2021	Kamsar	Incident communautaire	Level 3	Level 1	CFB	D1103/E2	Accident de train avec fatalité à PK8 KAYENGUIA	OUI
01/02/2021	Sangaredi	Incident communautaire	Level 1	Level 1	Mine	D1004/04	Dépot de poussière sur le village de Fassaly-Foutabhè après le Dynamitage_ Plateaux Parawi2a et Mbouroré1a.docx	
02/02/2021	Sangaredi	Incident communautaire	Level 1	Level 1	Mine	D1004/04	Blocage des activités sur le plateau koobi suite à l'impact .docx	
16/03/2021	Kamsar	Plainte communautaire	Level 1	Level 1	Terrassement	D2503/53	Plainte soulèvement excessif de la poussière par les camions à Kawass Aéroport_.docx	
08/04/2021	Sangaredi	Incident communautaire	Level 1	Level 1	HSEC	D3001/39	Constats de l'état actuel du pont Barrage Cogon	
12/04/2021	Sangaredi	Incident communautaire	Level 1	Level 1	HSEC	D3001/39	Fours à briques à Cogon.docx	
12/04/2021	Sangaredi	Incident communautaire	Level 1	Level 1	Mine	D1004/04	Fours à briques à l'intérieur de la mine.docx	
10/05/2021	Sangaredi	Incident communautaire	Level 1	Level 1	Mine	D1004/04	Constats maisons et semence d'anacardes à la mine.docx	
09/06/2021	Sangaredi	Incident communautaire	Level 1	Level 2	Mine	D1004/05	Vent violent à hamdallaye et des dégats constatées sur les toitures de certains batiments	
21/08/2021	Kamsar	Incident communautaire	Level 1	Level 2	HSEC	D3001/39	Obstruction du passage par un occupant au marché sahara de KAMSAR	
21/08/2021	Kamsar	Incident communautaire	Level 2	Level 3	CFB	D1103/E2	Absence de barrière de protection au passage à niveau agglomération de KAMSAR	
31/08/2021	Kamsar	Incident communautaire	Level 2	Level 3	CFB	D1103/E2	Emeute dans l'agglomération de Kamsar avec des degats sur infrastructures ferroviares	
10/09/2021	Sangaredi	Incident communautaire	Level 1	Level 3	Mine	D1004/04	Présence des motards sur les rives minières	

CBG confirmed that the recent change of government in Q3 2021 had not resulted in material changes to security provisions including that provided by the state (military and gendarmerie). The only changes involve senior government personnel at the level of Sub-Prefect and above. The Protocol between the Ministry of Defence and CBG remains in place and unchanged (as of the time of the October VSV).

No incidents involving the abuse of authority/power against community members, by security providers, was recorded for 2021 at the time of the October 2021 VSV.

8.6 Rail and community health and safety

Three topics are presented in this section as follows:

- MUOA Transitional Measures Plan: Implementation
- Community incidents; and
- The Rail Safety Management Plan.

8.6.1 MUOA Transitional Measures Plan: Implementation

The MUOA Transitional Measures Plan (TMP) contains a range of 'soft' and 'hard' measures. Key soft measures in place include 30 flagmen (*hommes piquet*) at pedestrian crossings (they are in place continuously) in Kamsar and two people allocated to each set of points (*aiguilles*) along the entire railway (the second person is a 'back-up' in case the other person is unexpectedly unable to fulfil his/her duties). The latter measure, which is part of the temporary signalization, was due to finish at the end of June 2022, but it is now extended until end June 2023. This is aligned with the extension of temporary signalization which will now be kept indefinitely as an asset even though the permanent signalization will be operational by end June 2023.

The hard measures consist mainly of structures such as pedestrian or pedestrian/motorcycle bridges (to be referred hereafter, generically, as footbridges or passerelles) and level crossings. All the community/local government consultations related to the following topics are now completed:

- Sites for the passerelles; and
- Beginning of works to install the passerelles.

However, consultation continues, as necessary to discuss specific issues such as hiring of local people for construction/installation work.

Installation of the passerelles has been divided into 3 lots (lots 1 and 2 are in Kamsar and the Lot 3 includes Kolaboui and the GAC mine site) with two contractors. As indicated in the March 2021 VSV report, 13 passerelles are to be constructed: 9 in Kamsar (one of these to be constructed by GAC); 2 in Kolaboui and 2 in the vicinity of GAC operations near the railway). In line with community and local government wishes, especially in the urban areas, the passerelles will be installed and be ready for use before any fencing is 'closed'; that is, the fencing 'posts' can be erected at the same time as the passerelles are installed, but the fence mesh cannot be fixed to the posts until after the passerelles are open for public use). The fences (20 km overall and 15 km in Kamsar) will be erected by a different contractor/s. Given the importance that the communities/local governments have placed on the 'correct' passerelles/fences sequencing, and the fact that there are several contractors involved, it is recommended that CBG's engineering supervision focuses closely upon ensuring that each contractor is aware of the sequencing of the passerelles/fences and that regular supervision checks are made to ensure that the sequence is being applied.

During the October VSV, CBG informed the IESC that installation progress for all 12 footbridges at the end of August 2021 was 17%. Estimated date for completion of installation for all 12 CBG

passerelles is end March 2022 (in the March 2021 VSV report the expectation for completion is end February 2022); however, it is expected that most will be completed before the end March 2022 date; for example, Kamsar has been given priority so work on the Kamsar passerelles is likely to be completed before work on the other passerelles (possible completion date of end January 2022). A delay is occurring for the two passerelles at Tanéné as the extension of the span of the passerelles has meant that the design has been altered and a Change Order has been prepared, by the contractor, which is awaiting approval by the relevant MUOA committee. Should there be further delay for these passerelles it will not affect the other 10 passerelles.

Some of the time-bound TMP measures due for completion by end December 2021 are completed or are on track for completion by this date. Some changes to the remaining time-bound measures or noteworthy details on continuous (not time-bound) measures are presented here:

- At fenced level crossings, gates will be provided in the fence to allow pedestrians to cross. These gates will be manned by some of the flagmen (*hommes piquet*). In addition, there will be gates for ease of access to public buildings such as a mosque. These measures have been discussed and agreed with the community (in fact, the additional gates were requested by the community);
- Safety measures at level crossings (24 in total) are being strengthened with installation of mechanical, physical barriers with guards to man/operate them at those crossings which lacked them before or where they were damaged (8 level crossings in Kamsar and 5 in Kolaboui by the end of 2021 with the others located elsewhere); and
- Escorting of trains by motor vehicles will cease when all the fences are erected. This action will end almost 1 year before the original planned date.

The passerelles do not enable access by disabled people who are unable to walk/climb steps. CBG is aware of this issue, but at the moment disabled people will need to proceed to a level crossing to cross the railway.

8.6.2 Community incidents

During 2021 there have been two rail-related fatalities involving community members. Such fatalities occur most years. The IESC notes that one of the casualties suffered from mental health problems and that another casualty in previous years had mental health problems. During the October VSV, the IESC focused attention on this issue.

There is a house and compound about 1 km from the railway, in Kamsar, which is operated by a state-registered traditional healer who treats people with mental health problems. The treatment centre is residential with approximately 20 people staying there at any one time (about half may be patients and the others are family members/other relatives).

CBG has already met with the healer and alerted him to the risk posed by the railway. Given the risks of further fatalities if no action is taken, it is recommended that CBG consider and identify, in conjunction with the operator of the treatment centre (traditional healer), feasible measures (both 'soft' and 'hard') aimed at reducing the risk of rail-related fatalities involving his patients and then consolidate the measures into an action plan to be implemented as soon as possible after the plan is agreed.

CBG has reportedly visited the treatment centre to assess works necessary to erect a fence.

8.6.3 The Rail Safety Management Plan

The Rail Safety Management Plan is a component of the Road and Rail Safety Management Plan (RRSMP) and is being amended to take account of the MUOA Project. The integration of the TMP 'soft' and 'hard' measures, into the Rail Safety Management Plan will be achieved, primarily, via

amending the Action Plan associated with the Rail Safety Management Plan component. Work to update the MUOA-amended Plan/Action Plan was in progress at the time of the March 2021 VSV and integration was expected to be completed by the end of April 2021. A revised version was received 01 June 2021. A review by Policy Lenders and the IESC found that the integration was not adequate. A second revision of the Plan was being prepared by CBG at the time of the VSV.

Table 8-2: Summary of Findings, PS4

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
October 2021_028	Recording of security incidents and community grievances	The IESC notes that several incidents, recorded in the security incident register are very similar to grievances; for example, two incidents relate to the effects of dust, generated by blasting and truck movements respectively, on nearby communities.	All	This observation should be brought to the attention of NTRospective to assist its work in redesigning the community Grievance Mechanism and in preparation of training materials for CBG staff involved in managing community-focused grievances.	Minor
October 2021_029	Community health and safety: Installation of passarelles and fences	Communities/local governments wish the following installation sequence to be followed; the passarelles to be open for public use before the fences are 'closed'.	Construction	Engineering supervision to focus closely upon ensuring that each contractor is aware of the sequencing of the passarelles/fences and that regular supervision checks are made to ensure that the sequence is being applied.	Moderate
October 2021_030	Rail-related fatalities of community members	Recent increase in risk, in Kamsar, of rail-related fatalities of community members who have mental health problems.	All	Consider and identify, in conjunction with the operator of the treatment centre (traditional healer), feasible measures (both 'soft' and 'hard') aimed at reducing the risk of rail-related fatalities involving his patients and then consolidate the measures into an action plan to be implemented as soon as possible after the plan is agreed.	High

9. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

9.1 Hamdallaye and Fassaly Foutabhé RAP: Implementation Status

9.1.1 Hamdallaye and Fassaly Foutabhé

On 3 August 2021, a meeting was held between the IESC and representatives of the communities of both Hamdallaye and Fassaly Foutabhé (including the Hamdallaye Resettlement Committee), with CBG and CECI (LR implementing partner for the Hamdallaye and Fassaly Foutabhé RAP) in attendance. This meeting was planned as part of the March 2021 VSV, but was postponed until a later date.

At this meeting a wide range of issues, concerns and requests were raised by the community representatives many of which do not appear in the grievance and *doléance* registers. The IESC recommends that these issues, concerns and requests should be logged within the grievance/*doléance* management system so that they can be tracked and closed (see sections 9.1.2 to 9.1.4 below).

9.1.2 Hamdallaye

CBG reported that the few works that had previously been noted as outstanding, in the March VSV report, have now been completed, particularly in regards of drainage, plantations, the mosque and the youth centre. Specifically, the school is completed and was reported to be staffed. However, as the schooling year had not started at the time of the VSV, it was not possible to check whether it is fully operational. The health centre is completed and staffed.

In the meeting held on 3 August 2021 community representatives raised several issues and concerns, particularly relating to the operations of various items of social infrastructure, such as installation of a sound system and fence or wall at the mosque, improvements and equipment of the youth centre, some remaining drainage issues and, also, LR difficulties (see section 9.1.4 below).

The satisfaction survey, recommended in both the July 2020 and March 2021 IESC VSV reports, has not been implemented. The corrective actions are completed, and the Resettlement Committee has agreed, in principle, that the survey can be implemented. Consultations are occurring with the community and once concluded (and assuming no difficulties), the Resettlement Committee will give its approval soon for CBG to conduct the survey.

9.1.3 Fassaly Foutabhé

The situation with the school remains the same: no staff have been appointed by the relevant State authority. CBG reported again having been in contact with the "*Inspection académique*" (local education directorate) in Sangarédi and Boké to ensure that staff can be appointed. This was raised as a concern by representatives in the 03 August meeting. It is recommended that CBG continues to liaise with "*Inspection académique*" to obtain allocation of teachers to the school. The footbridge and the vehicular bridge are completed and CBG was commended in this meeting for provision of this infrastructure. The prayer room is also operational, but the Fassaly Foutabhé representatives expressed the desire that it should be fenced to avoid animal intrusion.

More generally, the Fassaly Foutabhé representatives also expressed the concern that the village could be relocated entirely as a result of the increase in CBG mining activities around it, which, in their view, might make the community unviable in its current location in the mid- to long-term. The IESC considers this issue, which has been raised before by the community, and has also been raised before by the IESC, to be a valid concern that must be addressed by CBG. It was

already recommended that a long-term cumulative assessment of land availability, potential mining-related environmental nuisances and related community health and safety risks should be prepared and consultations with the community, on the findings, take place. This recommendation has become more urgent since CBG has not taken action to date.

9.1.4 Livelihood Restoration at Hamdallaye and Fassaly Foutabhé

The post-COVID contingency plan that was prepared by CBG following the quasi-interruption of LR activities, that resulted from COVID-19 restrictions, has been in implementation for about one year. All activities had already resumed at the time of the previous VSV in March 2021. A good tracking system of implementation achievements against objectives, with a breakdown of each key activity into sub-tasks, is now in place, which is a positive step.

There has been reasonable progress on most activities by implementation partner, CECI, following the post-COVID contingency plan, with only a few still experiencing significant delays or not being fully started (e. g. grasscutter and goat breeding). The 3 August 2021 meeting with communities showed that these delays were generating frustration, and during this meeting CECI did not explain, adequately, the reasons for the delays. The delays were attributed, mainly, to procurement issues (such as obtaining young animals for breeding activities).

In respect of the 56 hectares of land meant for Hamdallaye livelihood restoration, it was reported by CBG that their rehabilitation was complete from a physical perspective (this has also been confirmed, after the VSV, in communications from CBG to the IESC). However, the process leading up to the provision of interim evidence of allocation this land to Hamdallaye PAPs (that is, the subdivision of the 56 hectares into household plots and its formal allocation with delivery of documentary evidence, with specified rights to the plots, to named PAPs, had not started. *(Post-VSV Note: on 21 October 2021, CBG requested that the deadline for delivery of this ESAP item (#24iii) should be postponed to 31 December 2021, instead of 31 October 2021.)* The IESC considers, based on experience of similar processes of land allocation in Guinea, that this exercise may be more complex than it seems, and that it has potential to generate grievances and become protracted (people unhappy with soil condition in the land plot they were allocated, or unhappy with location of their plot). Also, the process of obtaining formal confirmation from state authorities of land allocation to a given household or individual can be long and resource intensive. *(Post-VSV Note: CBG has provided, to the IESC and lenders, an action plan leading up to this interim evidence of allocation of the plots and allowed a period from 12 November to 24 December 2021 for consultations and issue of the interim documents with all required signatures. Progress toward the completion date of 31 December 2021 is tracked at each bi-weekly E&S call.)*

In the March 2021 VSV report, the IESC recommended two measures to improve the effectiveness of CECI's work with respect to horticultural/market gardening activities (*marâchage*) on rehabilitated land, as follows:

- Keep strengthening CECI's agronomic expertise; and
- Ensure, before inception of the dry season gardening period, that gardening group members are properly prepared to the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know how to do basic maintenance of drippers.

During the October 2021 VSV, the IESC noted no discernible progress to implement these measures; therefore, they remain as recommendations.

Some re-sensitisation work has been done on LR refusals (those PAPs that are reluctant to enrol in LR activities). This is positive, but the IESC's previous recommendation was also to document the refusals (through a specific refusal form, whereby PAPs confirm that they do not wish to

participate in the proposed activities), particularly in the context of the future completion audit. CBG cannot be held accountable for the livelihoods of affected people that have refused all proposed LR activities. It is recommended that refusals to enrol in LR activities are documented and kept 'on file'.

9.1.5 Recommendations Pertaining to Hamdallaye and Fassaly Fouthabé

The IESC recommends the following:

- Fassaly Fouthabé:
 - Continue to liaise with the "Inspection académique" to ensure allocation of teachers to the school; and
 - Prepare a long-term cumulative assessment of the future impact of mining activities on Fassaly Fouthabé and consult with community on the findings; and
- Hamdallaye and Fassaly Fouthabé:
 - Issues/concerns/requests raised by participants in the meeting held on 3 August 2021 to be logged within the grievance/doléance management system so that they can be tracked and closed; and
- Livelihood restoration:
 - Keep strengthening CECI's agronomic expertise;
 - Make sure before inception of the dry season gardening period that gardening group members are properly prepared to the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know how to do basic maintenance of drippers; and
 - Document refusals to enrol in LR activities and keep them 'on file'.

9.2 Completed LRPs

The "MUOA" LRP was approved by Lenders on 21 September 2020. However, procurement of an implementation partner is only expected to be completed in Q4, 2021; thus, no LR activities have been initiated. The previous IESC recommendation (March 2021 VSV report) that CBG must expedite appointment of an implementing partner is reiterated here. In case the implementation of the LRP does not start in a timely manner, transition measures might have to be delivered for MUOA PAPs.

9.3 LRPs in preparation

9.3.1 Kankalaré Resettlement and Livelihood Restoration Plan³³

In the March 2021 monitoring report, the IESC reported on the reasonably good progress that had been observed regarding community compensation measures, specifically, construction of a footbridge at Telibofi, construction of schools at Parawi and Niangaba, construction of a health centre in Parawi, and iron removal devices for the wells of these villages. However, as of October 2021, there had been no progress on LR implementation beyond the preparation of the LR component of the Plan.

The status of activities planned under the Kankalaré RLRP was found, in October 2021, to be the following:

- The Telibofi footbridge over the railway has been completed and CBG reported to the IESC that the community was very satisfied with the bridge;

³³ This Plan was known previously as the Kankalaré RAP.

- The nearby fence meant to improve villagers' safety has been designed and materials/works have been procured. It is understood that CBG is planning to complete them by 31st December 2021 (*Post-VSV Note: On 27 October 2021, CBG provided photos of the installation of sections of the fence*);
- The remaining infrastructure, including wells and associated iron removal devices, and the schools at Niangaba and Parawi, as well as the health post in Parawi, are now complete, a very positive achievement as these had been lagging behind for a long time due to procurement issues. These facilities have been formally transferred to the relevant authorities; and
- No staff have been posted at either of the schools or at the health post in Parawi, despite CBG's reported efforts to engage with the relevant authorities to obtain the required staff. It appears that these facilities are a secondary priority in the local school and health development programmes and that the authorities are unlikely to be able to post staff in the short-term.

Implementation of LR activities has not started apart from some preliminary engagement carried out by CBG without the implementation partner, which is yet to be procured and appointed. The procurement process has been initiated by the CR team submitting a scope of work, for the implementation partner, to their procurement colleagues. No precise date has been given for commencement of LR activities, although it is understood that they might start before end 2021.

Due to the delay in starting up LR activities, it had been agreed that transitional livelihood support measures would be implemented. After consultation with communities, this was delivered in the form of food support packages. Procurement was expedited and transitional packages were delivered in the July – September 2021 period.

9.3.2 Forthcoming LRPs

Below, a brief status description is provided for the three LRPs under preparation.

- Thiapikouré LRP
 - Scope of work for implementation partner submitted;
 - Procurement process started but not completed; and
 - LR activities not started.
- Kagnéka and Parawi Extension:
 - LRP submitted in September 2021; and
 - Implementation: Scope of work prepared for implementation partner, procurement and LR activities not started.
- "Contingency Blocks":
 - LRP submitted in September 2021; and
 - Implementation: Scope of work prepared for implementation partner, procurement and LR activities not started.

The IESC understands that CBG is procuring LRP implementation on a plateau/LRP basis. This means that different implementation partners may be implementing the same LR activity at the same time in neighbouring communities (or even in the same communities with different PAPs). As mentioned by the IESC previously, this is sub-optimal as it is likely to lead to considerable overlaps and potential inefficiencies or inconsistencies. A more cost-effective implementation model for these concurrent LRPs is recommended, consisting of one strong implementation coordination organization (consultancy or NGO), and thematic partners for specific activities (e. g. grasscutter breeding or gardening) across all LRPs.

9.3.3 Conclusions and Recommendations on LRPs

Planning (preparation of LRPs) has progressed. However, implementation of LR activities is delayed and/or protracted for the following reasons:

- Lack of planning and supervision capacity within CBG – resources have not been upgraded and the team remains undersized considering the numerous LRPs to be prepared and implemented;
- Lengthy procurement processes, with periods of up to 3-4 months between the time a scope of work is submitted by the resettlement teams and the conclusion of the contracting process; and
- Weakness of local implementation partners to implement a whole LR plan rather than just one of its components, with the result that even for the Hamdallaye and Fassaly Foutabhé LR activities, some are not started yet.

The IESC has expressed, previously, several recommendations to improve this situation and reiterates the recommendations presented in the March 2021 VSV report, as follows:

- Consider having a strong implementation partner to coordinate all LR activities within one or several LRPs, and
- Tender LR implementation by LR activity rather than by plateau and procure one implementation partner for each broad activity (e. g. agriculture, IGAs, livestock, business development, etc.) and for all plateaux.

9.4 Cumulative Impacts

The recommendation, presented in the IESC's March 2021 VSV report, to use GIS capability (which is now available) to assess key cumulative impacts on some communities (such as Fassaly Foutabhé, Hamdallaye, Parawi, and Paragogo) has not been acted upon. The concerns expressed in the 03 August 2021 meeting, by the Fassaly Foutabhé representatives, with regards of the long-term viability of their community in its current location, confirms that assessment of cumulative impacts for 'at risk' communities is now a priority. Thus, the March 2021 recommendation is reiterated in this October 2021 VSV report.

9.5 Resettlement Grievance Management

CBG reported that six resettlement and compensation related grievances had been processed in the grievance management system in 2021 (as of early October 2021). The IESC considers that this low number is unlikely to be a realistic number of grievances given the large number of PAPs (> 600) that were involved in asset inventories as part of LRP preparation. The IESC's experience of similar asset inventories in Guinea is that, typically, they result in a much large number of grievances (land ownership or usage claims, tree ownership, boundaries between plots, etc.). The very low number of grievances received suggests that the grievance management system does not operate as effectively as it should with all grievances and claims being duly logged, investigated, responded to, and closed. It is highly probable, based upon the IESC's experience, that many grievances are not recorded in the grievance register, for example, inventory consultants appear not to log grievances during their field activities).

CBG has an obligation under both PS1 and PS5 to log all grievances. Grievance that are not entered into the system and are not managed as a result can potentially 'return', but with escalated concern/disgruntlement on the part of the complainants. A fully-functional grievance mechanism is also particularly important, for CBG, within the context of the mediation process underway under the auspices of the CAO.

The IESC recommends that CBG reviews the grievance mechanism, including the option of separating resettlement- and compensation-related grievances from other community grievances, and to identify issues in the grievance logging process (specifically reviewing the role of inventory consultants, who appear not to log grievances during their field activities, as well as the role of CBG/contractor field staff).

9.6 Monitoring

In its March 2021 VSV report, the IESC recommended that CBG should '*Simplify the M&E framework for the LRPs under preparation*'. During the October 2021 VSV, the resettlement team presented a preliminary framework for monitoring. The IESC observed that this framework is not consistent with the "Monitoring" chapters in the draft CRPF and the LRPs, and, also, that it mostly focuses on progress indicators and not outcomes. Although the development of the framework is a commendable attempt by the team to progress this issue, it is recommended that the proposed framework is revised as follows:

- Use the information/guidance that was presented by the IESC during the VSV; the baseline sections of the LRPs; and the monitoring principles presented in the draft CRPF and LRPs (taking into account the generic Policy Lender/IESC comments [18 October 2021], on the Kankalaré RLRAP, with respect to the monitoring/indicator sections of the CRPF and all the draft LRPs) to identify key indicators;
- Distinguish progress indicators (input-output – those that are in the preliminary framework - from outcome (or impact) indicators that will essentially reflect changes in the status of livelihoods and quality of life;
- Develop not only indicators but also methods and frequencies to collect the related information (rapid satisfaction surveys and more in-depth livelihood surveys, based on credible sample design and methodologies);
- Ensure that the list of indicators is manageable from a workload perspective and that methodologies for gathering the related information are workable and practical (it is better to have a relatively short list of indicators that the team and/or consultants will actually be able to track, than a long, aspirational list, which eventually would prove impractical);
- Based upon the above actions, devise a coherent internal monitoring system; and
- Create a dedicated monitoring function within the resettlement team and resource it accordingly, and actually start monitoring, which remains embryonic at the time of reporting.

9.7 Resettlement Implementation Capacity

9.7.1 Findings

At the end of September 2021, the Resettlement team's staff complement remains at five (the same number as at the time of the March 2021 VSV). As mentioned earlier, CBG is finalizing Version 2 of the Time-bound Recruitment Plan 2021-2023 for both the CR and Resettlement teams. The current version of this Plan (dated 20 September 2021) includes the following actions/timing for resettlement personnel resourcing:

- Q3 2022 – appointment of a Livelihoods Restoration Adviser; and
- Appointment of a Database specialist. This specialist is a shared resource with the CR team (the specialist will be a member of the CR team).

Thus, by end of Q3 2022, the resettlement team's staff complement will be six full-time staff members with a dedicated 'half-time' share of the CR team's Database specialist.

In addition, the resettlement team is supported, currently, by the consultancy companies; SIGMA and SAMESC, under two separate framework contracts. These contracts terminate in 2023. Other

contractors are used for specific 'one-off' services. Also, the resettlement team has access to support from Acorn International (see section 5.1.2 above). To assist the resettlement team prepare and then implement several LRPs, at the same time, CBG is progressing actions to obtain more external support, as follows (correct at the time of the October VSV):

- Addition of a third framework contract to assist preparation of resettlement plans; and
- Several new contracts with service providers to assist with implementation of resettlement plans recently completed/ under preparation. Currently, it is intended that one of these service providers will be designated as the 'Principal Contractor' and have a co-ordinating role in terms of managing the actions of the other service providers across several resettlement plans. The recommendation above, on this topic (see section 9.3.2), remains as the appointment of a service provider as the 'Principal Contractor' has not occurred yet.

CBG has met, already, with potential contractors to better understand their capabilities and access to international support. By the end of Q4 2021, it is intended that signed contracts will be in place. The IESC supports an increase in external service providers, but notes that this will require additional internal capability to manage the enhanced 'operations' aspect of resettlement work.

On several previous occasions, the IESC has emphasized the inadequacy of personnel resources dedicated to compensation, resettlement and LR activities and made several recommendations to remedy the situation. Some progress had been noted (e. g. use of framework contracts); however, the findings from the October VSV confirm that this progress has been slow and not consistently maintained.

Despite the addition of a Livelihood Restoration adviser by end 2022 and the expansion of external support by the end of 2021, the resettlement team remains under-resourced, as indicated below:

- No team member has the sole dedicated role of managing 'operations' across all 'on the ground' activities;
- Monitoring activities are not managed by a dedicated team member; and
- The team is all-male, which is an impediment to the necessary engagement with females.

The IESC still observes that the procurement of externally-provided technical support and goods/services does not meet the need of the resettlement team; for example, the period of three to four months before some contracts are finalized. Such a time period makes delivery activities 'on the ground' problematic in a situation where many actions are hampered by seasonal factors such as the rain in the wet season. Thus, procurement of required goods and services is not meeting resettlement needs cost-effectively and delivery of assistance to affected individuals, households and communities is delayed. The IESC recommends that HSECQ and Procurement and Logistics departments establish a small working group to adapt the current procurement procedure by creating i) a means of accelerating resettlement-related requirements and ii) designing a 'fast track' route for high priority requests.

Post-VSV Note: The IESC was informed by CBG, after the VSV, that the Resettlement Specialist had left CBG. Also, CBG has appointed an interim Resettlement Specialist to be in place until a permanent appointment is made.

9.7.2 Recommendations

Key recommendations (taking into account the non-renewal of the contract of the Resettlement Specialist) are similar to those presented previously in the IESC's March 2021 VSV report and are repeated here, as follows:

- Create operations and monitoring/evaluation posts within the resettlement team and make appointments as a priority; and
- Seek to appoint females to the team; and
- HSECQ and Procurement and Logistics departments to establish a small working group to adapt the current procurement procedure by creating i) a means of accelerating resettlement-related requirements and ii) designing a 'fast track' route for high priority requests.

9.8 List of Recommendations

Hamdallaye and Fassaly Fouthabé RAP:

- Fassaly Fouthabé:
 - Continue to liaise with "*Inspection académique*" to ensure allocation of teachers to the school;
 - Prepare a long-term cumulative assessment of the of the future impact of mining activities on Fassaly Fouthabé and consult with the community on the findings;
- Livelihood restoration:
 - Keep strengthening CECI's agronomic expertise;
 - Ensure, before inception of the dry season gardening period, that gardening group members are properly prepared to the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know how to do basic maintenance of drippers;
 - Document refusals by PAPs to enrol in LR activities to avoid issues at the completion audit stage;

LRPs:

- Expedite appointment of an implementing partner for the MUOA LRP;
- Consider appointing a strong implementation partner to coordinate all LR activities within one or several LRPs; and
- Tender LR implementation by LR activity rather than by plateau and procure one competent implementation partner for each broad activity (e. g. agriculture, IGAs, livestock, business development, etc.) and for all plateaux;

Cumulative Impacts:

- Based on CBG's GIS capacity existing survey develop a methodology to assess the extent of cumulative impacts on mining and mining-related activities on the most affected communities, to track impacts and assist in making decisions regarding their overall viability in the medium- to long-term;

Grievance Management:

- Review the grievance mechanism, including the option of separating resettlement- and compensation-related grievances from other community grievances, and to identify issues in the grievance logging process (specifically reviewing the role of asset inventory consultants, who appear not to log grievances during their field activities, as well as the role of CBG/contractor field staff);

Monitoring:

- Use the information/guidance that was presented by the IESC during the VSV; the baseline sections of the LRPs; and the monitoring principles presented in the draft CRPF and LRPs (taking into account the generic Policy Lender/IESC comments [18 October 2021], on the Kankalaré RLRAP, with respect to the monitoring/indicator sections of the CRPF and all the draft LRPs) to identify key indicators;
- Distinguish progress indicators (input-output – those that are in the preliminary framework- from outcome (or impact) indicators that will essentially reflect livelihoods and quality of life;
- Develop not only indicators but also methods and frequencies to collect the related information (rapid satisfaction surveys and more in-depth livelihood surveys, based on credible sample design and methodologies);
- Ensure that the list of indicators is manageable from a workload perspective and that methodologies for gathering the related information are workable and practical (it is better to have a relatively short list of indicators that the team and/or consultants will actually be able to track, than a long, aspirational list, which eventually would prove impractical);
- Based upon the above actions, devise a coherent internal monitoring system;
- Create a dedicated monitoring function within the resettlement team and resource it accordingly (tentatively one full-time staff);

Resettlement Implementation Capacity:

- Create operations and monitoring/evaluation posts within the resettlement team and make appointments as a priority;
- Seek to appoint females to the team; and
- HSECQ and Procurement and Logistics departments to establish a small working group to adapt the current procurement procedure by creating i) a means of prioritizing resettlement-related requirements and ii) designing a 'fast track' route for high priority request.

Table 9-1: Summary of Findings, PS5

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
October 2021_031	Fassaly Foutabhé school	The Fassaly Foutabhé school is still not yet staffed	Operations	Continue to liaise with “ <i>Inspection académique</i> ” (local education directorate) to ensure allocation of teachers to the school	Moderate
October 2021_032	Cumulative land impacts	Fassaly Foutabhé community has expressed concerns as to the long-term viability of the village in its current location	Operations	Prepare a long-term cumulative assessment of the future impact of mining activities on Fassaly Fouthabé and consult with the community on the findings and identify other ‘at risk’ communities and undertake similar cumulative impact assessments	High
October 2021_033	Hamdallaye and Fassaly Foutabhé grievances/ <i>doléances</i>	At the meeting of 3 August 2021, a wide range of issues, concerns and requests were raised by the community representatives many of which do not appear in the grievance and <i>doléance</i> registers	Operations	Issues/concerns/requests raised by participants should be logged within the grievance/ <i>doléance</i> management system so that they can be tracked and closed	Moderate
October 2021_034	Hamdallaye Livelihood restoration	Previous recommendations to improve CECI’s work with respect to horticultural/market gardening activities (<i>maraîchage</i>) on rehabilitated land have not been implemented adequately	Operations	CBG to: <ul style="list-style-type: none"> - Strengthen CECI’s agronomic expertise; and - Ensure, before inception of the dry season gardening period, that gardening group members are properly prepared to the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know how to do basic maintenance of drippers 	Moderate
October 2021_035	Hamdallaye livelihood restoration	No recording of refusals to participate in LR activities	Operations	Document refusals to enrol in LR activities and keep them ‘on file’	Minor
October 2021_036	Livelihood restoration, all sites and plateaux	Implementation of LR activities is delayed and/or protracted. Need for stronger coordination	Operations	Consider appointing a strong implementation partner to coordinate all LR activities within one or several LRPs and tender LR implementation by LR activity rather than by plateau and procure one competent implementation partner for each broad activity (e. g. agriculture, IGAs,	High

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				livestock, business development, etc.) and for all plateaux	
October 2021_037	Management of resettlement grievances	Only very few resettlement-related grievances appear to be logged and managed	Operations	Review the grievance management system, potentially separating resettlement- and compensation-related grievances from other community grievances, and to identify issues in the grievance logging process (specifically reviewing the role of inventory consultants, who appear not to log grievances during their field activities, as well as the role of CBG/contractor field staff)	High
October 2021_038	Monitoring	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	Operations	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
October 2021_039	Resettlement implementation capacity	The resettlement team remains understaffed despite the planned recruitment of a new staff member and the expansion of external support by the end of 2022. Also, the contract for the Resettlement Specialist was not renewed	Operations	Create operations and monitoring/evaluation posts within the resettlement team and make appointments as a priority Seek to appoint females to the team	High
October 2021_040	Resettlement implementation capacity	Procurement of required goods and services is not meeting resettlement needs cost-effectively and delivery of assistance to affected individuals, households and communities is delayed	Operations	HSECQ and Procurement and Logistics departments to establish a small working group to adapt the current procurement procedure by creating i) a means of accelerating resettlement-related requirements and ii) designing a 'fast track' route for high priority requests	High

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

10.1 Introduction

The biodiversity component of the VSV was completed through a series of meetings between the IESC biodiversity specialist and the CBG Biodiversity team. The attendees from the CBG Biodiversity team were:

- Biodiversity Manager³⁴;
- Botanical specialist;
- Faunal specialist;
- Rehabilitation specialist;
- Survey and inspection specialist: and
- A GIS and data specialist.

In addition, E&S specialists from both the IESC and Policy Lenders joined the meeting to discuss the 5-year Land Rehabilitation Plan. The order of topics, presented below, reflects the sequence of the VSV meetings.

10.2 Biodiversity Inspections

To monitor the compliance of CBG operations (including the MUOA Project and initial investigations in the North Cogon concession³⁵), and the management of biodiversity issues arising from the activities of SMB-W and COBAD (in the South Cogon concession), the CBG Biodiversity team continues to undertake regular biodiversity inspections and/or contributes to multi-disciplinary E&S inspections, as follows:

- CBG operations: typically, biodiversity team only inspections, sometimes including members of the CR team; and
- SMB-W (railway) and COBAD (road): Multi-disciplinary inspection teams including a biodiversity specialist.

The scope of the biodiversity inspections remains consistent for all visits and regardless of an inspection team's composition.

Overall, the IESC is satisfied that there continues to be a clear, well-organised programme for completion of inspections of CBG's operations and SMB-W/COBAD Road activities. There has also been good progress with SMB-W in implementing/closing-out required actions in response to the team's site-based observations (situations of concern which are potential or actual non-conformities), however, the progress with COBAD has not been as successful.

Three findings/locations were considered during the VSV, with details of the LDP, photos of the sites and the inspection reports discussed. The locations were as follows:

- Thiapikouré (CBG operations);
- Restored COBAD road (CBG rehabilitation) at Boulléré; and
- SMB-W.

At the Thiapikouré site, a non-conformity was identified by the inspection with a small amount of sedimentation entering a watercourse. During the meeting it was confirmed by CBG that the

³⁴ The Biodiversity Manager was not able to attend all meetings.

³⁵ A contractor has been appointed to carry out an assessment of biodiversity in the plateaux targeted for exploration and those that have been surveyed previously.

issue had now been addressed but without evidence being shown during the meeting. *Post visit note: CBG subsequently provided photographic evidence of sedimentation basins and the planting of vetiver grass.*

A similar issue was identified at a COBAD Road site inspected on 18 March 2021 (immediately after the March 2021 VSV) with sedimentation of a watercourse (Figure 10-1). At the time of the October VSV, the issue was yet to be addressed by COBAD and this highlights a difficulty for CBG in enforcing actions that need to be implemented by other mining companies even though they are operating on CBG's concession.



Figure 10-1: Sedimentation of Watercourse by COBAD

At the restored COBAD road at Boulléré, progress of the growth of the trees, planted as part of the restoration process, was shown to be very good as shown in Figure 10-2. The key issue to be resolved in the area is the potential restoration of a bridge. CBG considers that bridge restoration will increase the risk of increased access, into the 'Boulléré' KBA, for purposes of charcoal extraction. This issue will be addressed in more detail during the next VSV in Q1 2022.



Figure 10-2: Good tree growth along the restored COBAD Road at Boulléré

During the discussion of the SMB-W site, the IESC was informed that SMB-W intends to improve its biodiversity work in collaboration with CBG. During the VSV, an SMB-W construction area which appeared, during a previous VSV, to have been abandoned was shown to have been prepared for restoration as shown in Figure 10-3. SMB-W has also committed to the development of actions plans including: i) one to address residual non conformities; and ii) a second for the demobilisation of its temporary construction facilities (See Section 5.8).



Figure 10-3: Construction Area at SMB-W, prepared for restoration

10.3 Biodiversity Action Plan

The BAP was approved by the IESC and Policy Lenders in advance of the VSV (September 2021) and as such the VSV session was intended to discuss progress of specific actions within the BAP in more detail. CBG explained that it is in the process of appointing The Biodiversity Consultancy (TBC), on a framework agreement basis, so that TBC can help deliver the BAP actions. However, this process is delayed with TBC not appointed at the time of the VSV. The delay is reported to have been caused by a procurement issue. At the time of the March VSV, the timeline set out in Table 10-1 was proposed for key BAP actions:

Table 10-1: BAP Timeline of Actions (March 2021)

Actions clés du nouveau BAP

N°	Action	Responsibility	Road map
1	Develop the Biodiversity Monitoring and Evaluation Plan (BMEP).	Biodiversity Manager	Q4 2021
2	Define the baseline conditions against which losses / gains will be evaluated	Biodiversity Manager	Q1 2021
3	Estimate residual impacts on priority biodiversity	Biodiversity Manager	Q2 2022
4	Define>NNL / NG objectives for priority biodiversity (NG/>NNL TRACKING)	Biodiversity Manager	Q4 2021
5	Develop and implement the community forest landscape management program (FLCMP)	Biodiversity Manager Community Manager	Q4 2021
6	Implement and review the BMEP	Biodiversity Manager	Q3 2022

The BAP (approved in September 2021) had the timeline as set out in Table 10-2 which is broadly similar to that presented during the March VSV, but with shorter timescales for actions considered by the IESC to require faster progress toward completion.

Table 10-2: BAP Timeline of Actions (September 2021)

#	BAP section	Action	Targeted timeline
1	Section 9.1	Update the existing biodiversity monitoring programme by re-developing the current monitoring regime into a prioritised PS6-aligned BMEP based on suitable indicators and monitoring protocols	By Q3 of 2021
2	Section 9.2	Define biodiversity baseline conditions for priority biodiversity features as per the selected metrics/indicators, and populate the NNL/NG tracker	By Q3 of 2021
3	Section 9.3	Estimate residual impacts on priority biodiversity features as per the selected metrics/indicators, and populate the NNL/NG tracker	By Q4 of 2021
4	Section 9.4	Define NNL/NG targets for priority biodiversity, and populate the NNL/NG tracker	By Q4 of 2021
5	Section 9.5	Implement the BMEP	From Q4 2021
6	Section 9.6	Develop and implement the FLCMP in alignment with NNL/NG targets and methodologies defined in this BAP	From Q1 2022

During the October VSV, the timeline of actions was further updated as set out in Table 10-3 which shows that the timeline is now further delayed compared to the March and considerably longer than that set out in the approved BAP (September).

Table 10-3: BAP Timeline of Actions (October 2021)

Table 1 - BAP roadmap and actions

#	Action	Tentative timeline
1	Update the existing EMoP ¹ into a PS6-aligned BMEP ² based on suitable indicators and monitoring protocols	By Q2 of 2022
2	Define biodiversity baseline conditions for priority biodiversity features as per the selected metrics/indicators, and populate the NNL/NG tracker	By Q2 of 2022
3	Estimate residual impacts on priority biodiversity features as per the selected metrics/indicators, and populate the NNL/NG tracker	By Q2 of 2022
4	Define NNL/NG targets for priority biodiversity, and populate the NNL/NG tracker	By Q2 of 2022
5	Start implementation of the BMEP	From Q4 2022
6	Develop and implement the FLCMP in alignment with NNL/NG targets and methodologies defined in this BAP	From Q2 2023
7	Biodiversity and ecosystem services technical inputs to the CBG team and their partners/consultants	Continuous
9	Update BAP to reflect progress and updates	By end of framework contract

The continued delays to the BAP process are concerning. However, the IESC is aware that in the absence of the appointment of TBC, the biodiversity team continues to progress many of the “on the ground” actions required under the BAP. In particular, monitoring for the following species/groups was underway at the time of the VSV:

CBG BAUXITE MINE

- Chimpanzees;
- Hippopotamus;
- Red colobus;
- Reptiles;
- Amphibians;
- Freshwater species;
- Marine species; and
- Flora.

In the IESC's March VSV report, concern was expressed about the delay in implementing BAP actions with a recommendation requiring regular updates to be provided via established communication channels, such as the bi-weekly E&S calls with the IESC/Lenders. These updates have not occurred. It is recommended that CBG provides an update on 'BAP Action Implementation Status' in specified (by the IESC) E&S bi-weekly calls. In the interim, CBG is to prepare a memorandum on the current status of BAP Action Implementation with the first of the regular bi-weekly call updates to occur no later than 4 weeks after receipt of the memorandum by the IESC/Lenders.

Following the October VSV, CBG prepared the afore mentioned memorandum for the attention of the IESC and Policy Lenders in November 2021. The memorandum, entitled 'Onsite Offset Program Key Implementation Progress Update', provides an update on the status of the on-site biodiversity offset within the CBG South of Cogon concession, including the following highlights:

- Implementation of the Forest Landscape Community Management Programme (FLCMP), prepared in February 2020, is a key mechanism for addressing residual biodiversity impacts. A number of actions from the programme were ongoing at the time of the VSV including:
 - Capacity building of community associations;
 - Implementation of community tree nurseries;
 - Revision of the CBG Community Development Plan; and
 - Development of the integrated landscape management approach as detailed in ESAP item 28 (tender process ongoing).
- A comprehensive biodiversity monitoring programme including monitoring of flora, terrestrial mammals, reptiles and amphibians, freshwater aquatic ecology. CBG is supported by a blend of national and international biodiversity experts in its monitoring programmes.
- CBG also views collaboration with neighbouring mining companies to be key to the success of its on-site offset programme. Thus, in 2021, CBG has shared its BAP, monitoring programmes and biodiversity data with GAC and has fostered a collaborative approach i.e. developed with GAC a collaborative action plan. Collaboration with SMB-W takes place via inspections and the Bauxite Environment Network (REB) meetings (of which CBG is currently the chair), with the SMB-W General Manager expressing commitment to collaborate with CBG and REB. Efforts to collaborate with COBAD continue, however these efforts are hampered since COBAD no longer participates in REB meetings.

10.4 Five-Year Mine Rehabilitation Plan

A working final version of this Plan and was discussed during the October VSV. CBG informed the IESC that land rehabilitation progress in 2021 year-to-date had exceeded expectations by 35 ha (see Figure 10-4). This welcome performance was due to a combination of i) early rehabilitation of an area whose rehabilitation was planned for future years and ii) rehabilitation of an area not originally included in the Plan. Work continued to complete the physical rehabilitation of the 56 ha Hamdallaye site with addition of more topsoil. *Post VSV Note: a revised final version of the Plan was received on 18 November 2021 and this version is currently under review by the IESC and Policy Lenders.*

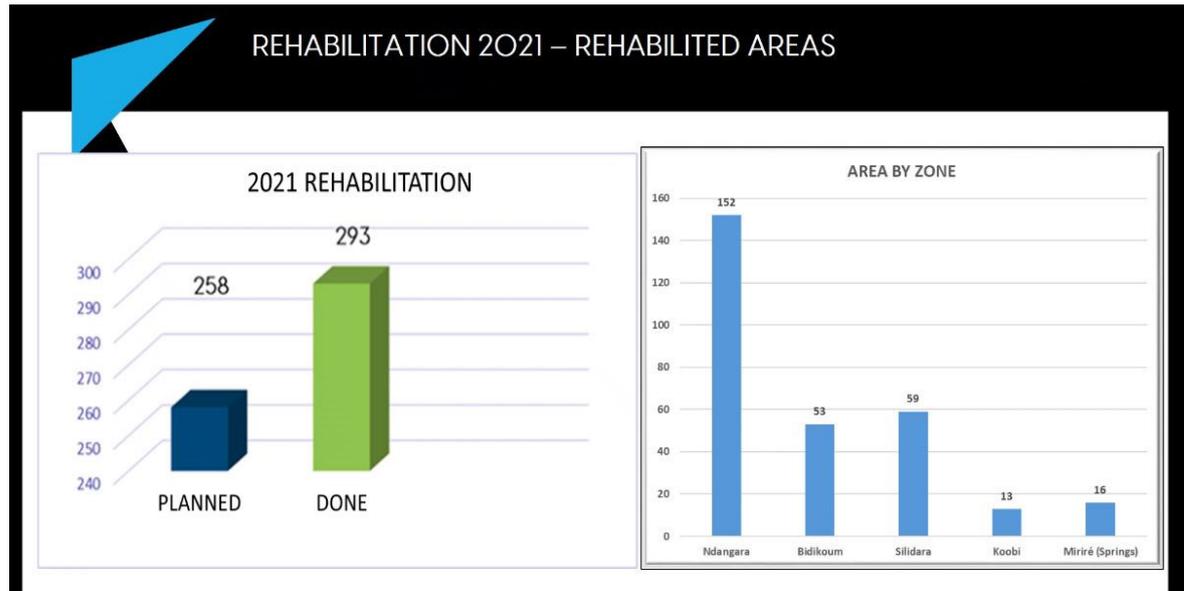


Figure 10-4 Rehabilitation Progress 2021

10.5 Offsets

An additional session on offsets was completed in the week following the VSV to discuss progress on both the onsite (Boulléré) offset area and the offsite (Moyen Bafing) offset area.

CBG has been working closely with local communities in the Boulléré area as part of the development of the landscape level plan. Through this process, CBG has identified the need to consult more closely with those communities and communicate the importance of the surveys being completed and the proposed conservation objectives proposed. CBG has found that local residents are largely receptive to conservation as living alongside chimpanzees and the other flora and fauna is embedded already in local culture and it is also recognised that nature conservation could provide jobs and opportunities. The IESC requested CBG to prepare a Memo presenting activities completed to date and future proposed actions. *Post – VSV Note: a memo entitled 'Onsite Offset Program Key Implementation Progress Update' was provided to the IESC and Lenders. See also Section 10.3.*

Regarding Moyen Bafing, CBG reported that the legal process of preparing an agreement with GAC over management of the offset is ongoing but, in the meantime, CBG continues to support the Wild Chimpanzee Foundation to undertake the necessary monitoring and management work on site. TBC is also contracted and supporting CBG. The lack of a legally-binding agreement with GAC remains a key issue to be resolved to enable this offset to progress.

Table 10-4: Summary of Findings, PS6

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
October 2021_041	BAP Implementation	In the IESC's March VSV, concern was expressed about the delay in implementing BAP actions with a recommendation requiring regular updates to be provided via established communication channels, such as the bi-weekly E&S calls. These updates have not occurred.	All	Regular updates to occur, but less frequently than the bi-weekly calls; instead CBG to provide an update on 'BAP Action Implementation Status' in specified (by the IESC) E&S bi-weekly calls. In the interim, CBG is to prepare a Memo on the current status of BAP Action Implementation (<i>post VSV note: memo received</i>) with the first of the regular bi-weekly call updates to occur no later than 4 weeks after receipt of the Memo by the IESC/Lenders. Note: the action lies with the IESC to include periodic biodiversity updates in bi-weekly call agendas.	Minor
October 2021_042	Biodiversity Inspections	Sedimentation of watercourses identified on a CBG site (non-conformity) and on a COBAD Road site	All	Provide evidence of the CBG's best efforts to persuade COBAD to address the sedimentation of a watercourse arising from the COBAD Road.	Minor

11. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

11.1 Introduction

CBG is implementing the Cultural Heritage Management Plan (CHMP) and the implementation of this Plan was investigated during the VSV.

11.2 Cultural Heritage Management Plan: implementation

In 2021, there were 14 actions being implemented with three due to be completed in this year. Two were completed at the time of the VSV, as follows:

- Share all cultural and archaeological heritage knowledge and data (including GIS) with COBAD, including any new data as it becomes available (with approval of communities); and
- Prepare an annual monitoring report for the year 2020 focusing on implementation of the CHMP, action plan, and KPIs.

The third action, purchase of Trimble Youma devices. is expected to be completed by end December 2021 (see section 5.1.2 *Equipment and Training*).

During the earlier March 2021 VSV, the IESC learnt that a clause presenting a requirement for managing cultural heritage was included into the draft HSECQ 'minimum requirements' to be provided to contractors (see Section 6.4). During the October VSV, CBG confirmed to the IESC that this clause now contains a requirement to implement the 'Chance Finds Procedure'.

CBG reported, during the October VSV, that several activities had been completed in 2021, actions of note are:

- Twenty-three (23) cultural heritage management consultation and awareness-raising meetings on were held in the Communes Rurales of Sangarédi (14 villages) and Daramagnaki (9 villages);
- Continual updating of the monitoring register of cultural heritage sites: 32 sites out of 542, or 6%, were updated for the mine area;
- Organizing/presenting 6 training sessions on cultural heritage management:
 - 5 training sessions for the staff concerned and 11 subcontractors of the mine; and
 - 1 training session for CFB/MUOA staff and for 4 MUOA contractors; and
- Amending the Cultural Heritage Data Collection Sheet (the names of community contacts have been added).

There are no IESC recommendations relating to the management of cultural heritage.

APPENDIX 1 VIRTUAL SITE VISIT ITINERARY

Day 1. Monday 4th October

Time slot (all times are for Kamsar)	HSE TEAMS Room 1	Social (excluding resettlement) TEAMS Room 2	Resettlement TEAMS Room 3	Biodiversity * TEAMS Room 4
13.30-15.00	<ul style="list-style-type: none"> • Opening meeting • Project status update including latest on mine plan and recent LDPs (South of Cogon), dryer 4, North Cogon. • Update for MUOA project • Overview of all contractors incl. contractor details, activities being performed, number of workers (presentation from CBG) • New audit SMI and contractors resource (Gap Analysis) • COVID protocols and situational update • CAO mediation process - overview 	See HSE column	See HSE column	See HSE column
15.30-17.00	<ul style="list-style-type: none"> • HSECQ Resourcing • Inspections overview COBAD Road, SMB, CBG) 	i) CR+ Resettlement Teams: staff resources; equipment and training (training progress) ii) IsoMetrix: Implementation and Performance	15:30 – 18:30: Overview (active resettlement/displacement areas, staffing, consultants, status framework contracts for RAP/LRP preparation, LR implementation partners, CRPF update, status update on key recommendations/action items from	See HSE column

			<p>last site visit, grievances related to resettlement, CAO mediation).</p> <p>Hamdallaye and Fassaly Foutabhé: RAP Implementation -Progress Overview (excluding Livelihood Restoration)</p> <p>CBG's views on points made by communities in the early August IESC meeting with them.</p>	
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Day 2. Tuesday 5th October

Time slot	HSE	Social (excluding resettlement)	Resettlement	Biodiversity
0900 – 10.30	<ul style="list-style-type: none"> HSE audit programme (internal and external) HSE performance (statistics) Permit status Community/worker fatalities in 2021. Corrective Action Tracker 	<p>Community Health and Safety Management Plan: Action Plan Implementation Update</p> <p>Rail incidents involving people with mental health issues</p>		
11.00 - 12.00	Emergency Response	Community Development Plan: Action Plan Implementation Update	<p>11:00 – 12:30: LRP preparation</p> <ul style="list-style-type: none"> Thiapikouré LRP: Status Update (including plans for transitional measures and preparation of the impact assessment) MUOA LRP: Implementation and integration of ‘gatehouse’ and ‘access road’ PAPs - Update 	<p>General Update on Progress – including staffing plans and resourcing of surveys required as part of BAP.</p> <p>Update on REB/BEN progress (unless it requires longer session of its own – CBG to confirm. Meeting will start earlier if necessary).</p>
Lunch				
13.30-15.00	Management of Change (MoC) (review of MoC register and relevant documentation to confirm compliance with MoC Procedure)	<p>Labour and Working Conditions:</p> <ul style="list-style-type: none"> new resource dedicated to contractors’ audits wrt LWC Dissemination of Key Documents (HR 	<p>13:30 – 17:00 Livelihood restoration implementation:</p> <ul style="list-style-type: none"> Hamdallaye Fassaly Fouthabé Kankalaré Thiapikouré 	<p>Biodiversity Inspections:</p> <ul style="list-style-type: none"> Examples of inspections completed Review of inspection register Non-conformities SMB + COBAD

		<p>Manual/Worker Grievance Mechanism</p> <ul style="list-style-type: none"> • Worker Grievance Mechanism (CBG and Contractors)/Code of Ethics: employment grievances and compliance claims • Demobilization plans (if any) 		
15.30-17.00	Dredging	<p>Community Mobility Study: Draft Report</p> <ul style="list-style-type: none"> • Discussion on way forward 		See HSE Column

Day 3. Wednesday 6th October

Time slot	HSE	Social (excluding resettlement)	Resettlement	Biodiversity
0900 – 10.30	Waste management	Cultural Heritage Management Plan: Action Plan Implementation Update		
11.00 - 12.30	Water management (including session on oil/water separator)	Road and Railway Safety Management Plan: Rail Safety Action Plan Implementation Update		BAP, BMR and BMEP: discussion focusing on: <ul style="list-style-type: none"> • Extent of BAP scope identifying project components currently included such as North Cogon
Lunch				
13.30-15.00	Air quality including ambient air and stack emissions monitoring	Blasting: <ul style="list-style-type: none"> • Roles/Responsibilities (departments/personnel) • Decision making • Implementation (Protocol) • Community liaison • Monitoring & evaluation 	LRPs in preparation <ul style="list-style-type: none"> • Contingency block • Plateau (Parawi/ Ndangara/Kagneka) LRPs) 	
15.30-17.00	EMoP – general status update	Local Content Plan: Action Plan Implementation Update	Monitoring and Evaluation: Current Practice/Future Intentions	

Day 4. Thursday 7th October

Time slot	HSE	Social (excluding resettlement)	Resettlement	Biodiversity
0900 – 10.30	Resource use and energy efficiency (Action Plan Implementation Update)	Influx Management Plan: Action Plan Implementation Update		-
11.00 - 12.30	Hazardous materials	See Biodiversity column		5-year Rehabilitation Plan and Landscape Level Plan (ESAP items 27 + 28). To include land restitution
Lunch				
13.30-15.00	Noise and Vibration including monitoring (excluding blasting protocol)	Stakeholder engagement and community grievances (including the grievance related to the Hamdallaye pastoralists)/ <i>doléances</i>	Preparation for close-out meeting	Biodiversity – AOB/Preparation for close out meeting
15.30-17.00	Preparation for close-out meeting	Preparation for close-out meeting	Preparation for close-out meeting	Preparation for close-out meeting

Day 5. Friday 8th October

Time slot	HSE	Social (excluding resettlement)	Resettlement	Biodiversity
13.30 – 15.30	Close-out meeting	Closing meeting (in HSE mtg room)	Closing meeting (in HSE mtg room)	Closing meeting (in HSE mtg room)

*Due to unavailability of key staff at the time of the VSV, additional biodiversity meetings took place following the main VSV as follows:

- An additional meeting took place with the biodiversity team, including the Biodiversity Manager, on the 13/10/2021 to discuss biodiversity offsets.

APPENDIX 2

KEY PROJECT DOCUMENTATION MADE AVAILABLE FOR REVIEW

Document Title	Organisation
Incidents Communautaire (community incidents involving security providers)	CBG
Various documents relating to operation of the Workers' Grievance Mechanism (Plainte en cours de traitement [sample copies of completed grievance forms]; Plaintes soldés; Tableau des plaintes 2021; Rapport statistique de la Gestion de plaintes)	CBG
210829_Procédure de minage_Version Finale_Rev01 (Blasting Protocol) + Annexes	CBG
Various examples of completed documentation used at different stated in blasting activities	CBG
Registre suivi trimestriel plaintes et doléances - T3 2021 (Community grievances and community requests registers (Q3 2021)	CBG
Action Plan for Stakeholder Engagement 2019-2021 EN_00 showing completion status against all actions	CBG
Scope of Work for preparation of the Stakeholder Engagement Plan 2022-2025	CBG
Annual Monitoring Reports (for 2020) for the following E&S Plans (Influx Management; Local Content; Cultural Heritage; Community health and Safety and Community Development)	CBG
Cahier de charges, Kamsar Fevreir 2021 (ref DA 1015974) - Specifications for the 2021 dredgng campaign	CBG
Maintenance dredging works of the entrance channel and berthing area at the port of Kamsar, republic of guinea 2021 campaign – Final Report, Dredging International Services August 2021	Dredging International Services
Permit to Work – Confined spaces	CBG
Establishment of a program for the observation and monitoring of marine and estuarine fauna and habitats around the port area and the CBG Kamsar (in French), 19/08/2021	CBG
Dredging permit 2021/01/PD, 6 April 2021	CBG
Noise Permit issued by the Ministry of the Environment, Water and Forests on 12/10/2021	Ministry of the Environment, Water and Forests
Corrective Action Tracker (live spreadsheet)	CBG
Serious Incident corrective actions (live spreadsheet)	CBG
On site offset program key implementation progress update, 9th November 2021	CBG
Evidences: CBG Inspection Findings on Thiapikhoure Site, 16/12/2021	CBG
Non comformity/corrective action registers (via multiple ppt. presentations)	CBG
REB Action Plan -implementation status (via ppt. presentation)	CBG

APPENDIX 3

STATUS OF ISSUES IDENTIFIED IN PRECEDING MONITORING VISITS

Appendix 3.1 - Status of issues raised in the March 2021 site visit report

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (current IESC Opinion in October 2021)
March 2021_ 001	SEP revision	Currently, the CR team is preparing a revised version of the SEP for the period 2022 to 2025.	PS1	CR team to consider carefully, the lessons learnt from implementing the current SEP and its likely future commitments, when revising the SEP and ensures that the revised SEP presents a realistic, pragmatic and flexible set of requirements that are implementable in the period 2022 to 2025.	Minor	Closed (The draft SEP 2022 – 2025 has been prepared and is under Lender/IESC review)
March 2021_ 002	Management of Change	The relative proportions of the three categories, combined with the relatively small number of changes since mid-2020, suggests not all change requests are being captured.	PS1	<p>CBG to repeat dissemination and awareness training of the MoC Procedure.</p> <p>An internal audit of the Procedure's implementation by different departments would inform the extent of its use and inform any corrective actions to improve use of the MoC Procedure, if required.</p> <p>Furthermore, the Quality team should consider better liaison with the Procurement Department on the IESC's understanding that many changes require purchase of goods and services, and thus the Procurement Department is able to alert the Quality team of any missed change requests.</p>	Moderate	Superseded (see October 2021_001)

March 2021_003	CR team recruitment	There are several expected future work commitments that will put pressure on the existing CR team resources, potentially leaving the CR team with insufficient resources to meet these commitments effectively.	PS1	CR Manager to evaluate not only the CR team's current and future workload, but also the geographic locations where it is likely be working, when identifying its future likely recruitment needs in the forthcoming revised Recruitment Plan.	Moderate	Closed (The draft Time-bound Recruitment Plan [up to 31 December 2023 (Version 2)] has been prepared and is under Lender/IESC review)
March 2021_004	CR team resources	The allocation of a 4x4 vehicle from CBG's fleet (with 'delivery' expected by end January 2021) to the CR team has not occurred	PS1	The 4x4 fleet vehicle to be allocated without any further delay or a replacement vehicle is hired if the maintenance and safety checks find that repairs to the fleet vehicle are required. If no fleet vehicle can be allocated by end April 2021, then it is recommended CBG purchase a vehicle of equivalent passenger capacity and performance	Minor	Closed (Vehicle allocated on 17 May 2021)
March 2021_005	NoCo Exploration	Community consultations occur after the E&S Rapid Appraisal stage. The draft Compensation and Resettlement Policy Framework shows that community consultations occur prior to impact mitigation measures being defined.	PS1	One round of community consultations to be implemented as part of the E&S Rapid Appraisal stage, at a time which CBG considers most appropriate in the local context.	Moderate	Open (Details of the studies to be undertaken for NoCo feasibility not yet available)
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 plateaux over a three-year period is not factor in drilling campaign decision-making for each LDP.	PS1	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.	High	Open (Details of the studies to be undertaken for NoCo feasibility not yet available)

March 2021_007	Revision of Environmental Management Plans	Certain Environmental Management Plans that were not affected by the MUOA project remain unchanged since they were approved in January 2019.	PS1	All plans, particularly those not subject to update to take account of the MUOA project, should be reviewed and updated in line with the 2-year review cycle, as described in Section 10 of the EMPs. Revisions should include both an update of the content of the plan to reflect current status, decisions and actions, and also revision of the timeframes included in the associated actions plans	Moderate	Open
March 2021_008	Social Management Plans	These 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 continuing relevance of all actions, especially, those actions that are continuous or on-going.	PS1	These Plans to are 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	Open
March 2021_009	Female participation in stakeholder meetings	CBG is attempting to ensure, via revised/new approaches, that female participation rates increase in CBG-led community stakeholder meetings. Currently, this initiative does not include contractors which will engage, also, with such stakeholders.	PS1	CBG to require its contractors to follow its lead in encouraging enhanced female participation rates; particularly contractors that are involved in preparing and/or implementing RAPs and LRPs.	Moderate	Closed (CBG reports that contractors have been alerted to this requirement)
March 2021_010	Female submission of grievances	Grievances appear to be submitted exclusively by males.	PS1	As part of its efforts to increase female participation in stakeholder engagement, it is recommended that	Minor	Open (CBG continues to 'test' options to increase female

				CBG considers ways in which women can be encouraged to submit grievances directly and not only via male relatives or male community members.		participation- see section 5.5.3 of this report)
March 2021_011	Communications Plan for 2021	CBG's Communications Plan for 2021 does not include recent important HR documents in its employee 'explanation' actions.	PS1	The actions presented under 'Internal - Operational Excellence', concerning HR documents, should be amended to show the current new key HR documents and not only older, though still current documents.	Moderate	Open (The Communications Plan for 2022 has not been approved internally. It is planned to review it during the next site visit in Q1 2022.
March 2021_012	Communications Plan for 2021	CBG's Communications Plan 2021 does not include a 'procedure' for managing external communications as required by PS1 (para. 34).	PS1	CBG to design a procedure for managing external communications and then inserts it into the Plan ready for implementation in 2022.	Minor	Open (The Communications Plan for 2022 has not been approved internally. It is planned to review it during the next site visit in Q1 2022.
March 2021_013	Community grievances	CBG sub-divides grievances into three categories: 'economic', 'safety' and 'environment'. These are very broad categories.	PS1	A revised set of grievance categories to be developed and used to give a more 'fine-grained' picture of the issues/events/actions which result in grievances and to enable trends to be identified easily	Minor	Closed (See section 5.5.4 of this report)
March 2021_014	Community grievances	Closure of grievances that complainants submit to a judicial or administrative process	PS1	Such grievances to be kept in the register until a) a formal decision is issued by the judicial/administrative authorities that the grievance will not be considered or b) a verdict is issued by a court or administrative entity. In	Minor	Closed (This recommendation is now CBG's practice)

				both situations, the grievance can be recorded as 'closed' with reference made to the decision or verdict.		
March 2021_015	Dredging	The 2020 dredging campaign did not strictly adhere to certain actions set out in the Dredge Management Plan.	PS1	<p>Consistent with the DMP, CBG to undertake: i) a complete environmental characterization of sediment (including bioassays if necessary) and ii) complete characterization of the benthic fauna, from both the dredging and disposal areas. The properties of the dredged material (including toxicity) and sensitivity of the receiving disposal site (benthos) to be established in a timely manner, particularly if the A4 disposal location is to be used in 2021.</p> <p>The turbidity sampling protocol should be reviewed and prior to future dredging campaigns to ensure a robust scientific approach is employed taking account of the variables (location of dredging, tidal conditions etc.) associated with each campaign</p>	Moderate	Superseded (see October 2021_012)
March 2021_016	SMB-W inspections	CBG is not aware of SMB-W's plans for demobilisation of its construction workforce, nor its plans for reinstatement of temporarily affected land, including land used for the informal settlements	PS1	CBG to engage with SMB-W and BGEEE in order to understand and influence SMB-W's plans for demobilisation of workers and reinstatement of temporarily disturbed land to ensure alignment with IFC PSs. This may be particularly important where contractors that are planning to demobilise will be required to reinstate disturbed areas before they leave. Rehabilitation completion	Minor	Closed (see Section 5.8)

				<p>criteria, including those relating to biodiversity, should be agreed.</p> <p>In the event weaknesses are identified, CBG to work with SMB-W and BGEEE to improve reinstatement practices.</p>		
March 2021_017	Emergency Response Planning	The exercise programme for 2021 has a bias towards fire-related incidents	PS1	CBG's HSECQ Department should have greater influence in defining future exercise programmes, taking account of CBG's full spectrum of activities and priority risk areas.	Minor	Closed
March 2021_018	Emergency Response Planning	CBG's current ERP does not recognise interaction with certain third parties, including GAC.	PS1	<p>The ERP to be revised in recognition of third parties involved/impacted by CBG's emergency response planning. This will include:</p> <ul style="list-style-type: none"> communications protocols, and <p>in the case of oil spills (and other scenarios as applicable), the sharing of response resources.</p>	Moderate	Open (pending receipt of updated ERP)
March 2021_019	Land Rehabilitation and Relinquishment	CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues, despite the MRCCP presenting priority actions to begin by end 2018 (with one to be completed by end 2018).	PS1	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.	Moderate	Open

March 2021_020	Reporting of COVID-19 cases	To date, surprisingly, no contractors have reported COVID-19 cases despite mandatory reporting of cases to CBG being required.	PS2	CBG to confirm that zero infections among contracted workers is correct and at the same time reiterate, to contractors, CBG's expectation for immediate reporting of any cases that occur.	NA	Open (in October 2021 COVID cases reported for just 2 contractors)
March 2021_021	Dissemination of the HR Manual, WGM and Code of Ethics	Actions have been taken to disseminate these three documents to employees and contractors, but dissemination is not complete.	PS2	Dissemination to employees and contractors to be completed as soon as possible accompanied by familiarization sessions during inductions supported by posters and other material introducing and explaining the WGM.	Moderate	Closed (Acceptable evidence of this dissemination has been provided by CBG. See section 6.3)
March 2021_022	Integration of LWC requirements in bid evaluation and contractor management	Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are: <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 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'.	PS2	CBG to ensure that: <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 	High	Open (CBG reports that these recommendations will be addressed in work to be done to strengthen contractor management in 2022 – see section 5.10 of this report)

				<p>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> <p>The HR Manual, WGM and Code of Ethics to be provided in all RFPs.</p>		
March 2021_023	Environmental Monitoring Programme – external laboratory	<p>The termination of a contract with an external laboratory, and the need to find a replacement laboratory, was reported previously.</p> <p>CBG has not been able to send environmental samples to external laboratories for well over a year, significantly affecting the quality of its monitoring data.</p>	PS3	As reported previously, contracts with external certified laboratories should be secured as a priority to enable CBG’s resumption of the full suite of analysis specified in its Environmental Monitoring Programme.	High	Closed
March 2021_024	Environmental monitoring – disclosure of results	Disclosure of environmental monitoring data to affected communities is occurring in some instances, such as noise and vibration in mining areas, but remains inconsistent across CBG’s broader activities.	PS3	Close interaction between the EMTL and the Community Relations team is required to identify disclosure priorities and improve disclosure of monitoring results. Such reporting of results must be consistent with the commitments made in the Stakeholder Engagement Plan as described in the IESC’s July 2020 monitoring report.	Moderate	Superseded (see Oct 2021_018)
March 2021_025	Water quality - Oil/water separator	As previously reported, oil concentrations in treated effluent leaving the oil water separator located adjacent to the tank farm in Kamsar continue to consistently exceed applicable IFC standard.	PS3	A rapid intervention plan to achieve compliance in the shortest timeframes possible should be presented to Policy Lenders and the IESC. In addition, CBG shall:	High	Superseded (see Oct 2021_022)

				<ul style="list-style-type: none"> provide its monthly oil in water monitoring results for the treated effluent to lenders in order to demonstrate short term actions are effective <p>increase the frequency of inspections of waste oil generating activities to prevent poor practices from reoccurring.</p>		
March 2021_026	Water Quality - Bypass of the Sangarédi WWTP	The WMP Action Plan includes specific actions relating to use of an untreated effluent bypass at the Sangarédi WWTP outside of emergency situations. Investigations scheduled for Q1 to Q3 2020 in the Action Plan have not occurred.	PS3	<p>CBG to investigate the use of the bypass, no later than end Q2, 2021. In the event that use of the bypass persists outside of emergency situations, the reasons should be determined, and corrective action implemented to minimise any recurrences. <i>Post-VSV Note: investigation and corrective actions have commenced.</i></p>	Minor	<p>Closed</p> <p>(reason for discharge related to ingress of rainwater to sewage network – mapping a repair of system underway)</p>
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>	PS3	<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 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 	High	<p>Open</p> <p>(unless struck out)</p>

				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.		
March 2021_028	Waste management	The Waste Management Plan dated January 2019 does not recognise CBG's longer-term strategy to deal with waste generated in Kamsar.	PS3	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. The CR team to engage with the affected community members prior transportation of wastes to Bendougou.	Moderate	Superseded (see Oct 2021_025)
March 2021_029	Hazardous materials management	Radioactive lightning rods are present on CBG facilities/stored in Sangarédi. These are prone to decay and damage over time and therefore need to be carefully managed. Currently the plan for ultimate dismantling and disposal of these radioactive sources is undefined.	PS3	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	Superseded (see Oct 21_026)
March 2021_030	Energy efficiency/GHG emissions	A number of discrete initiatives have been put in place to reduce GHG emissions, however further opportunities are likely across CBG's operations.	PS3	The IESC recommends opportunities for fuel efficiency/reductions in GHG emissions are made an integral part of the CBG procurement process via the forthcoming HSECQ 'Minimum Requirements' revision. Contractors' intentions regarding fuel efficiency/reductions in GHG emissions should be taken into consideration by the HSECQ team during the bid evaluation process.	Minor	Closed

March 2021_031	Blasting and community health and safety	In July 2020, the Blasting Protocol was reported to be undergoing amendment. In March 2021, eight months later, the Protocol is not yet approved.	Operations	All final-stage internal CBG reviews of the Blasting Protocol to be completed, as quickly as possible, with approval and full implementation following immediately.	Moderate	Closed (The Blasting Protocol was approved in August 2021 and is being implemented)
March 2021_032	Anti-malaria program implementation	Given that CBG put its anti-malaria program 'on hold' in 2020 and is ready to implement its contribution to the joint anti-malaria program, it is disappointing that the 2021 program has not been initiated, due to circumstances outside CBG's control.	All	CBG to continue to persuade and assist the Chamber of Mines to initiate the joint anti-malaria program as quickly as possible.	Moderate	Closed (CBG is taking the lead in implementing this program and has issued a ToR for an NGO implementing partner – see section 8.3 of this report)
March 2021_033	Community health and safety: Installation of bridges for pedestrians, bicycles and motorcycles (passerelles)	Since the July 2020 IESC site visit, the date for completion of the installation of the passerelles has been delayed by approximately 5 months. This delay is a concern as it extends the already elevated risk to community health and safety that resulted from the removal of the original passerelles.	Construction	CBG to consider all options that could 'fast-track' fabrication and installation of passerelles, without compromising occupational health safety and the long-term integrity of the installed passerelles, and then implement the selected option/s.	High	Closed (Installation of the passerelles has begun)
March 2021_034	Hamdallaye resettlement	Some infrastructure works remain to be completed (e. g. drainage).	Operations	Complete the outstanding infrastructure works prior to onset of the 2021 rainy season.	Minor	Open
March 2021_035	Fassaly Foutabhé	The school is not yet staffed.	Operations	Continue to liaise with "Inspection académique" (local education directorate) to ensure allocation of teachers.	Moderate	Open
March 2021_036	Hamdallaye livelihood restoration	Crops have been affected by pests. The benefit of the 2-year fallow period on the 56 hectares is questionable if no other	Operations	Ensure that CECI mobilizes appropriate agronomy expertise and consider alternative crops with better resilience to pests and mixed crops	Moderate	Open

		measures apart from provision of topsoil are taken to improve fertility.		and consider use of phosphorus and potassium fertilizers, as well as “green fertilizers”) to enhance the fallow period.		
March 2021_037	Hamdallaye livelihood restoration	The drip irrigation system is complex and entails strong collective management and maintenance capabilities.	Operations	Make sure ‘gardening’ IGA members are properly prepared for the management and maintenance of the relatively complex drip irrigation system, particularly all collective equipment, and that farmers know enough to do basic maintenance of drippers.	Minor	Open
March 2021_038	Hamdallaye livelihood restoration	28% of Hamdallaye residents have not enrolled in any of the livelihood restoration activities.	Operations	Document refusals to enroll and allow people that did not enrol to join later if they change their mind, to avoid issues at the completion audit stage.	Minor	Open
March 2021_039	Livelihood restoration	CBG incurs transaction costs arising from LRP preparation and implementation being linked to mining of individual plateaux. Six LRPs will be implemented in 2021 each potentially with different implementing partners with separate contracts, undertaking the same activities at the same time with PAPs belonging to neighbouring communities (or sometimes the same community as is the case for Parawi and Hamdallaye).	Operations	Consider grouping LRPs by time period for implementation, rather than by plateau, to reduce transaction costs.	Moderate	Open
March 2021_040	MUOA LRP	Livelihood restoration activities are planned to start in September 2021. This date is of concern as the MUOA LRP was finalized in September 2020 resulting in a period of almost one year before livelihood restoration measures will be	Operations	CBG to expedite appointment of an implementing partner.	Moderate	Open

		implemented for approximately 400 PAPs.				
March 2021_041	Cumulative impacts	There is no methodology for assessing cumulative land and livelihood impacts on the most affected communities, although CBG has obtained, recently, GIS tools that would allow such an assessment to occur.	Operations	Based on the current enhanced GIS capacity and using the survey results that were presented to the IESC during the site visit, develop a methodology to assess the extent of cumulative impacts on lands/livelihoods on the most affected communities and their overall viability.	Moderate	Superseded (by Recommendation October 2021_032)
March 2021_042	NoCo Exploration	Compensation is to be paid after the impact of land disturbance (economic displacement) occurs contrary to the requirements of PS5.	Exploration	Ensure that compensation is paid prior to the impact of land disturbance (economic displacement) occurs.	High	Closed (CBG has confirmed that payment will be paid before any disturbance – see section 5.3.2 of this report)
March 2021_043	NoCo Exploration	Contractors are likely to require temporary rights to use/occupy land for fly-camps and laydown areas.	Exploration	Ensures that agreements to use/occupy land for fly camps and temporary laydown areas are obtained and implemented in a PS 5-compliant manner whether negotiated by CBG and/or one its contractors.	Moderate	Open (No decision to undertake activities in NoCo area has been taken)
March 2021_044	Resettlement resources and capabilities	IESC is of the opinion that the Resettlement team remains under-resourced for managing implementation of all current RAPs/LRPs plus LRPs being prepared.	Operations	Continue to 'staff-up' with focus on livelihood restoration and/or consider a contractual arrangement with an "implementation coordination partner".	Moderate	Closed (An LR adviser will be recruited in 2022 and a contract is being sought with an "implementation coordination partner". Also, this item is superseded by recommendations on resourcing in this report – Table 9-1)

March 2021_045	Resettlement resources and capabilities	Gender imbalance in resettlement team.	Operations	Seek to reach a better gender balance in the resettlement team.	Minor	Open
March 2021_046	Resettlement resources and capabilities	The Resettlement Team now has a team member (services shared with the CR team) responsible for M&E implementation. However, the current M&E framework, as included in the latest LRPs, is too complicated and should be streamlined focusing on a limited number of key indicators. In addition, baseline data collection and integration into a database that will enable effective M&E implementation is now a priority.	Operations	Simplify the M&E framework for the LRPs under preparation and start M&E information collection and integration into a database as a priority task.	Moderate	Superseded (See recommendations on resourcing in this report – Table 9-1)
March 2021_047	Resettlement resources and capabilities	Limited tenure of the expatriate Resettlement Manager and material risk of adverse consequences for resettlement planning and implementation if management continuity is not maintained.	PS5	Ensure momentum of livelihood restoration work is not affected and give consideration to extending or renewing the expatriate Resettlement Manager's contract is for a period of time that will enable all LRPs (includes the livelihood restoration component of the Kankalaré RAP) to be in place with all cash and/or in-kind compensation delivered and livelihood restoration measures being implemented effectively.	High	Superseded (the Resettlement Manager is no longer with CBG. A Temporary Resettlement Specialist is in place whilst a permanent replacement is sought)
March 2021_049	BAP	Prior to delivery in line with the ESAP deadline, work to date on the new BAP was delayed on several occasions. Further work is required in the process of updating the BAP, namely the completion of the BMEP to replace the biodiversity sections of the EMOP and further development of the No Net Loss and Net Gain Tracker. Consequently, there is the	PS6	Provision of monthly updates delivered during the bi-weekly E&S calls. These updates to cover the progress of the scheduled BAP actions and immediate notification of any expected delays.	Minor	Superseded (see October 2021_041)

		potential for these longer timescale action to also be delayed.				
March 2021_050	Five Year Mine Rehabilitation Plan	The plan contains insufficient information on measures to address limited topsoil for rehabilitation and how the approaches to addressing rehabilitation are communicated to local communities.	PS6	Updated Plan to contain information on the various approaches CBG might take to rehabilitate areas when topsoil is limited and how CBG will liaise with local communities to communicate its approach for rehabilitation and the need to balance use of rehabilitated land for agriculture with the creation of natural habitat.	Moderate	Open
March 2021_051	Cultural Heritage	The cultural heritage management component of the draft HSECQ 'minimum requirements' does not include, explicitly, a clause requiring implementation of the 'Chance Finds Procedure'	PS8	A requirement to implement the 'Chance Finds Procedure' to be included into the HSECQ 'minimum requirements' before they are approved.	Minor	Closed (This requirement is not included in the HSECQ 'minimum requirements' - see section 11.2)

Appendix 3.2 - Status of residual issues that pre-date the March 2021 site visit report.

Note, issues previously categorised as either superseded or closed, as reported in the March 2021 IESC monitoring report, are not repeated in this table.

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
July 2020_ 002	HSECQ resources – recruitment and succession planning	There has been a relatively high turnover of senior staff with posts remaining vacant for several months at a time. The overall result has been detrimental to CBG's management of HSECQ matters.	PS1	The recruitment process and role of the parties responsible for recruitment and succession planning to be reviewed, to try to avoid periods in which key HSECQ positions remain vacant thereby improving continuity of the team and knowledge base. Measures to recruit and retain key staff, including alternative conditions of employment to be considered.	Moderate	Open
July 2020_ 004	SMB-W railway	Several poor practices have been identified at SMB facilities that are encouraging influx and sales of bushmeat. In addition, CBG inspections have resulted in anecdotal evidence of poor working conditions.	PS1	Additional consideration to be given to compliance against PS2, Labour and Working Conditions, in CBG inspections. In particular, CBG to consider influx, endeavour to inspect workers' camps and conditions, and speak to workers about contractual conditions, as soon as travel restrictions permit.	Moderate	(IESC acknowledges that recent Inspection reports show enhanced consideration of labour/working conditions has occurred despite continuing COVID-19 restrictions) Closed (construction has ended)
July 2020_ 005	CR and Resettlement Teams' staffing levels and access to external assistance	The CR and Resettlement teams will remain under considerable pressure to maintain effective delivery of their responsibilities plus any new functions that may be allocated to them. With the completion of Phase 1 of the Expansion Project, the IESC considers that it is	PS1	Review the staffing situation, irrespective of planned addition of any new staff members by end 2020, in the context of the expected role/workload for the CR and Resettlement teams and the role and size of similar departments in other	High	Open (The draft Time-bound Recruitment Plan [up to 31 December 2023 (Version 2)] has been prepared and is under the final stages Lender/IESC review)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
		appropriate to restate and update its main staffing recommendation, presented in its July 2019 monitoring report.		<p>mining companies in Guinea and other West African countries (benchmarking).</p> <p>Following this review the HSECQ department will prepare and implement a Time-bound Recruitment Plan (2021 to 2023) to achieve the required complement of staff and 'on-call' consultancy resources (perhaps via a framework contract with a multi-disciplinary consultancy or framework contracts with several specialist consultancies), Finance needed to ensure implementation of these actions to be included into the appropriate budget.</p>		
July 2020_006	CR and Resettlement Teams' capacity and resources	The Time-bound Recruitment Plan requires a mechanism to be in place to deploy, effectively, all personnel and resources in the future.	PS1	Prepare and implement a time-bound Capacity Development and Resource Acquisition Plan (2021 to 2024). This Plan to include inter alia: acquisition/provision of adequate technical resources (such as GPS handsets, digital platform/s and vehicles), training in the use of equipment and the digital platform/s, and establishment of a continuing professional development procedure focusing on provision of training.	High	<p>Closed</p> <p>(Version 2 of the Capacity Development and Resource Acquisition Plan (2021 to 2024) was prepared and is being implemented)</p>

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
July 2020_ 007	Stakeholder Engagement Plan (SEP)	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 necessary for an overall SEP revision/update to occur.	PS1	Revise/update and re-issue the SEP. This revised/updated SEP should be clearly time-bound (January 2022 to December 2025) and disclosed publicly. The current 2019-2020 Action Plan to be extended until the 31 December 2021 to cover the period before the revised/updated SEP is operational. This extended Action Plan will be aligned with the current version of the SEP (as amended to incorporate the MUOA Project).	Moderate	<p style="text-align: center;">Open</p> <p style="text-align: center;">(A first draft of the SEP (2022-2025) was issued on 02 December and is under PL/IESC review.</p> <p style="text-align: center;">Closed</p> <p style="text-align: center;">The current 2019-2020 Action Plan was extended until the 31 December 2021.)</p>
July 2020_ 008	Community Grievances	Continuing lengthy delays in closing out certain grievances	PS1	Strengthen the ability of the HSECQ Monthly Committee Meeting to act promptly to ensure that there are no institutional 'barriers' to speedy actions in terms of: i) recognising the legitimacy of grievances; and then ii) implementing the actions to close them as quickly as possible.	Moderate	<p style="text-align: center;">Open</p> <p style="text-align: center;">(IESC notes that there are fewer lengthy delays in closing grievances)</p>
July 2020_ 012	Workers' Grievance Mechanism	There is no PS-2 compliant Workers' Grievance Mechanism that covers both CBG and contractor workers (there is an approved Workers' Grievance Mechanism aimed at contractors and a draft CBG-focused Workers' Grievance Mechanism).	PS2	Once the Workers' Grievance Mechanism is approved, CBG to disseminate it to all CBG personnel and all its contractors, needed for its core business processes (as defined by PS2), for adoption by all contractors that do not have a PS2-compliant Workers' Grievance Mechanism. CBG and Contractors will reinforce the message to both their	Moderate	<p style="text-align: center;">Closed</p> <p style="text-align: center;">(The Workers' Grievance Mechanism has been finalized and disclosed to all CBG employees and contractors. See section 6.3)</p>

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
				own staff members, and in the case of contactors to sub-contractors, that CBG operates a procedure whereby all direct and contracted workers can submit grievances. As appropriate, the role of any recognized trade unions in the procedure must be conveyed to workers and to union representatives who interact with company managers on behalf of the workers.		
July 2020_013	Worker demobilisation	The final demobilisation period of the Phase 1 Expansion Project will occur soon.	PS2	CBG to prepare a Worker Demobilisation Plan and a Demobilisation Close-out Report for the remaining Phase 1 Expansion workers to be demobilised and who are still employed to construct houses. The Plan must include a requirement for CBG to undertake an audit of the supervisory contractor's procedure, and accompanying documentation, for managing the demobilisation process.	Minor	Superseded/Open (No demobilisation plan was prepared since the date that the requirement for preparation of such plans was included in the Contractor Management Plan – superseded on the basis that all phase 1 contractors have demobilised)
2020_019	Water quality – WWTP at Sangarédi	The installation of the UV treatment plant at the Sangarédi WWTP remains an outstanding issue despite the plant being in-country.	PS3	Priority should be given to completion of this installation to prevent further delay, pending the lifting of current COVID-19 travel restrictions.	Moderate	Open Good progress made by Oct 2021, UV plant in place but remained to be commissioned
July 2020_021	Water quality – reporting in the AMR	The AMR indicates that several samples and/or analyses were not conducted in accordance with the EMoP. The AMR	PS3	Where there are exceedances against applicable standards, or samples/analyses could not be taken,	Minor	Closed (reporting in the 2020 AMR is generally better than

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
		further indicates that measures/actions plans are underway to address exceedances, however there is little detail about the actions taken or the timeframes for such actions.		the reasons for such omissions should be detailed in the AMR. Corrective actions with indicative timeframes should also be described in the AMR.		2019 although few water sample results were presented in the 2020 AMR)
July 2020_026	Community H&S risks	The rail-related risk to community members has increased over the past two years and will continue to increase until end 2022.	PS4	The Rail Safety Management Plan (and Action Plan) to be revised and updated as a priority and every effort made to ensure that the current schedule for installation of crossings such as footbridges does not experience delays.	Moderate	Open (The revised Rail Safety Management Plan (and Action Plan) is being reviewed currently by PLs/IESC. Some additional delays have occurred causing the completion date for installation of crossings to be pushed back ~ 1 month for completion of all 12 passerelles)
July 2020_028	Hamdallaye resettlement – resettlement site	Outstanding works (runoff drainage, access roads to agricultural land, teachers’ houses, plantations near community facilities, etc...) need to be completed	PS5	Expedite procurement and execution of the few outstanding works (runoff drainage, access roads to agricultural land, teachers’ houses, plantations near community facilities, etc...). Works to be completed by end of 2020.	Moderate	Open (Pending remaining drainage works. See section 9.1.2)
July 2020_029	Hamdallaye resettlement – resettlement site	Housing and infrastructure deficiencies and ‘open’ residents’ grievances	PS5	Implement a rapid PAP satisfaction survey after the end of the rainy season to identify any deficiencies so that they can be addressed timely. To be done in Q4 2020.	Moderate	Superseded (Now captured as an ESAP item. See also section 9.1.2)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
July 2020_ 035	REB: landscape scale initiatives	The CBG biodiversity team has an opportunity to develop and lead best practice in mine rehabilitation through its current presidency of REB and activities on site.	PS6	The biodiversity team should continue to be supported by management with sufficient resources to maximise the REB opportunities. Within CBG, management should ensure an integrated approach to rehabilitation between the Biodiversity and CR teams. CBG should develop a work plan for its presidency of REB, including resource and cost information. The IESC notes that IFC is interested in attending a REB meeting as an observer if possible.	Moderate	Open (open as it is ongoing. Note, good progress with CBG using its presidency to move the REB plans forward. Specific actions such as agreeing a budget, appointing a consultant, publishing guidance will act as KPIs of progress.)
July 2020_ 037	Collaboration with GAC	Successful collaboration with GAC is key for the success of the Boulléré onsite offset as the offset area crosses concession boundaries.	PS6	Need for closer collaborative working, on the offset, to be raised to a higher management level in CBG's discussions with GAC, to help ensure the success of the offset, to the benefit of both companies.	Moderate	Closed MoU between CBG and GAC has been signed.
July 2020_ 039	Marine Surveys	New marine surveys are required in order to ensure that the baseline is sufficiently robust, both temporally and spatially, to inform future activities such as the planned dredging in 2021 and, also, conservation efforts to deliver No Net Loss/Net Gain.	PS6	Surveys must be completed in a timely manner prior to future dredging activities/use of new dredge spoil disposal site(s).	Moderate	Closed (IESC has seen contract for marine surveys)
July 2020_ 040	Base location for Biodiversity team	The Biodiversity team is based in Kamsar and make long journeys to Sangarédi for any site work or meetings. Being based	PS6	The Biodiversity team should have a permanent base in Sangarédi as well as one in Kamsar.	Minor	Closed (majority of team now based in Sangarédi)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
		in Sangarédi would allow the team more flexibility to work to the best of its ability.				
July 2019_004	Security management	The HSEC briefing given to the IESC and Lenders did not include information about site evacuation in case of a major security issue.	All / PS4	CBG should strengthen its induction procedure(s) to ensure visitors are aware of the procedure to follow in case of a site evacuation.	Moderate	Open (unable to close via VSVs)
July 2019_006	PbP approach	During the July 2019 visit the IESC was informed that the PbP reference document was undergoing review by senior discipline leads. To date CBG has not performed modelling studies in support of the PbP approach.	Operations / PS1	The reference document should be finalised a matter of priority. Any decision not to perform environmental modelling in support of the PbP approach needs to be justified and agreed with Lenders.	Moderate	Closed (Reference Document finalised). HOLD (pending revision of EMPs in Q1 2022)
July 2019_015	Waste recycling	To date there has been no representative from the HSEC team participating in the recycling committee.	Operations / PS3	The HSEC is seeking representation from its team. The IESC strongly supports this measure.	Minor	Open (follow up required during the next site visit)
July 2019_018	Security provision by contractors	Currently, Sogea Satom (one of the MUA contractors), employs three security providers. The guards are not formally trained. Most guards come from the local communities and are not armed. This lack of training poses a risk to CBG.	All / PS4	CBG to review its supervision with respect to contractors and the hiring and deployment security providers to ensure that contractors' practice is aligned with CBG's own practice with respect to hiring and deployment of private security providers.	Minor	Open (Security guards are provided by SOTRAC (a TPE [small or medium-sized enterprise] established by CBG to provide speciality services to CBG) and IESC understands that they undergo the same training as other security providers. To be confirmed in the next site visit in Q1 2022).

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July 2019_ 028	Kankalaré resettlement – RAP	The RAP does not include a livelihood restoration programme.	Operations / PS5	Devise a livelihood restoration programme for Kankalaré based on principles similar to those applied for Hamdallaye and amend the RAP accordingly.	High	Closed (The Plan is now renamed the Kankalaré Resttlement and Livelihood Restoration Action Plan and it is under PL/IESC review).
July 2019_ 029	Kankalaré resettlement – measures for host communities	Limited progress on measures meant to offset impacts to host communities of Kankalaré resettlement.	Operations / PS5	Expedite planning and implementation of these measures: a road to Parawi village and for Telebofi: provision of footbridge over the railway; erection of fencing along railway for the stretch where the railway passes beside the village; and iron-removal devices for wells.	High	Closed (All required infrastructure is in place).
July 2019_ 030	Forthcoming compensation (Thiapikouré plateau)	The Thiapikouré plateau, which is not currently covered by a RAP or LRP, will be mined in near future. Surveys have been carried out and compensation was about to be paid at the time of the July 2019 visit.	Operations / PS5	Prepare an LRP for economic displacement resulting from proposed mining on this plateau.	High	Open (The LRP is being prepared and is under PL/IESC review).
July 2019_ 032	Forthcoming compensation	Criteria for deciding on applicability of the 'streamlined compensation approach' or another resettlement planning tool are not clear.	Operations / PS5	Clarify criteria under which the 'streamlined compensation approach' is acceptable, agree these with IESC and Policy Lenders, and revise the Resettlement Policy Framework accordingly.	High	Open (Revised Compensation and Resettlement Policy Framework is under review by Lenders/IESC but is not yet finalised).
July 2019_ 035	All activities – Gender and inclusiveness aspects	The CBG team do not necessarily require presence of women and youth in community meetings.	Operations / PS5	Ensure that the presence of women and youth is required at all stakeholder engagement events.	High	Open (IESC acknowledges CBG is implementing several approaches to increase

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
						female participation – see item March 2021_010 above).
July 2019_039	Freshwater Fish Critical Habitat	Actions 197-201 of the BMS remain uncompleted despite them relating to a critical habitat issue and the requirement for them needing to be progressed having been discussed repeatedly since 2017.	PS6	Whilst it is acknowledged that the PbP approach aims to avoid impacts on all watercourses, these actions must be enacted immediately to provide the IESC with confidence that they can and will be fully addressed.	High	Open (CBG is working with a specialist eDNA company to progress eDNA surveys and is progressing a physical survey for freshwater fish. To be closed following receipt of study reports)
July 2019_042	Boulléré KBA - Chimpanzee studies	Sylvatrop also completed a study of chimpanzees for GAC.	PS6	CBG should liaise with GAC to agree to work collaboratively on the subject of chimpanzees in the Boulléré KBA as it is likely to be the same group of animals using both concession areas. (This recommendation mirrors recommendation Dec 2018_33 which had not been completed by July 2019).	Low	Closed (MoU with GAC in place. Effectiveness of collaboration will continue to be the subject of ongoing IESC monitoring)
July 2019_044	COBAD Road	CBG is actively restoring the COBAD road.	PS6	The restoration of the COBAD road completed to date is excellent and appears to be successful. However, the IESC suggests that in those locations where the remaining unrestored road is wide enough for vehicles to pass, these should be reduced to the width of a path, non-passable by vehicles. Exceptions to this may be acceptable where particular needs necessitate, however	Moderate	Open (requires in country site visit to close)

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
				the potential impacts upon biodiversity of such exceptions must be considered in detail, particularly where the impacts challenge the effectiveness of conservation efforts in the area.		
Dec 2018_001	Audit programme	The current audit and inspection procedure is dated Jan 2014 and was scheduled for review in 2016. It is unclear whether the review took place.	All	The procedure should be reviewed and updated if necessary, to ensure it reflects current practice.	Minor	Open (HOLD – request latest version of audit and inspection procedure)
Dec 2018_005	Community grievances	There are 4 legacy grievances that remain open.	Construction	CBG should decide soon whether there is a realistic possibility of closing any of the old open grievances, and if not, to close them officially. This action will require informing the complainant/s of the decision with reason/s provided and then recording the decisions (with reason) to close them in the grievance register.	Minor	Closed (The last of the 4 legacy grievances (Bintimodia village and closure of sand quarries) was closed following completion of the rehabilitation of the access road on 24 May 2021. One of the other grievances entered the judicial process).
Dec 2018_009	Oil spill at the Filima power plant	CBG reported a Spill of 6437 litres inside the Filima Power plant via the GFA (a Class I Non-Conformance).	Operations	CBG to implement the actions identified in the incident investigation report. Furthermore, CBG should review the design of the fuel storage area, and in particular the need to elevate large volumes of fuel at height.	Minor	Open (HOLD -Pending information on corrective actions implemented).
Dec 2018_011	Waste management –	Anecdotal evidence was provided indicating that people scavenge from the site once security personnel are off duty.	Operations	CBG should confirm whether people are scavenging when the guards are not present and review the	Minor	Closed

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
	Sangarédi landfill			effectiveness of the security presence and the risk posed to community members in the light of its findings. In the event people are scavenging in hours of darkness, the effectiveness of the security presence, in terms of protecting human health, should be reviewed.		(security presence remains, and fencing has been erected as of October 2021).
Dec 2018_013	Noise mitigation – surface miners	The surface miner was broken at the time of the visit. The possession of a single surface miner represents a risk to CBG’s ability to implement the key noise mitigation measure in proximity to sensitive receptors i.e. where use of surface miner is required in place of blasting.	Operations	CBG should expedite the intended procurement of additional surface miners to ensure breakdowns/maintenance of surface miner(s) does not limit ability to implement noise mitigation.	Minor	Closed (as of October 2021, CBG has 1 new surface miner on site and another on order).
Dec 2018_019	Construction of Parawi-Koobi haul road	A PS5 -compliant Resettlement Action Plan is required for the Kankalaré residents affected by the Parawi-Koobi haul road.	Construction/ PS5 and ESAP	Prepare PS5-compliant RAP within timescale stipulated in Section 13 of the 09 November 2018 version of the Resettlement Action Plan. As the timescale is short, CBG to accelerate the procurement of an external consultant to prepare the PS5-compliant RAP Update Resettlement Policy Framework in near future.	High (increased to High because relocation almost completed and there is no PS5-compliant RAP in place)	Open (A final version of the RAP, now an including an LRP and therefore referred to as an RLRAP, is under PL/IESC review). The revised and updated Resettlement Policy Framework is currently under PL/IESC review)
Dec 2018_029	Boullère/COBAD Road river crossings	Exposed riverbanks caused by excavation/construction works.	PS6	Rehabilitation efforts should continue, to ensure that silty run-off does not occur in the wet season, when further excavation/construction activities are	Moderate	Open (IESC wishes to reserve judgement until an 'in

ID	Aspect	Issue Description	Standard/ Phase	IESC Recommendations (from December 2018 Report)	Significance	Open/Closed (Current IESC Opinion in October 2021)
				scheduled as part of the restoration of riverbank profiles.		person' site visit can be performed)
Feb 2018_020	Security of tenure for Hamdallaye villagers	Provision of confidence to Hamdallaye villagers that they will not be relocated again.	Construction	Dissemination of reasons, to Hamdallaye residents and Advisory Committee, which explain why relocation will not occur again. Recording of agreements (in the form of a meeting Minute (<i>Procès Verbal</i>)).	Moderate	Open (To be checked in next CBG/IESC/PLs Technical Resettlement Ccall or during next IESC site visit)
Feb 2018_036	West African Red Colobus	The West African Red Colobus occurs on an island located between CBG's North Cogon concession and COBAD.	All / PS6	Make best endeavours to influence and support COBAD to implement appropriate mitigation measures to protect the habitat for this species.	Minor	Open (Progress made. CBG undertook monitoring studies for the species on the island in 2018 and 2019 and the results will be used to develop a management plan for discussion with COBAD).
July 2017_038	COBAD Road	Restoration of river crossings yet to be initiated and no clear identification of responsible party to complete the works. Significant risk from sedimentation into gallery forest and watercourse critical habitats.	All	A restoration plan for the rivers needs to be developed. The responsible party to complete the works need to be identified and the budget made available. Liaise with COBAD over works required to prevent sedimentation into gallery forest and watercourses.	High	Open (Issue to be revisited during next in-country IESC monitoring visit before closing).

APPENDIX 4 STATUS OF ESAP ITEMS

	<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	Final version submitted by CBG. Residual IESC comments to be addressed
		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	Draft received Final Pending (due 31/03)
		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	Pending (due 2024)
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	Open (redacted version disclosed unsatisfactory to Lenders)

		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)	Open (pending comments from Lenders)
		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.	Pending approval by Lenders
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.	Open (final version requires sign off by IESC)
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).	Open (pending IESC sign off)
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.	Open (pending approval by Lenders)
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.	Open (pending further maintenance/ upgrade required)
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.	Open (pending comments from lenders)

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	Open (pending finalisation of NVMP)
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.	Ongoing (with IESC for review)

		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	Open
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	Open (pending budget estimate for Rail safety Plan)
12j	E&S Management Plans	Finalised Emergency Response Plan.	20/05/2021	Final Emergency Response Plan Signed off by IESC.	Open (pending final approval)
13	E&S Management Plans	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.	31/12/2022 (Subject of a waiver)	A Final AQMP.	Open (pending ability to undertake wet season stack emission monitoring)

14	Worker Demobilization	<p>Prepare</p> <p>i) Worker Demobilization Plans and</p> <p>ii) 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>iii) 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	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.	31/12/2022 (Subject of a waiver)	Design Agreed for Pollution Prevention Upgrade/Repair works completed	Open
16	Community Mobility and Livelihoods	Develop a Scope of Work for an external consultancy and a Request for Proposals issued.	15/11/2020	SoW agreed	Closed
		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.	24/02/2021	Study commissioned	Closed
		The study report to include recommended measures to mitigate adverse impacts.	30/09/2021	Draft Study	Closed
		Based on the results of the study, CBG shall seek to agree with the Policy Lenders on mitigation measures to be implemented by CBG.	30/10/2021	Signed off by IESC and Policy Lenders	Open
		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.	30/10/2021	Signed off by IESC and Policy Lenders	Open

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.	Open
		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.	Open
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	Open (ongoing iterative review)
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 corrective action plan with budget to cover implementation. CBG to complete implementation of the Corrective Action Plan.	31/01/2021	Budget Approval	Closed
			As per the time bound by the Corrective Action Plan	Completion of actions specified in Corrective Action Plan.	Open

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	Open
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.	Open
			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, Kagneka and Parawi by proposed mining activities and haul roads. CBG agrees that no additional land take causing displacement in N'dangara, Kagneka 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	Open (pending revision of final draft)
25b	Economic displacement (i) Thiapkhoure 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.	Open (pending revision of final draft)
		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	Open
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	Open
29	Halco E&S Support	<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>	30/11/2020	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.	Closed