

Intended for

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 02 September 2016 (as amended and restated on 06 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").

Date

November 2023

Project Number

1620009030-004

CBG BAUXITE MINE ENVIRONMENTAL AND SOCIAL MONITORING REPORT – JUNE 2023

**CBG BAUXITE MINE
ENVIRONMENTAL AND SOCIAL MONITORING REPORT
– JUNE 2023**

Project No. **1620009030**
 Issue No. **V4**
 Date **24/11/2023**
 Made by **N Laurent, P Piot, C Lissandrello, A Fitchet, V Saille**
 Checked by **N Laurent**
 Approved by **C Halliwell**

Checked by:	N Laurent
Approved by:	C Halliwell

This report is produced by Ramboll at the request of the client for the purposes detailed herein. This report and accompanying documents are intended solely for the use and benefit of the client for this purpose only and may not be used by or disclosed to, in whole or in part, any other person without the express written consent of Ramboll. Ramboll neither owes nor accepts any duty to any third party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by their reliance on the information contained in this report.

Version Control Log

Revision	Date	Made by	Checked by	Approved by	Description
V1	16/08/2023	AF, CL, PP, VS, NL	NL	CH	First draft to CBG and Policy Lenders
V2	11/09/2023	AF, CL, PP, VS, NL	NL	CH	Second draft following CBG review for factual accuracy
V3	16/10/2023	AF, CL, PP, VS, NL	NL	CH	Third draft following the policy lenders comments
V4	24/11/2023	AF, CL, PP, VS, NL	NL	CH	Final version (redacted for disclosure)

Ramboll
 2nd Floor
 Bewley House
 Chippenham
 SN15 1JW
 United Kingdom
 T +44 1225 748 420
 www.ramboll.co.uk

CONTENTS

ACRONYMS AND ABBREVIATIONS	I
EXECUTIVE SUMMARY	1
1.1 Systemic issues	2
1.2 High significance findings	4
1.3 Repeat findings	7
2. INTRODUCTION	9
3. SCOPE AND STRUCTURE OF THE REPORT	12
3.1 Scope	12
3.2 Project Standards	12
3.3 Structure of the Report	12
4. PROJECT STATUS	14
4.1 Status of the Expansion Project	14
4.2 Status of MUOA Project	14
4.3 Status of South of Cogon activities	15
4.4 CBG activities in the North of Cogon Concession Area	15
4.5 CAO Process	16
5. SIGNIFICANCE ASSESSMENT	17
5.1 Review findings	17
5.2 Assessment of significance	17
6. PERFORMANCE STANDARD 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS	18
6.1 HSECQ Resources	18
6.2 Stakeholder engagement	25
6.3 Grievance Management	28
6.4 Integrated Management System	33
6.5 Environmental and Social Management Plans and Action Plans	34
6.6 Procurement	35
6.7 Management of Change	35
7. PERFORMANCE STANDARD 2: LABOUR AND WORKING CONDITIONS	39
7.1 Introduction	39
7.2 Labour and working conditions (general observations)	39
7.3 Identification of OHS risks and impacts	40
7.4 OHS system	42
7.5 Organizational capacity and competency	42
7.6 Workers Engaged by Third Parties	43
7.7 Monitoring and review	44
8. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION	50
8.1 Implementation of Environmental Management Plans	50
8.2 Environmental Monitoring	50
8.3 Water Quality	51
8.4 Waste Management	60
8.5 Air Quality	62
8.6 Noise and Vibration	64
8.7 Resource Use and Energy Efficiency	66
8.8 Soils	66
9. PERFORMANCE STANDARD 4: COMMUNITY HEALTH, SAFETY, AND SECURITY	71

9.1	Communicable Disease Prevention	71
9.2	Community drinking water	71
9.3	Rail and Community Health and Safety	72
9.4	Mining site and Community Health and Safety	75
9.5	Blasting Protocol Implementation	75
9.6	Community Development	76
9.7	Influx Management	79
10.	PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT	82
10.1	Validation of the Resettlement Policy Framework and resolution of PS5 systemic issues	82
10.2	Hamdallaye and Fassaly Foutabhé RAP: Status, Assessment and Recommendations	82
10.3	LRPs	87
10.4	Exploration in North Cogan	92
10.5	Cumulative Impacts	92
10.6	Grievances	93
10.7	ESAP 21, historic land takes and retrocession of rehabilitated land	94
10.8	Monitoring	94
11.	PERFORMANCE STANDARD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES	99
11.1	Introduction	99
11.2	General Progress Update	99
11.3	Staffing and Equipment	99
11.4	Biodiversity Inspections	101
11.5	Rehabilitation	101
11.6	Biodiversity Action Plan (ESAP Item 26)	102
11.7	Integrated Landscape Management Plan (ESAP Item 28)	103
11.8	Site Visit	104
12.	PERFORMANCE STANDARD 8: CULTURAL HERITAGE	108

LIST OF FIGURES

- Figure 6-1: HSEC Organigram
- Figure 6-2: Environmental Monitoring Team Organigram
- Figure 6-3: SEP Action Plan Status as of 30 April 2023
- Figure 6-4: Meetings by zone and type of activity as of 30 April 2023
- Figure 6-5: Grievance status 2020-2022 (dark blue: received complaints, grey: closed complaints, light blue: complaints currently addressed)
- Figure 6-6: 2023 Grievance status by category
- Figure 6-7: CR team contacts (stickers)
- Figure 6-8: Status of Community Requests for Assistance in 2023
- Figure 6-9: Status of Community Requests for Assistance in 2023
- Figure 8-1: Status of Water Management Action Plan implementation (as of 31st May 2023)
- Figure 8-2 The 'grand Canal'
- Figure 8-3: Status of AQMP implementation
- Figure 8-4: Implementation of N&V Action Plan - actual progress compared with planned schedule
- Figure 11-1: Biodiversity Roadmap Progress
- Figure 11-2: Proposed Biodiversity Team Structure for 2024

Figure 11-11-3: Locations Visited within the South Cogon Concession between 6th-8th June

Figure 11-4: Locations Visited during Site Visit

Figure 12-1 Status of the Cultural Heritage Management Action Plan

LIST OF TABLES

Table 5-1: Example of the Summary Table Format	17
Table 6-1: Summary of Findings, PS1	36
Table 7-1: Summary of Findings, PS2	47
Table 8-1: Summary of Findings, PS3	67
Table 9-1: Summary of Findings, PS4	80
Table 10-1: LRPs in progress.....	87
Table 10-2: Summary of Findings, PS5	95
Table 11-1: Summary of PS6 Findings	107

APPENDICES

Appendix 1

Site Visit itinerary

Appendix 2

Status of ESAP items (as of June 2023)

Appendix 3

Status of Issues Identified in Preceding Monitoring Visits

ACRONYMS AND ABBREVIATIONS

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

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

Acronym	Meaning
PRAMS	Income Generating Activities Programme
PS	Performance Standard
PWDs	Persons With Disabilities
RAP	Resettlement Action Plan
REB	Réseau Environnement Bauxite (The Bauxite Environment Network)
RfPs	Requests for Proposals
SEP	Stakeholder Engagement Plan
SMB	Société Minière de Boké
SMPs	Social Management Plans
SNAPE	National Water Supply Point Management Services
SOP	Standard Operating Procedure
SO ₂	sulphur dioxide
ToR	Terms of Reference
VSV	Virtual Site Visit
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') in Guinea.

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

The IESC's scope of work allows for two in-country monitoring visits each year during the construction of the Phase 1 Expansion Project and/or during the construction of the Sangarédi to Kamsar Railway Upgrade Project associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes the monitoring of health, safety, environmental and social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG's Health, Safety, Environment, Communities and Quality (HSECQ) Department and are managed under the same E&S management system. This report provides the findings of an in-country site visit undertaken in June 2023.

A series of inspections, meetings and interviews were undertaken during the week commencing 5th June 2023. The meetings/interviews were held in person and involved representatives from the IESC, CBG, CBG contractors, stakeholders and the Policy Lenders.

During the site visit, the following topics were of primary focus:

- HSE&S:
 - 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 on Environmental and Social Sustainability (2012);
 - Follow-up on those 'open' issues identified during previous site visits;
 - Contractor management;
 - Environmental management (air, water, waste, hazardous materials, noise and vibration);
 - Resource use and energy efficiency; and
 - North of Cogon (NoCo) and South of Cogon (SoCo) exploration.
- Labour and working conditions:
 - Workers Grievance Mechanism;
 - Workers engaged by Third Parties;
 - Occupational Health and Safety.
- Stakeholder engagement:
 - Community Relations Team (staffing and resources);
 - Female participation in stakeholder engagement meetings;
 - Engagement with People with Disabilities (PWDs);
 - 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:
 - Resourcing levels, organization and structure;
 - Inspection and land rehabilitation;
 - Biodiversity Action Plan (BAP) and Biodiversity Monitoring and Management Plan (BMEP); and
 - Integrated Landscape Management Plan (ILMP).
- Resettlement:
 - The implementation status of the Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP);
 - The implementation status of the Livelihood Restoration Plans (LRPs);
 - The update of the Resettlement Policy Framework;
 - The validation of LRPs;
 - Cumulative impacts;
 - PS5-related grievances;
 - Resettlement implementation capacity.

The implementation of the Environmental and Social Action Plan (ESAP) was not discussed in detail during the site visit due to time restriction. Ramboll organised a specific meeting following the site visit on 20th June 2023 to address this point with the findings of that meeting reflected in this report. Progress is being made in closing ESAP items, but in general is slower than desired.

Furthermore, CBG is making progress on many fronts, albeit many actions (as specified in various Action Plans) are behind schedule. This report aims to capture areas of progress, typically via the update of earlier findings.

A list of High significance findings is provided below which provide specific examples of areas needing attention that were identified by the IESC during the June 2023 site visit. Many of these are repeat findings/are similar in nature to early findings and it has become apparent over the course of multiple IESC monitoring events that many findings result from systemic issues. These systemic issues were listed in the March and December 2022 reports and are described below along with updates based on findings from the June 2023 visit.

1.1 Systemic issues

1.1.1 HSECQ reliance on other CBG Departments/decision-makers

The HSECQ team has historically taken on primary responsibility for a large range of E&S issues relying on other departments to implement actions/remedial measures. Whereas the HSECQ Department's role as the lead entity makes sense, it was apparent that the HSECQ's priorities were not necessarily shared by other departments, and HSECQ's leverage over the other departments was limited. The IESC has previously reported improved interaction and ownership by other departments (through the appointment of Champions, supported by Sponsors (from different departments) for each environmental and social action plan) which resulted in shared priorities and good progress with many issues that had historically been held up. Notable progress on certain outstanding environmental issues that have benefitted from the shared multi departmental approach, for example, a long-standing concern over the poor functioning of an oil in water effluent treatment facility in Kamsar has been resolved, following the adoption of a multi departmental approach (notably involving CBG process engineers) and full commitment of Senior Management. Similarly good progress has been made in relation to the management of air quality; this progress is described later in this report.

1.1.2 Procurement Department

The IESC has previously reported on numerous delays resulting from the procurement of goods and services (such as the procurement for consultant contracts) and recommended a detailed review of CBG's current procurement procedures to identify bottlenecks and/or inefficiencies responsible for delaying the procurement of goods and services. No specific action has been taken in this regard.

CBG has no control over the issue of delays in the clearance of imported goods from customs; with the exception of continued engagement with customs officials.

1.1.3 Organisational capacity and resourcing levels

The IESC has previously recommended an increase in HSECQ resourcing levels to provide Team leaders to delegate responsibilities and have sufficient 'head space' to make strategic decisions. Several new appointments have been made since the previous site visit which respond to the recommendation (see Section 6.1). However, turnover of key staff, particular for those on short term contracts is inevitable. The IESC repeats its earlier recommendation that CBG affords greater effort to the timely replacement/succession planning for E&S key posts. In particular, the absence of a full time CBG employed Resettlement Manager is a long-term significant concern. It is understood suitable candidates have been selected and offers made, however candidates have not taken up the post, perhaps reflecting the competitive market for experienced resettlement specialists. CBG should gain a full appreciation of why candidates have been reluctant to take up the position and, given the critical nature of this post, put in measures to encourage successful candidates to take up the post when an offer is made.

There are also other examples where posts have been left vacant to the detriment of CBG's management of HSECQ matters. For example, the current lack of an Environmental Monitoring Team Lead and a recent break in the Resettlement Specialist's contract. Better forward planning is required to ensure employment/consultancy contracts are renewed in a timely manner/recruitment starts at the earliest opportunity to avoid prolong vacancies.

1.1.4 Safety culture

Efforts to improve the safety culture and safety performance continue. As reported previously, significant safety improvement will result from the future signalisation upgrades for the railway and more recently, from efforts by H&S teams to support technical teams in improving safety culture and further integrating risk ahead. CBG is also in the process of recruiting H&S professionals, and fine tuning its H&S management of contractors. However, at a local level, continued improvement is required, particularly in the management of local contractors (cf. the latest fatal accident), internal inspection and audit, asset integrity and incident investigation and close out. Finally, at a global level, a better distribution of teams will enable better analysis of KPIs and thus improve strategic objectives.

1.1.5 Resettlement

Progress on critical findings have been stalling for several years (RPF update¹, Hamdallaye security of tenure, cumulative impact, retrocession of rehabilitated land, monitoring, LRP validations², staffing of the resettlement team). Part of these findings requires inputs and/or actions and/or approval from other CBG departments. Resettlement Management should be integrated in the CBG roadmap, with sponsors and champions supporting the Resettlement department in tackling the high significance systemic issues.

¹ It should be noted that delays in the update of the RPF is not the sole responsibility of CBG as it involves lenders' approval. The draft document has been subject to many reviews and iterations between CBG and lenders in the past years.

² Same as footnote 1 above, LRPs require lenders' approval

1.1.6 Revision of Environmental and Social Management plans

Many of the current environmental and social management plans were prepared and approved in late 2018 or early 2019. A number of the plans are currently undergoing revision, however the revision of others has yet to start, resulting in a number of plans that do not reflect current status of CBG's operations making them increasingly less effective as operational plans. The IESC understands a review of the E&S management plans approved in later 2018/early 2019 will start in Q1, 2024³. This timeframe should not slip, and ideally be brought forward for those plans that are notable out of date.

1.2 High significance findings

A total of 44 new or updated findings (with accompanying recommendations) were identified during the June 2023 site visit. The High significance findings highlight those with relatively high risk of significant harm/non-compliance and the timing/urgency of actions needed to mitigate the actual/potential harm. In some instances, the 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 asterisk (*). Any change in the significance of an issue is also highlighted, where such a change is applicable. The High significance findings are listed below (on occasion consolidated)

1. **Organizational capacity and competence - staff resources.* A number of key HSECQ posts have been vacant for varying periods, including the Resettlement Manager position which has been vacant in post since October 2021. More recently (March 2023) the Environmental Monitoring Team Leader departed with the position remaining vacant at the time of the site visit (*post visit note: the position was filled in September 2023 during the drafting of this report*). . Finally, CBG's intentions with respect to the HSEC Director is unclear (currently there is an Action HSEC Director). This is considered to be a systemic issue as described above.
2. *Workers Engaged by Third Parties - Contractor Management.* Interviews with security guards contracted with local subcontractors showed working conditions requiring improvements in terms of labour and working conditions. Areas for improvements need to be identified (such as considerations of working hours reduction under Ramadan period). A revised Contractor Management Plan should be finalized as a matter of priority, with regular supervision of aspects relative to working conditions and human rights included in checklists and audits. A rapid audit of working conditions of security guards (and other local contractors) is to be conducted as a priority to verify any non-compliances/opportunities for improvements in terms of labour and working conditions.
3. Incident Investigations and Root Cause Analysis.

A fatality occurred on the in March 2023 and an incident and root cause analysis conducted as per internal procedures. However, a number of observations made by the IESC should be implemented to improve this procedure as follows:

- Greater involvement of representatives of companies implicated in accidents;
- Investigate the absence/lack of communication between the teams in charge of the works and the other teams involved on rail traffic regarding the progress of the works;
- Define methods for sharing H&S information between workers (shift changes);
- Strengthen the communication between the CCF and all workers (switchmen and flagmen) in the vicinity of the railway track; and
- A specific action plan should be prepared and discussed with all stakeholders using and working on the railway

4. **Communities' water resources.* CBG is responsible for avoiding or mitigating its impacts on water resources. Thus, CBG has a duty of oversight (and when required remediation) of

³ It is acknowledged that there are also a number of plans, most notably social plans, that have been undergoing a review process and are currently subject to IESC/Lenders review and sign off.

SNAPE action. CBG Therefore, it is important CBG ensures strong liaison with SNAPE to be informed on the water quality at the boreholes within the affected communities. This will enhance CBG knowledge of the boreholes (water quality, condition etc.) and will ensure a prompt response from CBG in case of exceedances of water quality parameters/the boreholes malfunction. CBG should develop a communication protocol with SNAPE regarding Communities' water resources monitoring.

5. *Community Health and Safety – Mine site Safety.* A fatality involving a community member occurred in May 2022 at a CBG constructed sedimentation basin at the Sangarédi mine site. Whereas as CBG promptly investigated the incident and implemented corrective actions to prevent a reoccurrence, the fatality was not reported to the IESC or Policy Lenders at the time or any period thereafter contrary to agreements in place. It is believed to be an isolated incident and the failure to notify the Policy Lenders/IESC a result of a communication breakdown/failure to follow procedure. Further mechanisms/awareness training of agreed notification procedures should be reinforced within CBG to ensure timely notification of lenders when serious incidents occur. In order to minimise the risk of similar community incidents in the future, and inspection programmes of CBG assets should be put in place to identify damage/vandalism of community safety measures e.g. check on the integrity of installed fencing intended to restrict access to dangerous areas. The IESC has been informed (post visit) that a programme of measures has been put in place; this will be subject to verification during the next site visit.
6. **Hamdallaye and Fassaly Fouthabé RAP (Security of tenure).* There has still been no formal progress in the State-endorsed allocation of residential land at the Hamdallaye resettlement site, despite an internal process devised between the Community Relations and legal departments. The security of tenure is critical for the closing of the RAP, and CBG should therefore complete the land tenure formalization and securitization process as soon as possible. This process will involve the active participation of the CBG Legal Team.
7. **Hamdallaye and Fassaly Fouthabé RAP (Livelihood Restoration).* Despite CBG efforts to rectify management of the CECI Program and new important infrastructure investment, the results are still disappointing and will not allow for the restoration of livelihoods. CBG took the decision to extend the LRP for 3-years with a new provider. CECI's contract ended June 2023 and the search for a new provider is at the Terms of Reference stage⁴, which means that there will be at least a 6-month gap in LRP implementation. As a result of this delay and the lack of assessment of the current livelihood status of the PAPs, CBG should provide a new interim support (food assistance) to the PAPs.
8. *Finalisation of other LRPs.* The delayed implementation of the Kankalaré, Thiapikouré and Kagneka LRPs (compared to the compensation date⁵), the potential lack of remaining agricultural land expressed by the Community (and not verifiable in the absence of a cumulative impact assessment) justify the requirement for renewed interim support (food assistance). CBG should therefore plan an additional interim support (food assistance) until LRP activities produce revenue for the PAPs.
9. *Approval of LRPs.* With the exception of the Hamdallaye and Fassaly Fouthabé RAP and MUOA LRP, none of the LRPs have been approved by lenders, though implementation has started for some of them. Both parties need to reach an agreement to close those documents, recognising they will not be fully aligned with the (yet to be validated) updated RPF. Agreement with Lenders on how to address the discrepancies with the new RPF is

⁴ CBG indicated in September 2023 that they are now discussing the proposal with an identified provider.

⁵ Dates of compensation: July 2019 for Thiapikhouré, between February 2018 and April 2021 for Kankalaré, late 2021 for Kagneka. For Kankalaré et Thiapikhouré LRP, implementation started in Q2 2023. For Kagneka, the implementation has not started at the time of the visit (contract just awarded)

required and could potentially be treated as part of the historic land take/legacy issues. Once approved, these approved LRPs will need to be shared with the PAPs.

10. **The updated Resettlement Policy Framework (RPF)*, including updated compensation matrix, has been pending validation for more than two years pending agreement on its finalisation with the Lenders with several ramifications on other RAPs/LRPs and overall implications for CBG's management of resettlement issues. The IESC recommends organizing a workshop with CBG and Policy Lenders (and the IESC) to review each of the comments made on draft versions of the RPF that have proven to be problematic with the intention that all outstanding differences are resolved at the workshop.
11. **The retrocession of rehabilitated land*. CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues. A procedure for managing mined land rehabilitation, with respect to community involvement and temporary or permanent relinquishment, should be developed as a matter of urgency (the IESC is expecting some progress on this during the next site visit). This procedure to take account of the good practice guidance and/or recommendations, presented in the MRCCP, relevant to mined land rehabilitation and relinquishment.
12. **Resettlement team capacity*. The size of the resettlement team is not commensurate with the resettlement issues at stake (from systemic issues to the on-going economic displacement of an additional +1000 PAPs (Mbouroré Plateau)). Moreover, several critical consultants and providers have their contract ending at the end of December 2023. CBG should anticipate now to renew the contract considering the recurrent delays in the procurement process.
13. **Resettlement monitoring and evaluation*. The absence of a validated monitoring process (included in the non-validated updated RPF), the lack of monitoring of the PAPs livelihood status and the delays in the recruitment of the Monitoring and Evaluation officer is an obstacle to the closing of the LRPs. In conjunction with the delay in LRPs implementation (compared to the land take date), the lack of monitoring is also one of the justifications for the recommendations of new interim support for PAPs (food assistance). A deadline should be provided by CBG for developing a LRP monitoring system.
14. **Delays in closure of grievances*
15. Based on CBG's documentation received for review, grievances from 2020 and 2021 are still open. Management of past grievances therefore remains an open issue which requires urgent action. Furthermore, 42 grievances received in 2022 are reported to be still open, representing 40% of the total number of collected grievances. The IESC recommends that CBG give priority to managing and monitoring progress of all past grievances and to use appropriate KPIs to assess improvements of CBG's grievance management.
16. **Sharing of environmental monitoring results with communities (before next site visit)*
17. The IESC has previously reported CBG's commitment within its management plans to disclose the results of its environmental monitoring to affected communities and that a protocol for disclosure of environmental monitoring results was scheduled for finalisation in June 2022. As of June 2023, CBG informed that a participatory monitoring procedure that includes the disclosure of results has been developed and that its implementation was ongoing. However, CBG informed the protocol for disclosure of water monitoring results was under review at the time of the site visit. The IESC urges CBG to implement the procedure and communicate on the community well water quality results in an appropriate non-technical manner as a matter of urgency.
18. It is difficult to for the IESC (and possible for CBG itself) to apprehend CBG's impacts on water resources (both groundwater and surface water) with the information currently available. In this context, the IESC recommends CBG to perform an impact assessment of

the mine activity on water resources as well as a cumulative impact study on aspect. CBG should therefore prioritise recalibration and then use of its water balance model (as described in the Water Management Plan).

As indicated above, 'Minor' and 'Moderate' significance issues are not summarised in this Executive Summary, but instead can be found in the summary tables of chapters 5 to 11. Findings made in previous reports that are not updated in the main body of this report, but instead are presented in Appendix 3 with a status update as necessary. Appendix 3 therefore provides a consolidated list of issues identified during previous monitoring visits that either remain 'Open' or have been 'Closed' or 'Superseded' since the previous report. Of note, out of 51 findings made in the December 2022 site visit report, 8 have been closed with the remainder either remaining open or superseded/updated.

1.3 Repeat findings

A number of High and Moderate findings detailed in this report repeat the findings made in previous IESC monitoring reports. The table below provides a visual summary of these repeat findings and the change in significance rating over time (High, Moderate, or Minor, referred to as H, M, and Min respectively in the table below). The summary is high level and does not capture progress being made towards resolving long lead time issues, for example, ongoing implementation/near completion of corrective actions plans. Progress towards resolution of the issues below is provided in the main body of the report. The findings in the table below were not necessarily revisited in detail during the site visit, thus the findings listed above (based on latest the site visit) do not fully align with the issues listed in the table below. For those not listed above, details can be found in preceding IESC monitoring reports and in Appendix 3 of this report.

These key findings will be revisited in subsequent monitoring cycles to track progress in the closure of findings.

Tracking of recurring high and moderate significance issues

Issue description	July 2019	July 2020	Mar 2021	Oct 2021	Mar 2022	Dec 2022	June 2023
H&S performance/culture ⁶	-	M	-	H	H	H	H
Procurement delays ⁷	-	H	H	H	H	H	M
<i>Management of Change</i> – poor implementation of MoC procedure	-	-	M	M	H	M	M
<i>Air Quality</i> – closure of ESAP#13	H	H	-	H	H	H	M
<i>MUOA Project/railway safety</i> - installation of betafencing	-	M	H	H	H	H	H
<i>Hamdallaye resettlement</i> – security of land tenure	M	M	M	M	H	H	H
Fassaly Fouthabé (school) – allocation of teachers	-	-	M	M	H	H	H

⁶ There remains room for improvements, but the change to 'Moderate' rating reflects the efforts observed by the IESC (the culture is improving and leading indicators are increasing).

⁷ Reduced to moderate because procurement delays appear to be less problematic even without CBG intervention.

Issue description	July 2019	July 2020	Mar 2021	Oct 2021	Mar 2022	Dec 2022	June 2023
Fassaly Fouthabé (cumulative impacts) on affected/displaced communities	-	-	M	H	H	H	H
Resources for resettlement implementation	-	H	M	H	H	H	H
IsoMetrix database	-	-	-	M	M	Min	Min
Environmental Monitoring Programme	-	H	H	M	M	Min	Min
Oil water separator, Kamsar	M	M	H	H	H	H	Min
Airblast overpressure	-	-	-	M	M	Min	Min
Waste management	-	-	M	M	M	M	M
Hamdallaye Resettlement Site (drainage).	-	M	M	M	M	Min	Min

Note. High and moderate issues selected in the table above are not comprehensive and were selected based on an earlier IESC monitoring report. The intention is to provide a crude visual representation of progress made on certain key items over time.

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. 007-V1), signed in January 2023.

Throughout the June 2023 site visit, CBG cooperated fully and responded to the IESC's requests in relation to its monitoring work. The IESC and its reporting is not subject to any material limitations, however, the findings expressed in this report are based primarily on information gathered at a moment in time during the site visit. The IESC focused on priority issues at the time of the site visit. Lower priority issues, which are not addressed in this report, can be considered in subsequent IESC monitoring visits.

2. 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') in Guinea.

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

The IESC's scope of work allows for two in-country monitoring visits each year during construction of the Phase 1 Expansion Project and/or during the subsequent Sangarédi to Kamsar railway upgrade project associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes the monitoring of health, safety, environmental and social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG Health, Safety, Environment, Communities and Quality (HSECQ) Department and are managed under the same E&S management system. This report provides the findings of the in-country monitoring visit undertaken in June 2023, including site inspections, meetings with CBG representatives, CBG's contractors and other stakeholders.

This report focusses on CBG's HSE&S performance against Project commitments made in E&S Management Plans, the Environmental and Social Action Plan (ESAP), loan agreements and applicable Project Standards, specifically the IFC Performance Standards on Environmental and Social Sustainability (2012) and applicable World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines.

During the in-country site visit, the IESC was able to visit CBG's facilities and conduct face-to-face meetings/interviews with stakeholders, including the affected communities, and also to inspect facilities and working areas for ground-truthing purposes. The IESC was able to hold detailed technical discussions with CBG representatives and its contractors. Such meetings were held, primarily, with CBG staff from the HSECQ department as follows:

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

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

- Maintenance Department
- Mining Department; and
- Phase 1 Expansion Project (in relation to Dryer 4)

A team of five from the IESC, accompanied by an E&S specialist from the IFC, participated in the site visit meetings and inspections 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 site visit, the IESC team was granted full access to CBG documentation and received good cooperation from the CBG HSECQ Department and other CBG departments. Members of the IESC split in order to focus on the team members' disciplines, namely: i) health and safety; ii) environment (excluding biodiversity); iii) biodiversity; iv) social (excluding resettlement); and v) resettlement. More specifically, the IESC held detailed discussions on the following topics:

- General:
 - Status of the Phase 1 and Phase 2 Expansion and MUOA Projects;
 - ASI (Aluminium Stewardship Initiative) and IMS (Integrated Management System) approach and certification audits;
 - HSECQ structure and resourcing;
 - Current short-term mine plans and proposed CBG exploration activities within the South Cogon Concession Area and North Cogon Concession Area.
- HSE:
 - Status of HSE Management Systems;
 - H&S metrics, performance and training;
 - Audit and inspection programme;
 - Implementation of Management Plans, including those relating to: Air Quality, Noise and Vibration, Waste, Hazardous Materials, Resource Use and Efficiency, Water Quality, Environmental Monitoring, Contractors; and
 - Management of Change (MoC).
- Social:
 - Community Relations and Resettlement personnel resourcing and capacity development;
 - Performance of the IsoMetrix software platform for managing social (and biodiversity) risks;
 - Community health and safety (H&S), including communicable diseases, health infrastructure, rail-related and mine roads-related H&S issues;
 - The scope and focus of stakeholder engagement;
 - Community grievance/doléance⁸ management;
 - Community Development Plan.
- Resettlement:
 - The implementation status of the Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP), including the livelihood restoration activities (PRAMS);
 - The implementation status of Livelihood Restoration activities and the status of Livelihood Restoration Plans (LRPs);
 - The update of the compensations from the start of 2023;
 - The resettlement-related grievances;
 - The update of the Resettlement Policy Framework;
 - Cumulative impacts and historic land takes;
 - Resettlement implementation capacity.
- Biodiversity:
 - Resourcing levels, organization and structure;
 - Inspection and land rehabilitation;
 - Biodiversity Action Plan (BAP) and Biodiversity Monitoring and Management Plan (BMMP); and
 - Integrated Landscape Management Plan (ILMP).

Following the site visit, a short session was held on the 20th June 2023 to review the implementation status of the ESAP items.

⁸ *Doléances* are community requests for assistance (such as improving a road, building a clinic, or providing a new well for water).

The site visit itinerary is provided in Appendix 1.

This report focuses on the findings arising from the June 2023 site visit; 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.

3. SCOPE AND STRUCTURE OF THE REPORT

3.1 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 the 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 regarding the Phase 1 and Phase 2 of the Expansion and MUOA Projects.

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

- A review of ESAP implementation;
- A review of certain HSECQ Management System documents, notably agreed management plans;
- Interviews held with key HSECQ staff within CBG;
- Interviews with CBG's contractors;
- Interviews with other CBG departments; and
- Meetings with community members affected by the MUOA Project and CBG's broader activities.
- Review of recent Borrower's E&S Compliance Certificates for Q1 2023

3.2 Project Standards

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

- Applicable laws and regulations of Guinea;
- Specific commitments made by CBG and requirements specified in the ESAP;
- IFC Performance Standards on Environmental and Social Sustainability (2012), specifically:
 - Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
 - Performance Standard 2: Labour and Working Conditions;
 - Performance Standard 3: Resource Efficiency and Pollution Prevention;
 - Performance Standard 4: Community Health, Safety and Security;
 - Performance Standard 5: Land Acquisition and Involuntary Resettlement;
 - Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; and
 - Performance Standard 8: Cultural Heritage; and
- WBG EHS Guidelines applicable to the Project.

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

3.3 Structure of the Report

Section 4 provides a very brief description of the Expansion Project status, the MUOA Project status and other CBG activities. Section 5 describes how different levels of significance are attributed to issues highlighted in the report. The report is then structured around the seven IFC Performance Standards applicable to the Project, as listed above, and supporting WBG EHS Guidelines. The key findings identified during the June 2023 site visit and the IESC's recommendations to address them are summarised in 'significance tables' for each IFC Performance Standard at the end of each section.

[Appendix 3](#) provides a status update for the consolidated list of 'open' issues identified during previous monitoring visits. The status of previously identified issues are categorised as either:

- Closed (with an explanation of the rationale for closing an issue);
- Open (either because no/insufficient 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 replaced by an updated finding. 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 international industry practice. However, due to the compliance-focused nature of this report, the broad range of aspects covered, and large amounts of review documentation made available, and also for the sake of brevity, the report is predominantly focused on areas for improvement.

4. 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 site visit in June 2023.

4.1 Status of the Expansion Project

The last remaining activity relating to the Expansion Project related to the commissioning of dryer 4. As reported previously, dryer 4 was commissioned in mid-2022 and the construction/commissioning of the Expansion Project is complete.

4.2 Status of MUOA Project

During the previous site visit (December 2022), the overall progress of the MUOA Project was reported at 68%. Progress in June 2023 was reported to be 72% complete (as of February 2023) with the same key tasks to be progressed, namely:

- Installation of permanent signalling and training - 66% complete with a scheduled end date (acceptance test) in December 2023;
- Construction of the locomotive maintenance workshop (11% complete with a scheduled end date September 2024); and
- Delivery of 7 remaining reconditioned SD40 locomotives, under the Phase 1 scope, three locomotives were delivered to Kamsar in March 2023 and the remaining four will be delivered by the end of 2023⁹ (89% complete).

Other notable developments include:

- The main track rehabilitation (over the 120 km long rails), which includes procurement of the ballast, of 17 switch machines, and of sleepers and pandrols. The contract with the contractor for the installation works was signed in January 2023 (CRCC), and a contract was signed in April 2023 with SGS for the quality control and supervision works.

The construction of thirty Technical Rooms (also referred to as 'Bungalows') were completed at the time of the visit to house signalling equipment along the railway, and 7 more were under construction at the time of the site visit (progress 78%).

⁹ 18 out of 25 locomotives ordered are already in services.

4.3 Status of South of Cogon activities

4.3.1 Current mining plan

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

Plateau	Status of LDP	Status of activity at the plateau
Ndangara et Koobi suite	Finalised	Stripping complete, all HSEC activities closed
Kagnaka haul Road	Finalised	Biodiversity assessment, baseline data collection, inventories, compensations and final draft LRP complete and measures to protect the head water springs agreed
Kagnaka Plateau	Finalised	Biodiversity assessment, baseline data collection, inventories, compensations and final draft LRP complete.
Parawi 5 and 3a	Finalised	Biodiversity assessment, baseline data collection, inventories, compensations completed.
Mbouroré Plateau	In progress	Biodiversity and monitoring assessment complete, inventories and compensations ongoing. Notification sent to the lenders.
Parawi 3b Plateau	Suspended	Remains suspended because of the speculative construction of buildings and commencement of economic activities in the affected area.

The mining of the Mbouroré plateau presents a number of environmental and social sensitivities (proximity to gallery forests and villages). Whereas the LDP is yet to be finalised, it is anticipated that exclusions and buffer zones will be required around villages and the Boullere Key Biodiversity Area (KBA).

4.4 CBG activities in the North of Cogon Concession Area

The IESC is aware of the ongoing LDP process in the North of the Cogon River.

At this stage, the field studies and inventories have been completed and the LDP delivery is pending the payment of the PAPs' compensation.

The ESIN (Environmental and Social Impact Notice) for the upcoming prospection campaigns has been initiated. Exploration activities have not yet started, pending the payment of PAP's compensation. The ESIA (required for any mining exploitation activities) will be developed with the assistance of ALCOA and Rio Tinto.

CBG HSECQ team is working closely with the North of Cogon team to ensure all activities are conducted in compliance with CBG ESMS requirements.

As reported previously, at this stage no firm decision has been taken to mine the NoCo Concession Area. In the event CBG decides to seek international financing to mine NoCo, the impacts will be subject to a separate independent analysis; as such NoCo activities are largely outside of the IESC's current scope and the IESC has adopted a watching brief in respect to NoCo activities.

4.5 CAO Process

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

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

5. SIGNIFICANCE ASSESSMENT

5.1 Review findings

A summary of the review findings is presented in a significance table at the end of each PS Section. In the tables each finding is presented as an issue, and the following information is provided (see Table 5-1 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).

5.2 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.

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 5-1: Example of the Summary Table Format

ID	Aspect	Issue Description	Phase ¹⁰	IESC Recommendations	Sign
00	Storm water run-off – monitoring	The ESAP requires Company X 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	Company X shall Expedite procurement of monitoring equipment with the support of senior management.	Moderate

¹⁰ Phases can include construction; operations; decommissioning; or any combination of these phases.

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

6.1 HSECQ Resources

This section provides an update on HSECQ resources, including a discussion around senior HSECQ positions and the CR and Resettlement team.

6.1.1 Senior HSECQ Positions

The IESC has reported the status of HSECQ resourcing in previous IESC monitoring reports. CBG's resourcing as of June 2023 is summarised below along with key findings/ recommendations.

- Key leadership positions for Community Relations and Biodiversity are filled, however the Environmental Monitoring Team Leader role is currently vacant since March 2023, and CBG has not found a suitable profile yet (CBG was performing profiles' selection and interviews at the time of the site visit).
- The Resettlement Manager's post has been vacant since October 2021. The recruitment process has resumed at the end of last year after a selected candidate declined the offer and recently identified candidates were about to start the interviews stage (as of June 2023). In the interim, the position is being fulfilled by the CR Manager with support from an experienced external resettlement specialist. As noted in previous IESC reports, the resettlement specialist is not a CBG employee and therefore lacks authority within the Company. IN the IESC opinion it is unrealistic for the CR Manager to cover both the CR Manager and Resettlement Manager roles for the extended period that has occurred. The IESC further notes that renewal of the external Resettlement Specialist's contract (ending December 2022) took five months. This period of absence, coupled with lack of a CBG employed Resettlement Manager, is likely to have resulted in significant delays in the management of resettlement issues.
- The HSEC Director¹¹ role continues to be fulfilled by the Deputy HSECQ Director (the Acting HSECQ Director); and
- Ongoing support from a number of consultancies (as reported previously) continues.

The IESC previously reported on the involvement of the Operations Director on HSECQ matters and reiterates its comment. The Operations Director was present throughout the recent site visit and continues to be closely involved with HSECQ matters.

6.1.2 Overall HSEQ Organizational Structure

The figure below shows the overall HSEC organizational structure. The structure is identical to that presented in the IESC's previous report with the exception that many of the earlier vacant post have been filled (see below).

¹¹ HSECQ Director left his post in early 2021.

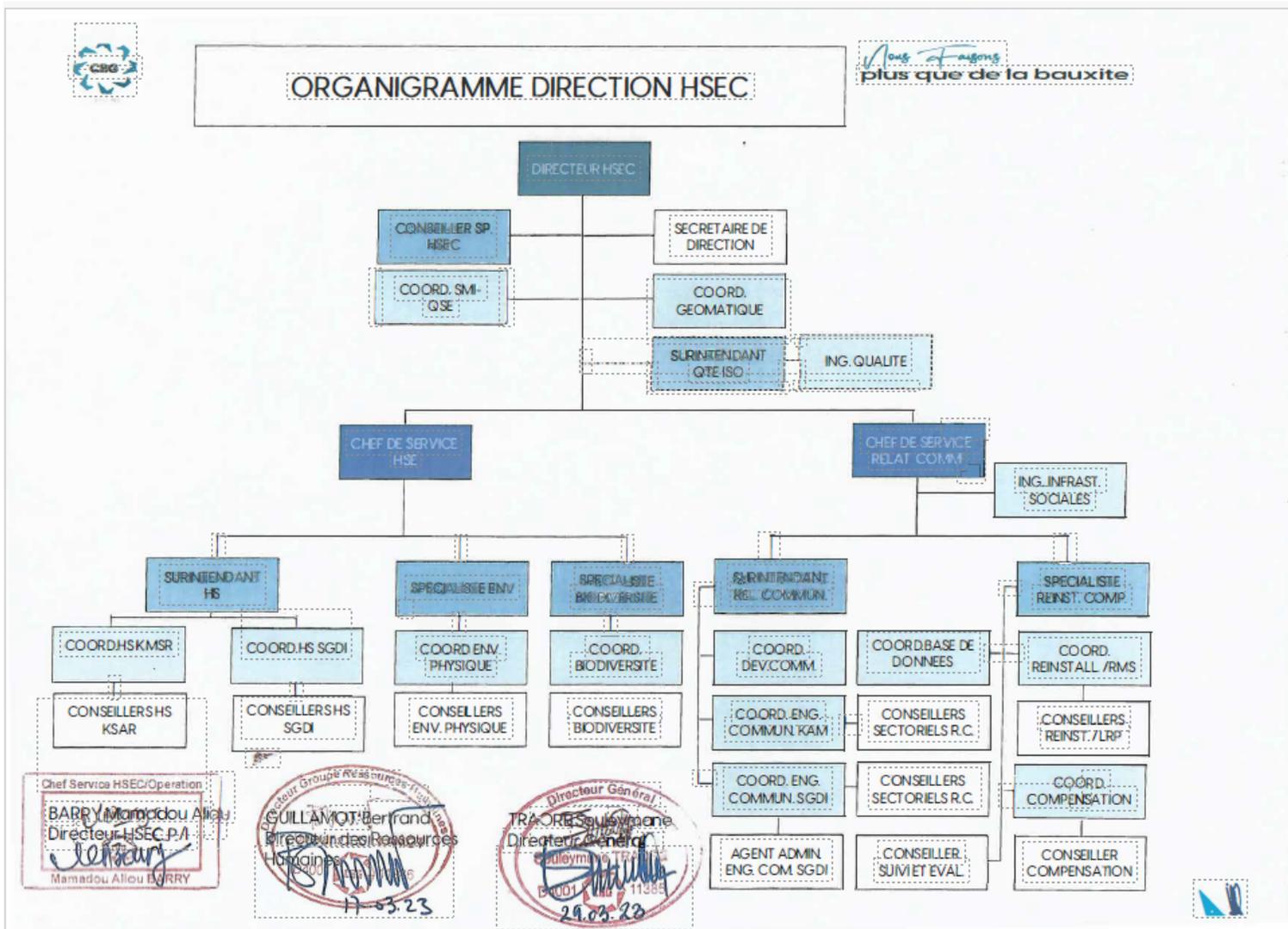


Figure 6-1: HSEC Organigram

6.1.3 Environmental monitoring team

In 2022, CBG has recruited 5 new people to strengthen the environmental monitoring team capacity in the view of the amount of monitoring required for the site’s activities. 3 are based in Sangarédi and 2 in Kamsar. These new recruits helped to increase the number of samples taken, hence reducing the number of sample omissions from 29% in December 2022 to 17% in May 2023.

As mentioned earlier, Environmental Monitoring Team Leader role is currently vacant since March 2023.

The organigram of the environmental monitoring team as presented during the June 2023 is shown below.

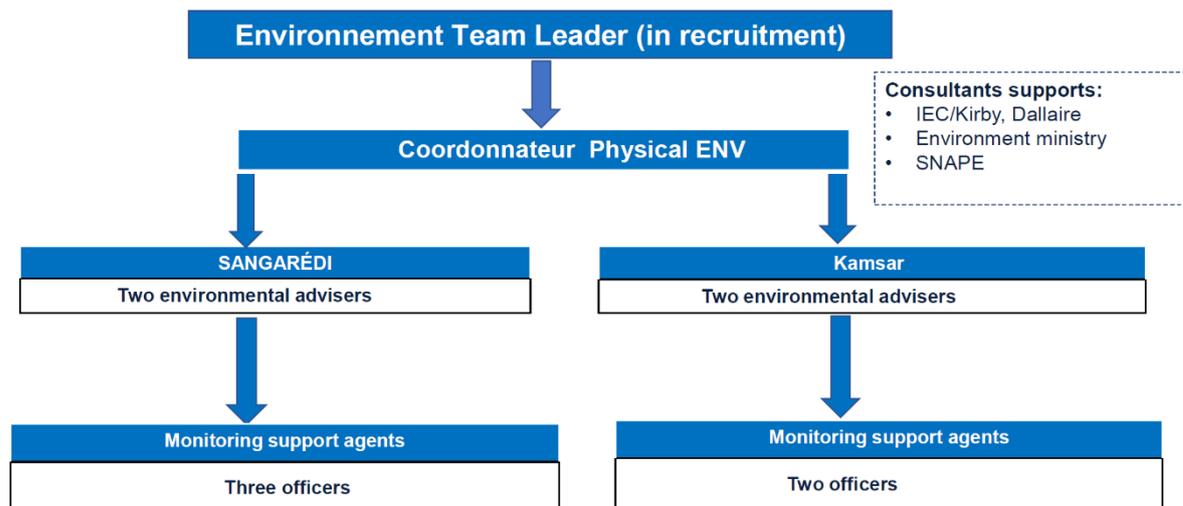


Figure 6-2: Environmental Monitoring Team Organigram

6.1.4 Health and Safety team

As mentioned earlier, the role of HSEC Director is still to be filled. The head of HSE department currently the Acting HSEC Director. There is also a Special H&S Advisor who reports directly to the Acting HSEC Director.

H&S superintendent is the Team Leader of two H&S Coordinators (1 in Sangarédi and 1 in Kamsar). The H&S teams have been in place for several years, with advisors based in Sangarédi and Kamsar. In addition, 8 HSE advisors are currently being recruited to strengthen the teams on operational division.

6.1.5 Biodiversity Team

At the time of the June 2023 site visit, the biodiversity team comprised the following seven positions:

- Biodiversity Manager;
- Botanical specialist;
- Faunal specialist;
- Rehabilitation specialist; and
- Inspection specialists (1 lead and 2 junior).

6.1.6 Community Relation (CR) Team

At the time of the June 2023 site visit, 3 new people had officially joined the CR team:

- 1 Community Engagement Coordinator in Sangarédi;
- 1 Community Relations and Litigation Advisor in Kamsar;
- Official internal transfer of 1 staff member from the Mining Department who was already collaborating with the CR team since March 2021, in the area of blasting related community awareness and consultation activities.

The CR team (excluding resettlement) was therefore composed of 12 people, namely:

- 1 head of community relations based in Kamsar
- 1 community relations superintendent (RC) in Kamsar
- 1 community development coordinator (RC) in Kamsar
- 1 community engagement coordinator (RC) in Kamsar
- 1 community engagement coordinator (RC) in Sangaredi
- 6 community relations and litigation advisors (RC): 2 in Kamsar and 4 in Sangarédi
- 1 community engagement administrative officer (RC) based in Sangarédi
- 1 social infrastructure monitoring engineer based Sangaredi (working with the resettlement and CR teams)

In addition, the CR team has also appointed 2 community relations officers in Sangarédi through temporary employment agencies to support the CR activities. The IESC understood from the discussion with CBG and material shared for review that the hiring of temporary staff is planned to cover either long-term training of team members, if required, or resourcing needs while waiting for recruitment of permanent staff. In fact, to strengthen the team, CBG is planning to hire 4 additional Community Relations (CR) advisors in Sangarédi; the IESC understands that the recruitment process is currently being finalized. Likewise, the appointment of the Database Coordinator (reporting to the Resettlement specialist but shared resources with the CR team) was also reportedly ongoing with last steps of the recruitment process (including medical checks) underway; CBG informed that the appointment of this resource was planned to occur by July 2023.

Importantly, CBG has also informed of the intention to dedicate 3 of the new planned personnel exclusively to grievance follow-ups on the ground. The IESC also understood that the CR team is planning to have 1 community relations advisor, based in Sangarédi, dedicated to the North of Cogon activities, with frequent travel to the area depending on the activity.

Despite the recruitment of several HSECQ staff members, the recruitment levels discussed with the IESC in December 2022 (5 new resources planned to be appointed overall between coordinators and advisors in Sangarédi and Kamsar) have not been achieved. The recruitment of the Database Coordinator in charge of the IsoMetrix database (additional resource already planned in December 2022) is also pending. Considering the delays in the implementation Recruitment plan the IESC strongly recommends that recruitment be accelerated to achieve appropriate organizational capacity.

Equipment Resourcing and Training

Issues with the software platform IsoMetrix for social, resettlement, environmental and biodiversity data management have been reportedly resolved through the purchase of a new server. Data migration has been finalized and preliminary social data have been entered into the system. During the June 2023 monitoring visit, the IESC was able to observe some examples of social data available on IsoMetrix, particularly in relation to stakeholder engagement and the community grievance mechanism. In addition, an example of Cultural Heritage asset recorded in the system – as part of the Environment section - was also observed.

The IESC confirms that the system works well and would allow CBG to monitor E&S data in a more efficient way. The following observations are however made:

- Social data pertaining to 2023 are yet to be uploaded onto the IsoMetrix platform. CBG reports a progressive use of IsoMetrix, with the upload of data on community meetings and grievances to be completed by Q2-2023. During the June 2023 site visit, CBG acknowledged delays and has committed to have all data uploaded as a matter of priority. The IESC agrees with CBG plans and, by the next monitoring visit, expects to see all 2023 social data (available at that time) recorded onto the system.
- As IsoMetrix allows CBG to record and monitor workflows, KPIs, and timelines (e.g. date of data recording, date of grievance resolution), it is important that CBG ensures that IsoMetrix becomes a tool to monitor appropriate implementation of relevant ESMPs (e.g. SEP, Grievance Management Plan) and workflow proposed therein.
- A comprehensive plan to ensure that Cultural Heritage and biodiversity data are also into the system is to be developed and implemented in 2023. Based on the material shared for review, CBG plans to have cultural heritage data update by Q3-2023. The IESC agrees with CBG plans and, by the next monitoring visit, expects to see all 2023 social data recorded onto the system.
- The appointment of the Database Coordinator to be prioritized to ensure that IsoMetrix runs smoothly, cover all the different aspects (i.e. environment, including cultural heritage, and biodiversity) and that templates/modules are consistent with the CR Team's needs and relevant ESMPs, including reporting of KPIs.

The contract with ACORN has been renewed until December 2023 for the assistance on the revision of management plans, monitoring and evaluation of these plans, ESAP deliverables and support to the CAO mediation process. In addition, CBG's CR team is continuing to engage with third-parties on different social topics, such as malaria and HIV/AIDS programmes, and on Gender-Based Violence and Sexual Harassment (GBV-SH). More details are provided in the ensuing sections.

Training (CR Team)

At the time of the June 2023 site visit, no training planned in 2023 had been rolled out. The IESC was informed that training is expected to start in the upcoming months is still related to:

- Social Management for Participative and Sustainable Development in Mining Regions at the Centre of Social Excellence (CSE)- The IESC understands that one person from the CR team will start the training this year which will take place in Boke (4 months) and within the Boke region including Sangarédi (6 months) (and not, partly, in Yaoundé).
- Land Acquisition, Resettlement and Social Sustainability in Groningen, The Netherlands. The IESC understood that 1 Resettlement team representative will join the 2-week resettlement training organized by the University of Groningen.
- Training/ provided through the IFC Advisory services.

CBG informed that training as foreseen in the 3-year agreement signed between CBG and the IFC Advisory is yet to be rolled out. Nonetheless, during the June 2023 site visit, the IESC understood that a training on Gender Based Violence and Sexual Harassment (GBVSH) has been now included in the training plan, according to IESC's latest recommendation on the matter.

More in general, CBG confirmed that the IFC Advisory Services is going to support CBG on the following: Perception survey, Stakeholder engagement, Community investment; Local content (capacity building for local VSEs and SMEs to increase their competitiveness); and building community capacity and knowledge about sustainable mining projects and how to engage with CBG.

The IESC understands that the IFC Advisory has been working on the preparation of the foreseen studies (as per signed agreement) on local content (i.e. evaluation of CBG's community investments and past community economic projects) and on the perception survey (i.e. an assessment of stakeholders' perceptions of CBG projects to understand their concerns and shortcomings, with a view to advising CBG on their implementation through training, coaching and management tools). These studies have been shared for review.

With respect to training provision to the wider CBG team, during the June 2023 site visit, the IESC understood that, to respond to one of the IESC's latest recommendations, some IFC advisory trainings will target colleagues from other departments on key E&S topics.

Finally, in the context of the ASI certificate, CBG informed about the organization of one training session on Human Rights, held on April 4, 2023, and targeting CBG's personnel at the mine; and one training session on Security and Human Rights, held on April 5, 2023, targeting responsible departments, private security companies contracted by CBG and public security providers. From the material shared for review, the IESC understands that the former training targeted about a hundred CBG managers. The training in Human Rights was provided by members of the Ecological and Social Sustainable Development Committee of Alcoa and Rio Tinto and was structured as follows:

- Training of the Extended Management Committee in Kamsar (09/29/2022)
- Training of Supervisory Staff in Sangarédi (06/04/2023)

The training focused on the UN Guiding Principles on Business and Human Rights and corporate responsibilities, particularly in the aluminium industry, as well as the importance of the Human Rights due diligence process. A training targeting all employees in the Human Rights Policy at CBG was also provided through the Divisional Human Resources Advisors.

The latter training on security and human rights targeted the Department of Prevention and Emergency Measures as well as representation of private security companies in contracts with CBG and public security forces. This training focused more on the application of the UN Voluntary Principles on Security and Human Rights, particularly covering:

- Management of the relationship with the private security forces
- Collaboration with public security forces.
- Human rights security risk assessment.

6.1.7 Resettlement Team

CBG announced during the December 2022 visit the final stage of the recruitment of 11 additional staff members for the Social teams, including four for the resettlement team and two shared resources for the Community Relations and Resettlement teams. The following table present the status of these recruitments:

Position	Status of recruitment	Comments
Two LRP advisors	Candidate identification stage	Recruitment for the 2 identified candidates in December failed: one declared as unfit for work during the medical examination and the other one accepted an alternative offer
One compensation advisor	Final stage (medical examination and contract elaboration)	The identified staff is currently a BCEIP temporary worker in the resettlement team which will become a permanent CBG employee
One Monitoring & Evaluation advisor	Final stage (medical examination and contract elaboration)	
One Social Infrastructure engineer (shared resource)	Completed	The position has been appointed
One GIS and database coordinator (shared resource)	Final stage (medical examination and contract elaboration)	

CBG indicated that CBG Sustainable Committee has recommended the recruitment of two Community Liaison Officers (CLO), one in Hamdallaye and one in Fassaly Fouthabé and that job description were being drafted.

In the organigram provided in the December 2022 and again June 2023 visit, the Head of Community Relations remains in charge of the Resettlement team, with the support of the Resettlement Specialist. As noted in the March 2022 IESC Report, the "specialist" title is ambiguous, especially in respect of hierarchical responsibility. In December 2022, CBG efforts to find a permanent Resettlement Manager had failed and the current resettlement specialist was still an interim position with a contractual anniversary December 2022. His contract was only renewed in May 2023 (and up to December 2023) which means a 5-month period without the oversight of the resettlement specialist. As regards to the search of the permanent position, CBG indicated that two new candidates have been identified but not yet interviewed.

The following contractors are supporting the CBG Resettlement team on a regular basis:

- SAMEC for inventories and surveys (contract up to December 2023)
- CEMED for LRP development (one-year contract not yet signed – replacement of INSUCO)
- SIGMA for the geo-referencing of data (contract up to December 2023)
- Phénix for LRP implementation (contract for 3 years)

The following training plan is scheduled for the resettlement team in 2023:

- The resettlement and livelihood restoration Coordinator will attend the 2-week training on resettlement organized by the University of Gröningen in partnership with the World Bank and Intersocial in Denmark in September 2023.

In view of the status of the recruitments, the coming December 2023 deadline for a number of contracts and CBG slow recruitment process, the IESC reiterate the recommendation to:

- Staff the resettlement team with sufficient level of resources to manage current needs from systemic issues to the on-going economic displacement of an additional +1000 PAPs (Mbouroré Plateau)
- Initiate the procurement process with immediate effect for the contracts ending in December 2023.

6.2 Stakeholder engagement

6.2.1 Implementation of the stakeholder actions

The status of the SEP action plan reports an overall 70% progress, compared to 62% recorded in the end of 2022. Based on the information provided by CBG, the action plan progress is mainly due to the following:

- The latest comments received from the lenders have been integrated and sent back to the lenders.
- The 2023 operational action plan for the mine, rail and port follows the SEP 2022-2025.

Monthly monitoring is carried out at the General Management level, along with the various action plans to check compliance with the IFC performance standards.

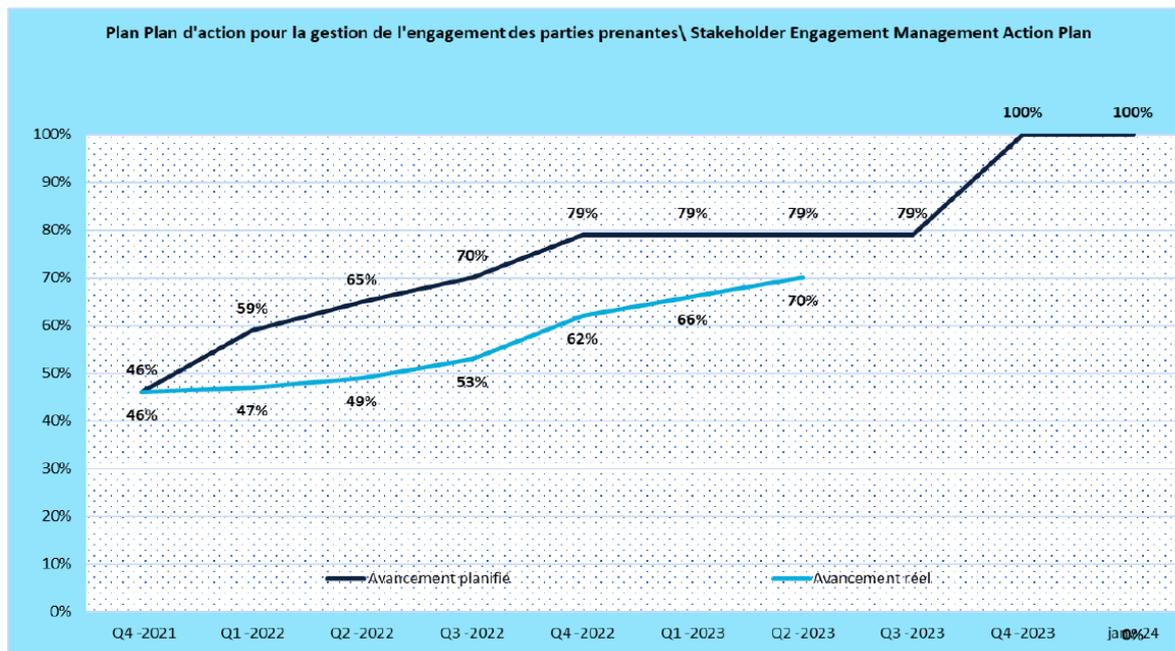


Figure 6-3: SEP Action Plan Status as of 30 April 2023

The IESC did not have a thorough discussion on the SEP Action plan progress, however through the discussions held onsite, the IESC understood that:

- SEP implementation records a delay mainly due to the resource constraints of engagement activities pertaining to the LRP - the IESC understood that engagement activities through the LRPs are requiring too much team effort for the team to have enough time for regular SEP activities, although this matter was not further investigated with the CR team.
- 1 Community Relations Advisors will focus on engagement in the North of Cogon concession to inform stakeholders about consultant visits in relation to the undertaking of feasibility studies and socio-environmental impact studies in the area.
- Progress has been made in relation to the provision of feedback on monitoring results. In particular the IESC understands that disclosure of environmental monitoring results is currently underway in relation to blasting, noise and vibration and dust, with results disclosed to 13 villages through the CAO mediation; in addition, a communication procedure (indicated by CBG as a participatory monitoring procedure in the shared presentation) is under finalization through an NGO’s support to ensure disclosure to the broader communities. The IESC will review such procedure once available; in the meantime, it is understood that the procedure will cover the whole process of collection and disclosure of results. Importantly, monitoring of water monitoring results remains pending also in the disclosure of environmental data, despite data availability. All in all, the IESC recommends that the disclosure process of all available environmental monitoring results is communicated to affected communities; and that finalization and implementation of the communication procedure occurs as a matter of urgency. Disclosure of environmental data should be decoupled from the CAO process to ensure there is no further delay in the sharing of water quality data.
- One set of minutes has been shared dated June 19, 2023 of a community meeting held at the Ile Taigbé to discuss, inter alia, participatory environmental monitoring. In particular the minutes describe CBG’s request for [community] manpower to assist in equipment surveillance during the undertaking of air quality and noise monitoring equipment. The IESC understands this is part of the participatory monitoring CBG plans to initiate, though it is not clear how many engagement meetings on this topic have been organized throughout the project area. The initiation of a participatory environmental monitoring has been included by CBG among the areas of improvement (axes d’amélioration) of the SEP. More details on this matter will be collected in the next monitoring visit.

The IESC confirms that the SEP has been implemented with ongoing engagement organized and carried out regularly by CBG’s CR team. Based on the information presented by the CBG, most of the engagement activities continue to occur at the mine (108 meetings, 84%), then at the port (11 meetings, 11,9%) and at the rail (9 meetings, 7%), covering CBG’s operations (68%), resettlement (26%) and finally the Multi-User Project (6%).

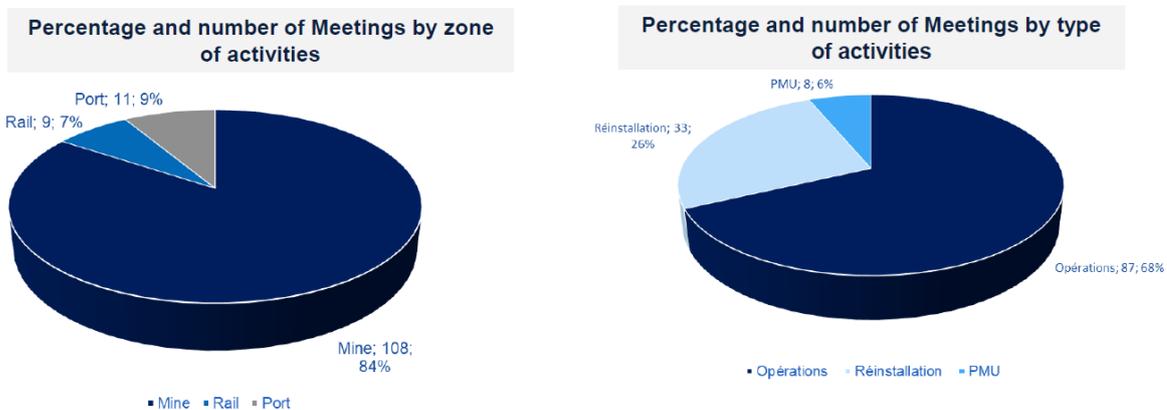


Figure 6-4: Meetings by zone and type of activity as of 30 April 2023

In addition to community meetings, CBG has conducted 6 meetings with municipal and administrative authorities, 4 meetings with national Non-Governmental organizations (NGOs) – ACDI/VOCA, Action Mines Guinée, Vision Sans Frontière, Fraternité Médical Guinée. No consultation forums (cadre de concertation) have been organized in the first 6 months of 2023 which are still planned to be undertaken in 2023.

In the material shared for review, CBG highlights that at the mine they have started engaging communities to discuss securing of sites rehabilitated by CBG and establishment of community forests; that along the railway and at the port, CBG has organized engagement activities with communal and sub-prefectural authorities to raise awareness on the grievance management mechanism; in addition, at the port CBG mentioned as salient facts the disclosure of the Emergency procedure to communal and sub-prefectural authorities; meetings organized to address concerns related to electricity in Kamsar.

Based on the material shared for review, the IESC understands that the main concerns expressed by communities during the engagement activities are the following:

Mine: Employment of local labour; Capacity building for young people; Reprofilling of community access roads; Improved access to drinking water (borehole); Resumption of the PA-AGR (Projet d'Appui aux Activités Generating Activities).

Rail: Improved access to drinking water (borehole); Installation of wire fencing along the railway. Railway; Community access roads; Employment of local labour.

Port: Demand for basic social infrastructure; Community access roads; Access to drinking water; Electricity supply.

As concerns stakeholder engagement at the port, as mentioned in the December 2022, the IESC understands that provisions have been put in place to progress with the engagement at the port néné (community meetings including disclosure of the grievance mechanism procedure, environmental monitoring, and assistance in case of distress). An action plan has been prepared to hold the meetings in the islands that during the June 2023 visit had not been yet organized. From discussions held onsite, the IESC understood that an action plan has been put in place, considering the tides, to start engagement. Engagement at the Islands is still required.

CBG has continued conducting focus groups discussions with women and the youth. As of April 30, 2023, amongst the participants, 26% of women and 34% of young people have taken part in focus groups discussions / community engagement. Total number of participants is 2691, according to CBG's data. Participation of women and youth have increased from January to April 2023.

The IESC understands that NGO "Assistance Justice aux Droits des Enfants et Femmes)" (ADJEF) supported awareness raising on gender-based violence as part of Women's Right Day. Based on the information provided by CBG, the IESC understands that AJDEF's support has been initially sought to sensitize CBG's female personnel on gender issues. In particular, a panel discussion was organized as part of the celebration of the International Women's Rights Day (March 08, 2023) under the theme "innovation and technological change and education in the digital age to achieve gender equality between men and women". Based on the review of the Terms of Reference, specific objectives of the event were to mobilize female CBG employees; to develop capacity-building for women and girls on the benefits of new information and communication technology; and to encourage the effective application of laws and provisions relating to the protection of women.

The event, which reportedly was successful and productive in term of experience and knowledge exchange has seen the participation of approximately 150 women, all CBG workforce. Among ADJEF's recommendations as included in the follow-up report of the event (ref. Celebration of International Women's Rights Day with the CBG in collaboration with the NGO AJDEF – activity report), the following is found:

- Institute rotating festivals at the various CBG sites, namely Kamsar and Sangarédi.
- Devote the day of March 08 to series of activities such as, training, recreational activities for example soccer and banquets dedicated to women workers.
- Facilitate networking for women who aspire to remote training for career development.
- Encourage women to report abuse and violence received by managers through specific reporting channels such as suggestion boxes, grievance management procedure, to avoid keeping victims in harmful silence.

The IESC deems the organization of such event highly positive as it was able to engage with CBG's female workers that are most likely local communities' members. It is therefore considered an initial engagement initiative to discuss GBV-SH issues. It is however recommended that CBG develop a more structured plan and:

- continue organizing such events, also considering AJDEF's above-mentioned recommendations;
- start considering the involvement of male workforce in these initiatives or other initiatives that might be organized jointly with AJDEF (or any other NGOs or entity relevant to the purpose);
- while awaiting the provision of IFC Advisory's training on GBV-SH, collaborate with AJDEF (or any other NGOs or entity relevant to the purpose) to conduct gender-sensitive consultations to investigate possible presence of GBV-SH issues.

On June 1, 2023, CBG has organized the first engagement meeting with one local association of people with reduced mobility. The meeting aimed to introduce CBG's grievance mechanism procedures and community development plan and has been positively welcomed by the association as indicated in the minute of meeting shared for review. The IESC appreciates CBG's first engagement with People with Disability (PwD) and recommends that a more regular engagement be structured and that discussions over the betafencing be held to verify PwDs' needs, particularly in terms of crossing points, before the installation of the betafences in Kamsar (also refer to Section 9.3).

Finally, as part of the IFC Advisory services, a perception study is ongoing as part of the broader goal to support CBG in reinforcing CBG's community engagement capacity and approaches. An intermediary report has been shared for review ahead of a draft final report. The IESC understands the draft report is under finalization although it was supposed to be delivered in March 2023. During the 2023 site visit the IESC did not discuss the tentative planning and reasons for delays. CBG has however included the realisation of the perception study in the section "areas for improvement" pertaining to the SEP. More information of the results of the perception study will be collected in the next site visit.

6.3 Grievance Management

6.3.1 Updated Grievance Management Procedure

A revised Grievance Management Mechanism (GMM) Procedure, is currently undergoing iterative revision/review by the IESC and Lenders. Residual comments are minor in nature and finalisation of the new GMM is expected in Q3, 2023.

6.3.2 Grievance Management Status

Based on the material received for review, CBG has addressed the majority of the IESC's observations which were raised during the December 2022 site visit. In particular, CBG reports to have undertaken the following:

- A sub-category “Other” has been added to the environment category to allow categorisation of complaints related to other environmental aspects such as biodiversity;
- The grievance register now contains a column to capture grievance resolution timeframes (complaint processing time in days) and thus delays in the resolution of grievances;
- Since January 2023, all community concerns are recorded in the registers of grievances or doléances;
- The revised GMM now contains reference to the possibility to submit anonymous grievances;
- The complaints register is systematically updated and letters are sent to respond to requests or inadmissible requests. Follow-up feedback is provided for admissible requests;
- Complaints about livestock accidents are systematically recorded.

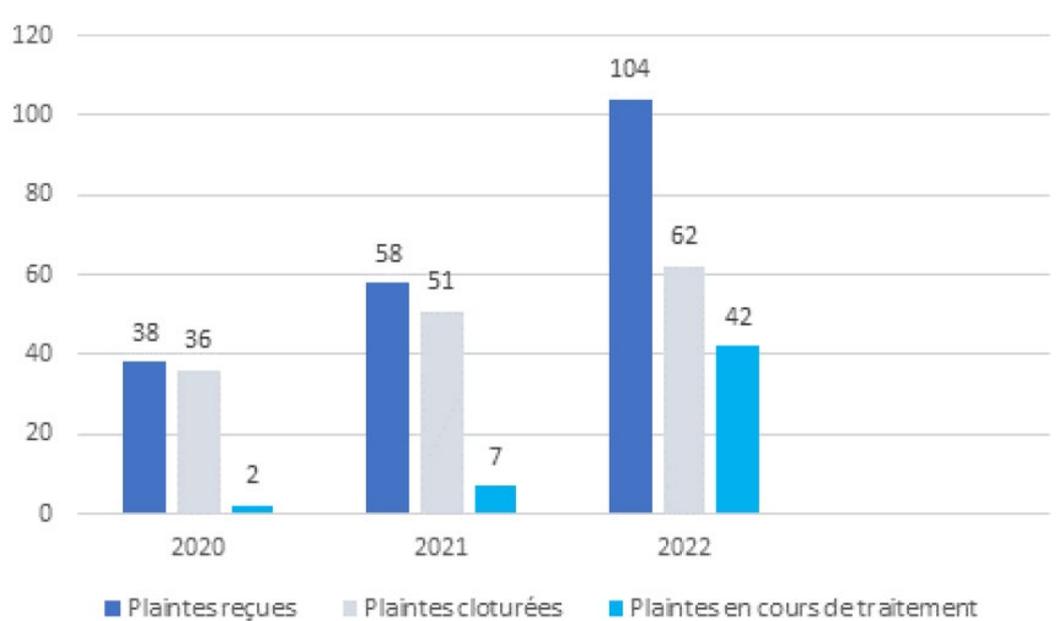


Figure 6-5: Grievance status 2020-2022 (dark blue: received complaints, grey: closed complaints, light blue: complaints currently addressed)

CBG is also working on revising / finalizing KPIs pertaining to grievance management; in addition, a risk analysis for the complaints related to taking possession of land during stripping activities (previously reported as source of a large number of complaints) has been presented to the HSECQ committee. HSECQ Committee and awareness campaign and reminders have been already delivered to mine operators. Specifically, according to the material shared for review, the HSECQ committee meeting had been rescheduled for April 2023 in response to IESC’s recommendation to “strengthen the capacity of the monthly HSECQ committee meeting to act to ensure that there are no institutional “obstacles” to rapid action in terms of: i) recognition of the legitimacy of the complaints; then ii) putting in place actions to close them as quickly as possible”. Nonetheless, no updates have been received as follow-up. These actions are however considered by CBG to be “in progress” and not closed.

Based on CBG’s documentation received for review, 9 grievances from 2020 and 2021 are still open (see earlier IESC reports). Figure 6-6 reports status of grievances from 2020 to 2022, divided in received grievances (in blue); closed grievances (in grey) and open grievances (in turquoise). Overall, CBG needs to address 51 open grievances, considering those still open since 2020.

Management of past grievances therefore remains an open issue which requires urgent action. Furthermore, 42 grievances received in 2022 are reported to be still open, representing 40% of the total number of collected grievances. The IESC recommends that CBG give priority to managing

and monitoring progress of all past grievances and to use appropriate KPIs to assess improvements of CBG’s grievance management.

57 community grievances had been registered in 2023 through to April 30, 2023, of which 20 had been closed and 37 were being processed. Out all the grievances received 42 (74%) come from the mine; 14 (24%) from the rail; and 1 (2%) from the port. The majority of the grievances received (29, 50%) pertains to resettlement/land occupation, following by security issues (12, 21%), socio-economic matters (11, 19%); and environment (6, 10%).

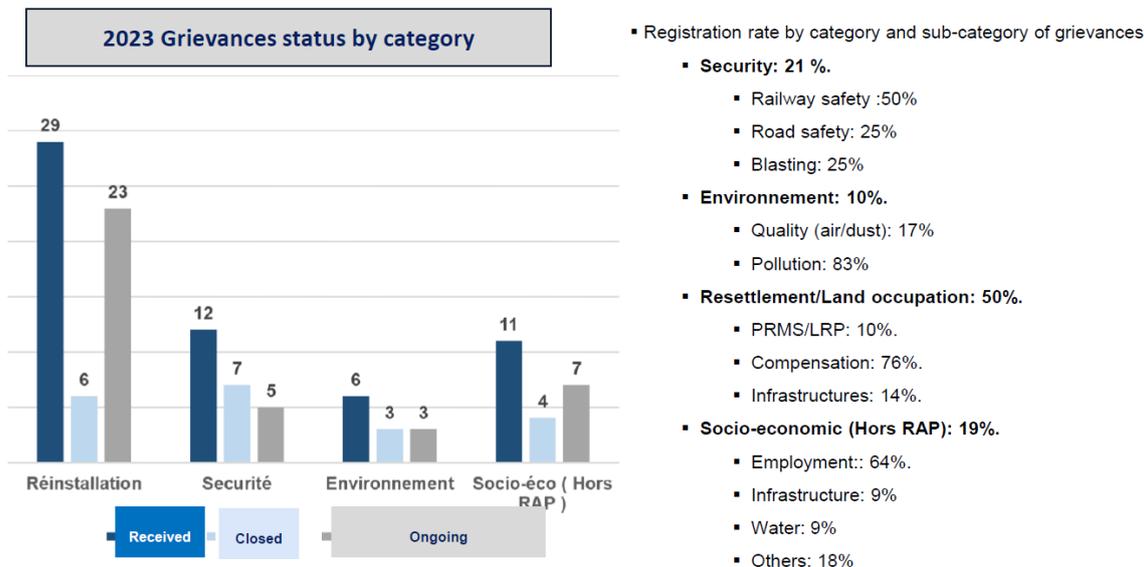


Figure 6-6: 2023 Grievance status by category

Apart from the resettlement related grievances (discussed in Section 10.6), CBG’s risk analysis as included in the material shared for review and pertaining to grievance management, notes the following for the remaining matters:

- Environment (water, pollution): Lower number of grievances but the impact concerns several villages/multiple stakeholders (i.e. Fassaly Foutabhè, Fassaly Belendère).
- Safe (Blasting and Rail Safety): Reduced grievances related to blasting due to improved process. While the drop in grievances related to blasting is noted, accidents involving stray animals remain a significant concern.
- Socio-economic (excluding resettlement): Lower number of grievances, mainly relating to electricity and employment issues, affecting operations.

Based on the review of the Q1-2023 grievance and community requests register, the IESC confirms the results of the above-mentioned risk-analysis of community complaints. In addition, the following is noted:

- Out of 6 grievances related to employment (under the socio-economic category), 3 concern observations made on local companies not recruiting local people; and 3 are related to working conditions in terms of e.g. payment delays, no provision of PPE, or excessive workload (and no breaks). Most of these grievances are reported to be closed; however, 2 remains open with limited or no information on the progress made since March 2023. Better supervision of working conditions and local employment among the local subcontractors should be ensured to reduce the number of these type of grievances (see Chapter 7 on PS2).

- Among all the security related grievances, 3 are related to accidents of stray animals crossing the railway, with one being still open since March 2023. During the 2023 site visit, CBG informed the IESC that no compensation is required according to Guinean regulation and, therefore, CBG is currently rejecting these types of grievances. While the IESC appreciates the explanation provided by CBG, it is however unclear why one of these grievances still remains open since March 2023 (no comments provided in the register to further understand its status). In addition, the IESC encourages CBG to continue keeping records of, investigate livestock accidents and assess the need for initiation of a multi-user fund (or an alternative solution) to be used as compensation measure as alternative approach to the current management of these grievances (see new findings in Section 9).

More generally, by reviewing the grievance register and through discussions held on site in June 2023, the IESC also recommends the following areas for improvement:

- The IESC observed presence of open grievances recorded in early 2022 still open with no written updates provided. That being the case, the register should provide more details on the progress made on each grievance. Through the discussion held onsite, the IESC acknowledges that the CR team is well aware of each of the discussed grievances and can provide immediate updates upon request. While it is appreciated that the register remains a lean document, an update on the grievance remains necessary to better inform on the additional steps taken. Likewise, when including information on the letters sent to the complainants¹², it would be important to summarize content of the letter, particularly in terms of acceptance or rejection of the grievance. All in all, provision of more details to better clarify closure or progress made is required within the Grievance register.
- The IESC noted that a few grievances managed through the CAO mediation were recorded as closed; a 2020 open grievance now managed through the mediation was recorded as closed, whereas these grievances remain open albeit managed through a different process. In addition, it is not clear which grievances are currently managed by the CAO mediation. The IESC understands that all grievances managed through the CAO are not under CBG's complete control. While these grievances are still open, the IESC recommends that an additional information be added to inform on the presence of the CAO mediation and that such information be reported as part of the grievance monitoring so to better inform on which open grievances are in fact under CBG direct management. Therefore, the IESC recommends that CBG standardize classification of grievances managed through the CAO mediation, and more in general identify those grievances still open though not under CBG's complete control.

Finally, among the areas for improvements, CBG indicates actions to increase communities' understanding and use of the grievance mechanism procedures, with picture boxes / posters and by displaying contacts of the CR team; and through improving CBG's feedback on communities' requests and grievances during the community meetings. In the meantime, CBG reports that 49 grievance mechanism awareness-raising meetings were conducted between January and April 2023 on this subject.

¹² The following standard sentence is found in the comment column "After analyzing the complaint, a reply letter was sent to the complainant."



Figure 6-7: CR team contacts (stickers)

6.3.3 Community Requests for Assistance (*Doléances*)

Available data indicate that 34 community requests for assistance were received in 2023 out of which 8 are already reported to be closed. Of all the community requests for assistance the majority comes from the mine (24), and the remaining are equally distributed between the port (5) and the railway (5).

Based on the material shared for review, it is understood that:

- 38% of requests are related to basic social infrastructures (opening and maintenance of community roads and renovation of places of worship).
- 38% of requests are related to impact-related issues (rail safety, PRAMS or AGR, local employment, compensation and training).
- 18% of requests are related to services (electricity, water, fire brigade and sanitation).
- 6% of requests are related to financial and material support (purchase of furniture and equipment, financing of events).

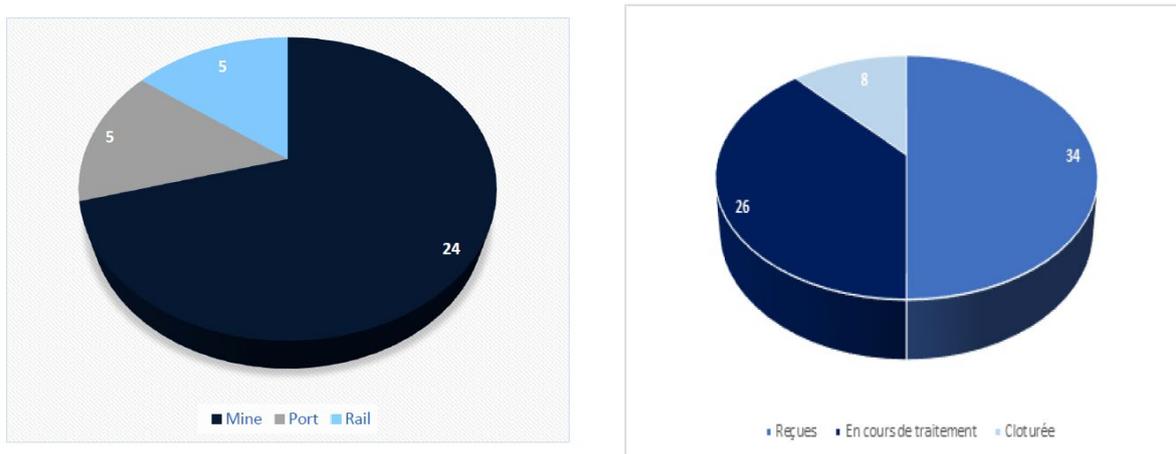


Figure 6-8: Status of Community Requests for Assistance in 2023

CBG has also provided information on the status of the communities’ requests for assistance between 2020 and 2022 (figure below), with data relative to closed requests (in blue), in progress requests, (in turquoise), requests whose implementation has not yet started (in grey); and to requests which have been turned into grievances (in light blue). The Q1 2023 Borrower E&S Certificate also informs that 8 community assistance requests from 2021 and 2022 have been closed in the first quarter of 2023.

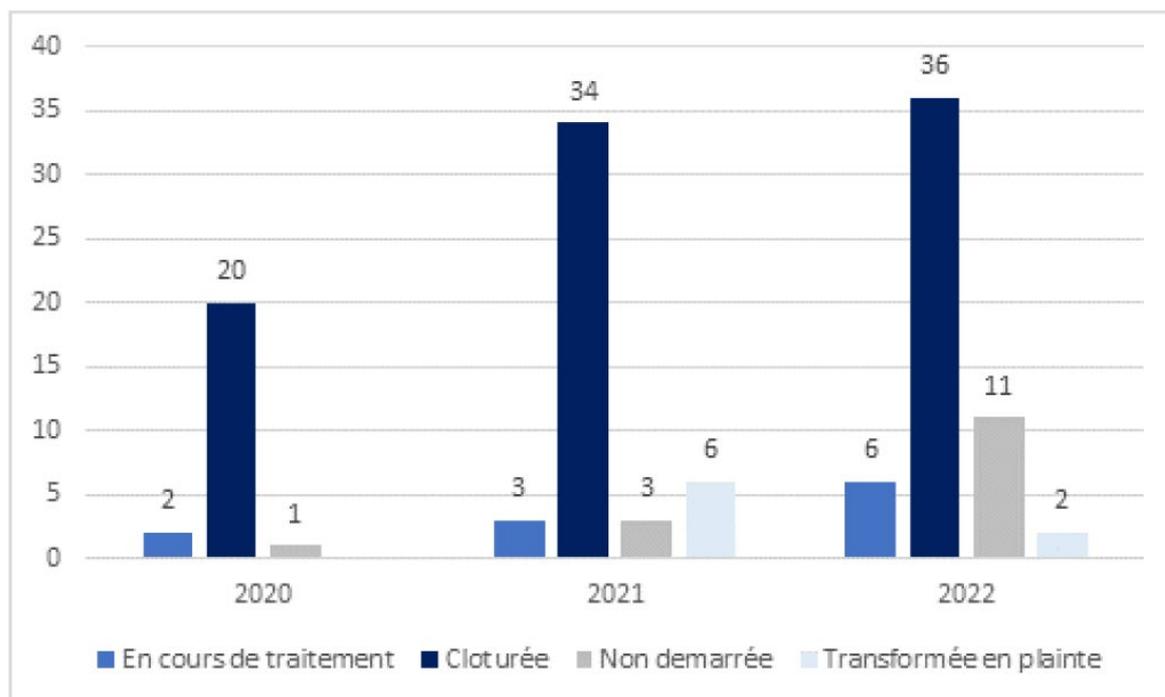


Figure 6-9: Status of Community Requests for Assistance in 2023

From the review of the doléance register provided as appendix to the Borrower’s quarterly certificate (Q1-2023), the IESC deems previous observations to be still valid in terms of requiring improvements to better keep track of the time it takes to manage communities’ requests and to better inform about the doléance status by including more up-to-date details (in the e.g. “comment” column), including reasons for rejection

Based on the review of a sample of minutes of the community meetings shared for review, the IESC notes that the CR team encourages participants requesting assistance to submit a written communication to the communal authorities copying CBG for a joint analysis of the request. As already reported in the last monitoring report (December 2022), CBG has established a community request for assistance (doléances) management procedure which has been disseminated to communities through Focus groups. The IESC has not received such procedure yet, and therefore is not aware of its content¹³.

6.4 Integrated Management System

The IESC has previously reported on CBG’s progress towards meeting ESAP Item 1, which requires CBG to 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 by January 2024.

CBG ESMS aims to satisfy the ISO, ASI and IFC requirements. The integration of IFC and ASI requirements within the company’s IMS has been ongoing since Q4 2021, following a roadmap. The roadmap has been prepared that outlines a set of major milestones (based upon actions, timeframes, and interim deliverables) required to achieve the deadline of January 2024, and in many cases specifies clear deadlines for the completion of actions specified in existing E&S management plans (and Action Plans therein).

¹³ The IESC has requested the procedure for community assistance management following the communication of this report to CBG

The Steering Committee is responsible for implementing the roadmap. The CBG Roadmap Steering Committee aims to lead the company to compliance with the ASI Performance Standard by April 2023 (which audit results were not yet available for review at the time of the site visit) and the IFC Performance Standards by the end of 2023. The Committee meets monthly and reviews the action plans and the progress of the management plans' implementation.

Each action plan is assigned a Director (the Sponsor, senior individual accountable for the success of Actions Plans/reporting to Steering Committee and supporting Champions in the delivery of Actions Plans e.g. provision of resources) as well as a Champion who responds to him within the framework of this action plan. The Chairman of the committee is the Director of Operations. As mentioned in the December 2022 report, this arrangement has enhanced the implementation of the Road Map through shared priorities and further prioritised resolution of environmental and social topics through the involvement of very senior management. Based on discussion held during the June 2023 site visit, the IESC can confirm the approach described above has continued to function well and the approach is resulting in significant progress.

The IESC main observations from the June 2023 site visit are:

- The Sharepoint document repository is working and found to be used by most CBG employees interviewed during the visit. The repository ensures document control and provides a single repository for documentation, thereby ensuring access and consistency of usage across all of CBG's functions.
- The Sponsors participated alongside the Champions during most meetings held with the IESC.
- The Sponsors overall have shown a good level of engagement, by their presence during the IESC meetings but also through discussions on challenges for the implementation of their action plans and ways forward.

The status of implementation for certain Action Plans, including plans that are behind schedule, is discussed further in subsequent chapters of this report. However, as a general observation, the Sponsors and Champions appeared to be fully engaged in the Road Map, with a clear understanding of their roles and responsibilities.

6.5 Environmental and Social Management Plans and Action Plans

CBG manages its environmental and social impacts through the implementation of a suite of E&S management plans. Many of these were prepared in late 2018/early 2019 with a 2-year review cycle envisaged. The IESC has highlighted the need to review and update certain environmental management plans in previous site visit reports¹⁴. Whereas CBG recognises the need to revise its management plans, it has delayed the review/update process preferring to tie any update to milestone events, such as completion of the Road Map (recognising the Road Map would likely inform any update of the management plans). The logic is understandable, however, the added delays resulting from the approach has resulted in several plans being out of date and content of the plans increasingly redundant. It is therefore recommended that CBG presents a schedule for the review and update of 'out of date' management plans to Policy Lenders/IESC, clearly stating any precursors or dependency on other events.

The implementation of the Action Plans related to the Management Plans is also behind schedule and to date CBG has been unable to recover from this slippage. Consequently, the timeframes for completion of the action plans is increasingly challenging and the IESC questions the feasibility of completing all the actions specified in the road map prior to the January 2024 deadline specified in the ESAP. This is addressed in Dec 2022 _021 finding in Appendix 3.

¹⁴ For example, Waste Management, Water Management, and Air Quality Management Plans

6.6 Procurement

The IESC has previously identified a protracted procurement process as a key reason for the slow implementation of actions in the management plans, for example, when ordering new equipment/commissioning specialist consultant/external service providers. The slow procurement process is thought to have broad consequences across CBG's operations and it was therefore the IESC's earlier recommendation that CBG undertake a detailed review of CBG's procurement procedures to identify bottlenecks and/or inefficiencies responsible for delaying the procurement of goods and services.

CBG has previously informed that whereas it acknowledges the procurement process can be slow, it does not plan to review the process in order to streamline. Consequently, no specific action had been taken to address this recommendation which therefore remains open in Appendix 3. Nevertheless, the procurement related delays noted in previous IESC reports appear to have eased (no significant E&S implications due to procurement problems) albeit the reasons for the apparent improvement are unknown. The IESC therefore intends to maintain a watching brief during future monitoring events to ensure procurements concerns do not recur in the future.

6.7 Management of Change

The IESC has previously reported poor implementation of the CBG Management of Change (MoC) Procedure and a number of initiatives to disseminate and reinvigorate the MoC procedure. In the March 2022 site visit report, the IESC reported that a new MoC Coordinator had been appointed and the MoC Procedure had undergone a review by the HSECQ Department, resulting in a number of recommendations relating to the update of the MoC procedure, the appointment of MoC Champions, staff training and a further roll out of the Procedure. During the December 2022 site visit, significant progress had been noticed: establishment of a MoC committee, drafting of a new MoC procedure, revised MoC register and revision to MoC forms.

During the June 2023 site visit, the IESC met with the MoC Coordinator (the Champion) and the Sponsor to discuss the current status of MoC. The MoC team (7 people) meets every week to follow up with MoC related actions. The procedure is currently being tested (and is currently available on the sharepoint) – testing expected to last between 6 months to a year, then approved internally, before being rolled out across the various CBG functions. The training material on the new procedure is ready and will be used for staff training once the procedure is approved.

Table 6-1: Summary of Findings, PS1

ID	Aspect	Issue Description	IESC Recommendation	Significance
June 2023 _001a	Organizational capacity and competence - staff resources	The permanent Resettlement Manager post remains to be filled.	CBG to continue in its efforts to recruit the Resettlement Manager for this, CBG should: <ul style="list-style-type: none"> • initiate recruitment by end Sep 2023 for all vacant positions; • Fill positions by end Dec 2023; • Where positions cannot be filled by end Dec 2023, initiate a formal review of reasons behind failure to fill position and provide alternative strategy to fill the function. Review to be complete by end Feb 2024. 	High
June 2023 _001b	Organizational capacity and competence - staff resources	The Environmental Monitoring Team Leader post is vacant and must be filled.	CBG to continue in its efforts to recruit the Environmental Monitoring Team Leader. For this, CBG should: <ul style="list-style-type: none"> • initiate recruitment by end Sep 2023 for all vacant positions; • Fill positions by end Dec 2023; • Where positions cannot be filled by end Dec 2023, initiate a formal review of reasons behind failure to fill position and provide alternative strategy to fill the function. Review to be complete by end Feb 2024. 	High

ID	Aspect	Issue Description	IESC Recommendation	Significance
June 2023 _001c	Organizational capacity and competence - staff resources	HSEC Director is still in vacant position. The current Acting HSEC Director is the head of HSE department.	CBG should also clarify its position with respect to the HSEC Director position: <ul style="list-style-type: none"> • initiate recruitment by end Sep 2023 for all vacant positions; • Fill positions by end Dec 2023; • Where positions cannot be filled by end Dec 2023, initiate a formal review of reasons behind failure to fill position and provide alternative strategy to fill the function. Review to be complete by end Feb 2024. 	High
June 2023 _002	IsoMetrix	CBG to ensure that IsoMetrix becomes a tool to monitor appropriate implementation of relevant ESMPs (e.g. SEP, Grievance Management Plan) and workflow proposed therein. This includes reporting of KPIs.	Templates and monitoring system to reflect workflow and timelines included in relevant ESMPs	Minor
June 2023 _003	Stakeholder Engagement_Gender Issues	Poor gender awareness as evidenced by a grievance/lack of training to date.	CBG to work on a structured plan to raise awareness on gender issues within CBG and among contractors, through: <ul style="list-style-type: none"> • Continuing awareness raising events, also considering AJDEF’s recommendations; • The involvement of CBG and Contractors’ male workforce in raising awareness initiatives 	Moderate
June 2023 _004a	Grievance Mechanism	Information currently available in the grievance register does not provide clear information on the progress made on open grievances.	Provision of more details to better clarify progress made is required within the Grievance register.	High

ID	Aspect	Issue Description	IESC Recommendation	Significance
June 2023 _004b	Grievance Mechanism	Details on the reasons underlying the closure of grievances is not provided in many grievance cases.	Justification for the closure of each grievance is expected	Minor
June 2023 _004c	Grievance Mechanism	3 grievances relate to accidents of stray animals crossing the railway, with one being still open since March 2023 which CBG has started recording. The IESC understands that, based on Guinean regulation, CBG is currently rejecting these types of grievances. It is therefore however unclear why one of these grievances still remains open since March 2023 (no comments provided in the register to further understand its status).	Address and close grievances related to stray animals crossing the railway.	Minor
June 2023 _005	Resettlement team capacity	The resettlement team is not staffed at the level commensurate with the level of effort required to address systemic issues and the on-going economic displacement of an additional +1000 PAPs (Mbouroré Plateau)	Finalise the on-going recruitment of other resettlement team members.	High

Certain findings from early IESC monitoring visits are yet to be closed including findings relating to the revision of EMPs, SMPs, dredging, elements of the Environmental Monitoring Programme, stakeholder engagement and grievances. These 'open' legacy findings are provided in [Appendix 3](#) of this report.

7. PERFORMANCE STANDARD 2: LABOUR AND WORKING CONDITIONS

7.1 Introduction

This June 2023 site visit report focuses on the following topics pertaining to labour and working conditions:

- Workers' Grievance Mechanism;
- Workers engaged by Third Parties;
- Occupational Health and Safety.

Key findings are presented on each of these topics below.

7.2 Labour and working conditions (general observations)

During the June 2023 site visit, the IESC did not carried out any specific meeting to discuss CBG's labour and working conditions, however some relevant material has been shared for review which demonstrates CBG's adoption of relevant rules, manual and code of conduct of high standard.

The signed HSECQ policy includes commitments to (1) motivating CBG's employees, and recognising the effort and the progress made with a view to improving private and working lives; communicating to all workers their rights and duties in relation to health and safety issues, including a stop work authority in case of identified risks at work; putting in place appropriate workers' engagement in the context of planning, implementation and evaluation of performances and areas for improvements of the HSECQ management system.

The Human Resource Manual (dated October 2020) contains all the relevant information pertaining to working conditions, including e.g. integration of new employees, working hours, leaves, disciplinary actions and code of conduct, union organization, non-discrimination and a specific section on women's rights at work; and indication on forced labour and child labour (prohibition). CBG respects and upholds at all levels the principle of freedom of association engages regularly with the trade union delegates elected every two years, in October. Employees are eligible to vote if they have been with the company for three months, and to stand for election if they have been employed for 12 months.

In terms of non-discrimination, the HR manual, specifically states the following "The CBG makes no distinction in terms of employment, in accordance with the principle of equal pay for equal work". On the other hand, the CBG encourages and promotes women. CBG actively supports its women workers in the protection of their specific rights and benefits as set out in the law, the collective agreement and company policies. CBG does not tolerate direct or indirect discrimination, harassment, exploitation or intolerance". As already discussed in Section 6.2 on stakeholder engagement, CBG's CR team has organized a first event as part of the celebration of the International Women's Rights Day (March 08, 2023) under the theme "innovation and technological change and education in the digital age to achieve gender equality between men and women". Recommendations have been put forth therein that also encourages areas for improvements to further contribute to gender equality, including targeting male workforce in these types of initiatives.

A workers' grievance and claims management, which describes CBG's procedure regarding grievance management, applies to all company employees and it is also open to employees of subcontracting companies who have complaints or claims relating to the CBG, or who feel that their complaints are not being adequately by their superiors and require the contribution of the CBG. The procedure includes details on roles and responsibilities, possibilities for escalation, and also includes the involvement of unions in the grievance management process. The procedure also

informs that complaint boxes are also placed in the toilets of divisional managers (however available to everyone) to enable employees wishing to make claims, complaints or allegations to do so in complete discretion. Boxes are managed by the Compliance and Ethics Manager, who visits once a month to collect claims, complaints and allegations. Importantly the procedure specifies that “The location of the suggestion boxes was established after consultation to provide employees with a private place to lodge complaints. Other locations may be chosen where appropriate or on the specific request of the employees. The IESC deems the procedure generally acceptable. A workers grievance register has not however been shared for review, despite the IESC’s request of this document, and it is not clear whether the grievance mechanism procedure is actually implemented. The IESC recommends that This will be further explored in the next monitoring visit.the worker grievance register be prepared and presented to the IESC during the November site visit and that the Workers Grievance Mechanism be disseminated through appropriate channels to CBG’s workforce within December 2023.

7.3 Identification of OHS risks and impacts

During the June 2023 site visit to the Kamsar plant (including contractor’s worksite), railway and active mine (including workshops).

7.3.1 Kamsar plant

Works on the hazardous waste area were in progress during the June 2023 site visit. In December 2022, the area was unsuitable for the storage of hazardous wastes. CBG started works to redevelop the site, which will be completed in 4 months (October 2023).

At the waste storage workplace (Tora Bora), the improvements noted in December 2022 are still in place, for example: employees know the risks and rules and facilities are provided for workers. However, findings requiring immediate attention were observed:

- There is no fire blanket on this area (previously identified in March 2022);
- There is no panel or barrier when the incinerator is opened to cool down. During this phase, the incinerator is switched off, so there is no temperature indication on the display screens (even though the temperature is around 150°C).

Elsewhere on the Kamsar plant, the contractor Soguidev was mandated by CBG to install paving stones and rainwater culverts. This workplace is improved since the last visit following implementation of a number of actions to address earlier findings, for example: contractor personnel interviewed were wearing the correct PPE and were able to articulate the risks and the rules, H&S documents are available in the work areas (inspections, Take5 assessments, permit to work approvals, task-specific job safety analyses). However, the footpath to the restrooms should be improved because of the current risk of falls.

Conveyor project (assembly and foundation workplaces)

The conveyor project currently in progress is located on 2 sites (assembly and foundation) and is managed by contractors INDUPROJ and TAKRAF. During the worksite visit, the IESC observed the correct use of the Take5 document, the holding of the “Toolbox meeting” in the morning, permit to work approvals, contractor personnel interviewed were wearing the correct PPE, the authorisation and driving licence of the interviewing driver are available and the crane working on site is inspected daily by the driver and its external regulatory certification is up to date.

However, a number of concerns and areas for improvement in terms of safety on contractors' worksites were identified as follows:

- There is no daily inspection of lifting tools (slings in particular);
- The workers interviewed were not aware of the location of the assembly point and the muster point panel was too small and in poor condition (not visible);
- Unsafe situation of a worker close to the excavation and on the wrong side of the marking.

Road risk

Several mobile speed cameras have been installed on site. At the moment, they are used for educational purposes, but after they could be used to systematically record and discipline drivers who break the rules.

7.3.2 Active Mine

At the heavy vehicles workshops (BIA and ATIKO contractors), the IESC observed a number of positive H&S aspects, such as the wearing of PPE, the completion of daily Take5 and ToolBox meetings and awareness of the emergency procedure. Furthermore, the IESC found that the colour control display for lifting equipment was up to date (June=blue). However, the following observations were made:

- The risk of a fall from height should be more identified in the contractor's Take5 form. Indeed, no protective measures are in place for this working at heights risk in the workshop, even though there is no barrier on the excavator while workers are working at height. To avoid this issue regarding Take5 form, CBG planned last year to order Take5 assessment booklets for all employees and its contractors;
- Employees interviewed were unable to articulate or explain whether the lifting equipment was compliant. They didn't seem to be aware of the colour system for the monthly checks (HS manager was on leave, his substitute was interviewed).

In another place on the active mine, the IESC visited the NITROKEMINE & NITROKEMFOR (EPC Groupe) and BEREMAT workshops. Many positive aspects were identified on these areas, but there were no ongoing activities of EPC group, so the inspection was restricted. The positive aspects were: the storage of hazardous materials by NITROKEMINE (ammonium nitrate and calcium nitrate in particular), employee training, permits and authorisations, and the efficiency of the dust vacuum on the BEREMAT surface miner (designed to collect dust at source, reducing the dust emitted and protecting workers' health).

7.3.3 Railway

The new WABTEC system (onboard signalisation and switch automation) is due to be in place by the end of 2023. With Wabtec, railway traffic will be managed fully from the CCF ("Centre de Contrôle Ferroviaire": railway control centre room).

In June 2023, it is still being implemented, thus, at the next visit, it will be necessary to visit the CCF.

Overall, the situation has not changed since the last visit in December 2022: switchmen (aiguilleurs) are still needed. Switchmen can communicate with CCF by radio and flagmen (hommes piquets) positioned along the railway line to improve community safety, can communicate by mobile phone. In addition to this process, a car (with alarm and flashing light) follows the train throughout its journey to announce its arrival. The car travels on the road parallel to the railway only when the railway is close to the road.

In view of the recent fatality of a switchman, switchmen (Sotrac contractor) were interviewed at the scene of the accident during their working hours (see Section 7.7.1.).

7.4 OHS system

7.4.1 Integrated Management System and ASI Certification

In 2023, the CBG completed the centralisation of all its systems into one Integrated Management System (SMI: *Système de Management Intégré*) deployed on Sharepoint. This organisation provides better document management, both for forms and for archiving. Sharepoint is organised into 17 elements intended to meet IFC, ISO and ASI requirements.

This initiative represents an improvement in safety management. Nevertheless, this new organisation has not yet filled the gaps in the tracking of the action plans and management plans (the ESAP Section 6.5). Findings already identified during the previous IESC visit.

7.4.2 Documentation process and Contractor Management Plan

During the June 2023 site visit, the IESC noted a real improvement in the management of H&S documents on site (both by the operational CBG/contractor teams and by the H&S teams): documents were available in the workplaces, and they were completed (see Section 7.2).

Contractor Management Plan

In October 2021, CBG started the process of deploying the new Contractor Management Plan (CMP) with the establishment of a committee involving the H&S, HR, procurement and legal departments. The pilot phase (presented in December 2022) was closed in March 2023 and the new CMP has been in place since that date.

In June 2023, the committee's action plan indicates that 95% of the CMP's actions have been completed. The first stages of the process (called implementation stages) seem to be working well: 1 pre-qualification, 2-3-4 tender process, 5 contractual agreement, 6 training, 7 kickoff meeting. Each contractor is classified: there are 3 levels depending on the type of work. The H&S requirements in the new CMP include the WBG EHS Guidelines and are aligned to the levels of each contractor category.

However, the final stages of the process (8 inspection and 9 post-evaluation) required to manage and update contractors are still poorly managed. CBG is aware and is seeking to recruit a CMP coordinator. Pending this recruitment and to cover these final stages, the committee should assign a CBG manager per contractor as previously announced.

7.5 Organizational capacity and competency

7.5.1 OHS organization

As detailed in section 6.1.4, the role of HSEC Director is still vacant (currently duties of the HSEC Director are being performed by the Acting HSEC Director) and advisors are currently being recruited. Despite this, the Sponsor/Champion/Officer organization appears to be working to manage and track H&S actions from inspections and audits. This organization is managed by various committees and regular monitoring meetings (regulatory, weekly or monthly).

In addition to these internal resources, CBG often requests ALCOA's external experts to assist in areas such as railway risk, electrical arflash risk, maintenance and asset management (mobile machinery/equipment). The follow-up of these external actions requires internal resources with technical knowledge in these areas.

OHS Training

As previously identified in 2022, there is still no system for tracking out-of-date certifications and training courses and the tool used to monitor training is basic, being based on a simple Excel table.

In 2023, CBG continued to include contractors in its own training management plan. Contractors and CBG staff are therefore still trained by Dupond (safety leadership, H&S observation and safety interaction) and CACES (Certificates of Aptitude for the Operation of Safety Equipment).

The Directors have been trained by Dupond DSS+, and the feedback has been positive (including from employees, as the Directors apply what they have learned).

In June 2023, the IESC attended a safety induction which included awareness raising of the Golden Rules.

7.5.2 Leadership, Commitment and Accountability

As in 2022, the involvement of CBG's management is effective, notably with the 2 steering committee meetings per month and the roles of the sponsors (the last report indicates that 95% of the actions have been completed). A second important meeting regarding the management's commitment to H&S is the "Maintenance Operations Review Meeting" (also twice a month). This meeting is attended by the senior managers of the relevant divisions. These meetings demonstrate the involvement of the operational managers (management of action plans and monitoring of the progress of actions). In addition, senior managers comply with their audit/inspection commitments and a H&S award system, available to all staff, was implemented by CBG.

Overall, the IESC confirms the trend, observed in 2022, of improving the safety culture on the ground (e.g. PPE and golden safety rules) and at the top of the hierarchy. Efforts are also visible (H&S documentation on site) but still need to be continued for local supervisors and team leaders.

7.6 Workers Engaged by Third Parties

During the June 2023 site visit, the action plan of the committee in charge of the Contractor Management Plan (CMP - involving the H&S, HR, procurement and legal departments) indicates that among the relevant amendments foreseen of the CMP there will be a section on Human Rights and more social commitments. From the material shared for review and discussion held on site the IESC also understand that by June 2023 (Q2-2023) CBG plans to complete the following activities (also refer to previous sections of this chapters):

- Recruitment of a replacement CMP coordinator;
- Finalization of the CMP procedure;
- CMP training for contract managers and project managers; and
- Finalization of the register of contractors classified by category

From the meeting with the committee's action plan, the IESC understood that since March 2023 contracts with contractors will include new human rights obligations to better ensure contractors' compliance with these matters. A couple of contracts amendments dated respectively April 2023 and June 2023) have been shared for review, which indeed include an obligation for the contractor and their employees to comply with all applicable Human Rights regulations, including prohibition to participate directly or indirectly in armed conflicts, to use forced and/or child labour, to non-discrimination, including gender discrimination.

During the June 2023 site visit, the IESC interviewed some workers from different contractors at the mine, specifically workers from BIA, ATIKO, and NITROKEMINE; and security guards located in two different security posts, managed by EGB and SOTRAC at the mine.

The IESC noted that:

- Interviews with the international subcontractors' workers such as BIA, ATIKO and NITROKEMINE, generally indicated presence of contracts, standards working hours and shifts, presence of Unions. In the ATIKO area, a canteen and a praying area was also observed on site. Workers did not express any concerns pertaining to working conditions. Limited

information has been observed in relation to grievance mechanism although the majority of workers indicated the possibility to talk to supervisors or unions. Importantly, CBG's workers grievance management procedure (also refer to Section 7.2) can also apply to subcontractors' workers - this was not mentioned by the interviewed workers, although CBG's committee confirmed that the procedure is communicated to all workers.

- Interviews with security guards contracted via local subcontractors showed working conditions requiring improvements: workers were observed with no contracts or no copy of contracts; working hours were reported to be 10 hours shift during the day, and 14 during the night shift (two shifts per day), SOTRAC's workers reported 3 shifts per day during the Ramadan period, although the IESC understands that this is not a general rule and that decision over working hours reduction is made by each contractor with neither guidelines nor supervisions provided by CBG; security posts had no electricity, and workers use of their mobile phone as a torch, some of them reported to charge their phone at home. All interviewed workers bring water and food from home. The IESC observed lack of toilets in each security post. CBG should consider installing portable toilets especially at posts adjacent to roads intersections with intense traffic, to avoid security guards crossing the road for basic needs.

All that being considered, the IESC recommends the following:

- The Contractor Management Plan in need to be finalized as a matter of priority, with regular supervision of aspects relative to working conditions and human rights included in checklists and audits.
- In the interim, a rapid audit of working conditions of security guards (and other local contractors) is to be conducted to verify any non-compliances in terms of labour and working conditions; and check for any areas for improvements (such as considerations of working hours reduction under Ramadan period).
- As the IESC did not observed any grievance mechanism procedures at the interviewed contractors, CBG should also ensure to better convey presence of CBG's workers grievance management procedures among all contractors' workers – information could be included in the material the CR team is currently preparing as part of the E&S induction for all workers (refer to section 6.1.6 for more details) – and to verify the need to install more grievance boxes in the project area, including the mines – to facilitate the submission of grievances, including anonymous submissions.

7.7 Monitoring and review

7.7.1 Incident Investigations and Root Cause Analysis

The CBG continues to apply the Incident Cause Analysis Method (ICAM) System for the investigation of work-related incidents.

This section focuses on the most recent fatality on 15 March 2023: collision between train N°406 CBG and the tamper leading to the crushing of Sotrac switchman at the PK 99.9 - GOBIRE. After this fatality, investigations were conducted by the designated teams (CBG H&S teams, CFB H&S and operational teams). One of the root causes identified in the report is the lack/absence of control to confirm the completion of work on the site. Working hours, temperatures at the time of the accident and the Ramadan period were also considered on the report. The actions identified in the report were completed on schedule (except for the action regarding the modification of working hours on switchmen's work contracts).

It should be noted that Sotrac was not involved in drafting the investigation report (Sotrac employees were interviewed during the investigations).

A trend, already observed in 2022 following the review of Root Cause Analyses, indicates that the analysis focuses on individuals' actions and did not always capture organisational root causes.

Consequently, corrective actions tend to be localized, focusing on personnel on the ground rather than being applied more widely across CBG’s operations. In that respect, another root cause that could emerge is the absence/lack of communication between the teams in charge of the works and the other teams involved on rail traffic regarding the progress of the works (new switch and current/former switch).

During the June 2023 site visit, the IESC visited the scene of the accident and interviewed Sotrac switchman who were working on site. The following observations were made:

- There were no HS documents on site and the switchman's logbook makes no mention of any past or future HS events in the area. For example, we do not know whether a POV is in progress (POV: permis d'occupation de la voie - Track Occupation Permit);
- One action implemented after the accident was to increase the distance between the track and the switchmen from 5 to 10 metres during the passage of a train. This 10 metres distance is difficult to apply because the track sides are not always designed or maintained to this width.

An observation made in December 2022 is also still relevant and could have major consequences:

- Flagmen don’t have radio (they have a mobile phone), they can’t talk to each other. Switchmen can’t easily communicate with flagmen in case of emergency. There is no general and rapid alarm system to inform all the people involved at the same time.

The new signalisation and control system being installed by Wabtec is not working yet (see Section 7.3.3.), so the current period and commissioning period will be critical if any work is performed on the railway. A specific action plan should be prepared and discussed with all stakeholders using and working on the railway.

7.7.2 KPIs

The KPIs for 2022 presented during the visit are better than those for 2021 (see figure below). Events at the base of the pyramid are increasing, while events at the top are decreasing. From a more specific point of view, the recording of unsafe situations (demonstrating better awareness of unsafe conditions) has increased. This reflects the involvement of a greater number of workers and enables the HS team to work more on prevention.

In June 2023, despite the fatality, the trend in HS indicators for 2023 is more or less the same.

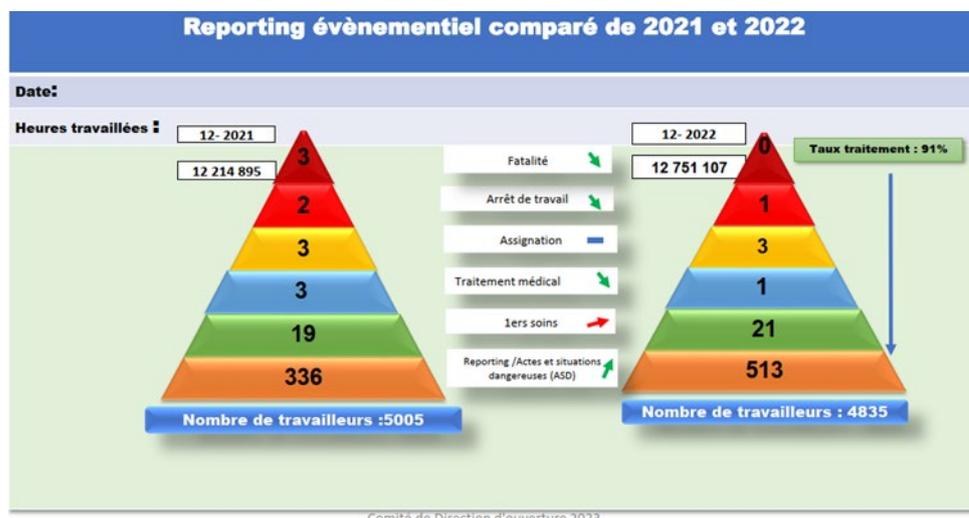


Figure 7-1: H&S KPIs 2021 and 2022

7.7.3 OHS Performance

A number of positive observations regarding H&S management and performance are reported:

- Sharepoint is working (documentary resource and archiving) and structured into 17 elements;
- ASI certification process is ongoing¹⁵;
- PTW signature process is more efficient (operational teams manage and HS teams approve);
- The H&S officer only records the H&S data (KPI) on the worksite (he doesn't keep the documents);
- Number of employees trained (internal and external);
- 100% of top management inspections scheduled have been performed.

However, there's still work to be done in terms of managing the system and the overall H&S strategy. A lack of strategic vision is still observed:

- KPIs updates, the list of the H&S action plans and the percentages of completion should be shared with the top Management. So that they can take decisions/prioritise actions;
- Improve analysis of H&S KPIs, add proof of system effectiveness (continuous improvement):
- KPIs should be better managed by using leading indicators with measurable targets;
- KPIs should be improved by segregating them for contractors and CBG employees.

These findings are quite similar to those identified in December 2022.

A new finding concerns the AMR 2022 (Annual Monitoring Report). In this report, the summary for 2022 (for chapter PS2), doesn't specify whether incidents have been analysed or whether actions have been implemented. There is no classification of actions either. There is no conclusion for 2022: effectiveness of prevention and control strategies. In this regard, future AMRs should present more detail on the analysis of incident causes and actions taken.

To implement these strategic and major improvements and after the recruitment of the 8 new people (as indicated by CBG), CBG should reorganize the distribution of HS teams. Indeed, H&S leaders should be given more time to manage with a cross-functional approach with respect to:

- Contractors;
- priority actions;
- external experts and associated internal actions;
- more leading KPIs.

¹⁵ The ASI certification process initiated by CBG covers the following topics: Management involvement, standardisation of policy and procedures, and training of employees and contractors.

Table 7-1: Summary of Findings, PS2

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
June 2023 _006	Risks and impacts	Numerous findings from Kamsar plant (waste storage workplace, Conveyor project) and active mine (heavy vehicles workshops)	All	<ul style="list-style-type: none"> • Waste storage workplace (Tora Bora) <ul style="list-style-type: none"> ○ Check the emergency kit on site and add fire blanket ○ Managed incinerator when is opened to cool down • Conveyor project <ul style="list-style-type: none"> ○ Add slings on lift equipment daily inspected ○ Improve and share the location of the assembly point ○ Check whether employees are aware of the excavation risks • Heavy vehicles workshops <ul style="list-style-type: none"> ○ Clarify the strategy for the CBG Take5 booklet ○ Perform an H&S inspection to identify risks ○ Sharing and raising awareness all employees of the rules regarding lifting equipment 	Moderate
June 2023 _007	OHS system, organization and performance	HSECQ Resources and lack of follow-up to the multiple action plan(s) may result in the reoccurrence of similar serious events	All	<ul style="list-style-type: none"> • Reorganize the teams and allocate staff according to their skills to finalise the numerous action plans, particularly when it comes to managing actions with external experts 	Moderate
June 2023 _008	Workers Engaged by Third Parties_Contractor Management Plan	CBG is seeking to recruit a new CMP coordinator to manage the final stages of the CMP process	All	<ul style="list-style-type: none"> • Complete recruitment of a CMP coordinator • Pending this recruitment and to cover these final stages, the committee should assign a CBG manager per contractor as previously announced 	Moderate
June 2023 _009a	Labour and Working Conditions	The IESC deems the workers' grievance and claims management procedure generally acceptable. A workers grievance register has not however		<ul style="list-style-type: none"> • The worker grievance register to be prepared and presented to the IESC during the November 2023 site visit; 	Moderate

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
		been shared for review, despite the IESC's request of this document, and it is not clear whether the grievance mechanism procedure is actually implemented.		<ul style="list-style-type: none"> The Workers Grievance Mechanism be disseminated through appropriate channels to CBG's workforce within December 2023. 	
June 2023 _009b	Workers Engaged by Third Parties_Contractor Management	Interviews with security guards contracted with local subcontractors showed working conditions requiring improvements in terms of labour and working conditions and check for any areas for improvements (such as considerations of working hours reduction under Ramadan period)	All	Contractor Management Plan to be finalized as a matter of priority, with regular supervision of aspects relative to working conditions and human rights included in checklists and audits.	Moderate
June 2023 _010	Workers Engaged by Third Parties_Contractor Management		All	A rapid audit of working conditions of security guards (and other local contractors) is to be conducted as a priority to verify any non-compliances/opportunities for improvements in terms of labour and working conditions	High
June 2023 _011	Workers Engaged by Third Parties_Contractor Management		All	CBG to better convey presence of CBG's workers' grievance management procedures among all contractor' workers and to verify the need to install more grievance boxes in the project area, including the mine areas to facilitate easy submission of grievances, including anonymous submissions.	Moderate
June 2023 _012	Monitoring and review	Incident Investigations and Root Cause Analysis	All	<ul style="list-style-type: none"> Close all outstanding actions relating to the fatality Involve more representatives of companies implicated in accidents (Sotrac regarding last fatality) Last railway fatality: <ul style="list-style-type: none"> Investigate the absence/lack of communication between the teams in charge of the works and the other teams involved on rail traffic regarding the progress of the works Define methods for sharing H&S information between workers (shift changes) 	High

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
				<ul style="list-style-type: none"> ○ clarify and test the feasibility of the new distance required between the track and the switchmen or flagmen ○ Strengthen the communication between the CCF and all workers (switchmen and flagmen) in the vicinity of the railway track ○ A specific action plan should be prepared and discussed with all stakeholders using and working on the railway 	
June 2023 _013	Monitoring and review	OHS performance		<ul style="list-style-type: none"> • KPIs updates, the list of the H&S action plans and the percentages of completion should be shared with the Senior Management so that they can make better informed decisions with an overall view • Improve analysis of H&S KPIs, add proof of system effectiveness (continuous improvement): <ul style="list-style-type: none"> ○ KPIs should be better managed by using leading indicators and targets ○ KPIs should be improved by segregating them for contractors and CBG employees • On the Annual Monitoring Report 2022: <ul style="list-style-type: none"> ○ Add analysis and classification of incidents ○ Add analysis and classification of actions ○ Add a conclusion to the past year and define the objectives for the coming year 	Moderate

Certain findings from early IESC monitoring visits are yet to be closed. These 'open' legacy findings are provided in [Appendix 3](#) of this report.

8. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

8.1 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 and waste management.

8.2 Environmental Monitoring

The December 2022 IESC Monitoring Report highlighted the following areas of progress:

- Contracts with laboratories remained in place and analysis of environmental samples was ongoing.
- The air quality monitoring station in Kamsar was functioning.
- The server needed to improve operability of IsoMetrix is now in place (use of IsoMetrix for environmental monitoring results reportedly imminent)
- Two new seismometers were procured and were in use.

As of June 2023, the status is as follows:

- Significant increase of environmental monitoring performed thanks to the increased capacity of the environmental monitoring team (5 additional people);
- Environmental samples testing is contracted with laboratories and new water quality testing equipment has been received;
- NO_x and SO_x are not currently monitored at the air quality monitoring station in Kamsar due to equipment malfunctions;
- Information related to environmental monitoring (i.e. results from testing or sampling) and all environmental management plans are available to all environmental teams at CBG on a sharepoint;
- Information on environmental monitoring results is not yet disclosed to the communities, this must be done as a matter of priority.

Update on the environmental monitoring following the June 2023 site visit is provided below.

8.2.1 Environmental Monitoring Programme

CBG has been working on meeting the expectations from the 2019 Environmental Monitoring Programme (EMoP). During the June 2023 site visit, CBG informed all analysis contracts with external laboratories have been signed (as previously reported) and mentioned the water quality analysis is now being performed on all parameters required in the EMoP (verified by the IESC). Moreover, CBG's own laboratory has recently acquired new water analysis equipment (seen during the June 2023 site visit) one located at the Kamsar laboratory and one at the Sangaredi drinking water treatment plant. This equipment enhances in-house testing capacity. Other equipment is being delivered (i.e. new NO_x and SO_x measurement equipment for the Kamsar air quality station - currently the NO_x and SO_x monitoring equipment does not connect to the station making automatic download of data cumbersome). A weather station was also being commissioned at the time of the site visit.

8.2.2 Recruitment of Additional Team Member(s)

The IESC previously expressed its view that CBG's environmental monitoring team was under resourced, particularly recognising an anticipated increase in workload as sample collection and analyses ramped up following agreement with external laboratories. In late 2022, CBG has recruited 5 new people to strengthen the monitoring team capacity in the view of the amount of monitoring required for the site's activities. Three are based in Sangarédi and 2 are in Kamsar. During the June 2023 site visit CBG informed that these new recruits helped to increase the number of samples taken, hence reducing the number of omissions from 29% in December 2022 to 17% in May 2023. However, from March to May, the percentage of monitoring samples taken stabilized around 17% omissions. The evolution of the performance of the team will be closely looked during the next site visit and recommendations will be made to reduce omissions close to 0% (number of team members, or cars, sampling equipment, laboratory capacity etc.).

8.2.3 Environmental monitoring database

All environmental management plans, the results from the environmental monitoring, and other environmental related documentation (such as the presentations given during the ASI and IESC audits) are now available on a SharePoint and accessible to the CBG environmental team.

8.2.4 Disclosure of Monitoring Results

The IESC has previously reported CBG's commitment within its management plans to disclose the results of its environmental monitoring to affected communities and that a protocol for disclosure of environmental monitoring results was scheduled for finalisation in June 2022. As of June 2023, CBG informed that a participatory monitoring procedure that includes the disclosure of results has been developed and that its implementation was ongoing. However, CBG informed the protocol for disclosure of water monitoring results was under review at the time of the site visit. The IESC urges CBG to implement the procedure and communicate on the community well water quality results in an appropriate non-technical manner as a matter of urgency. Indeed, during the IESC discussion with communities in Fassaly Foutabhé, some inhabitants expressed their concerns over the water quality of the CBG wells, although most of them seemed satisfied with the overall water taste and pump functioning and flow. Thus, the earlier IESC finding remains open (see [Appendix 3](#), Dec 2022 _013).

8.3 Water Quality

Water management was identified as a focus area for the monitoring visit; the IESC has visited the domestic wastewater facilities in Kamsar and Sangarédi, the industrial wastewater treatment at the tank farm (Kamsar), the Cogon drinking water plant in Sangarédi, sedimentation ponds built in 2020 located upstream from Fassaly Foutabhé village. A team from the IESC, comprised of environmental and resettlement specialist, was also able to meet with community members from the village of Fassaly Foutabhé. This covers a number of areas deemed by the IESC to be priority areas as follows:

- Implementation of Water Management Plan – general status;
- Surface water drainage at Kamsar port;
- Industrial wastewater treatment (Oil/Water Separator) at Tank Farm (Kamsar);
- Surface water management at Sangarédi;
- Community Water resources at Fassaly Foutabhé.

8.3.1 Water Management Plan – status of implementation

The figure below shows planned progress against actual progress implementing actions within the Water Management Plan as of Q2, 2023. As indicated above, the metrics are crude, but nevertheless actual progress is well behind planned progress in Q2, 2023, showing around 1 year delay in comparison to the planned progress.

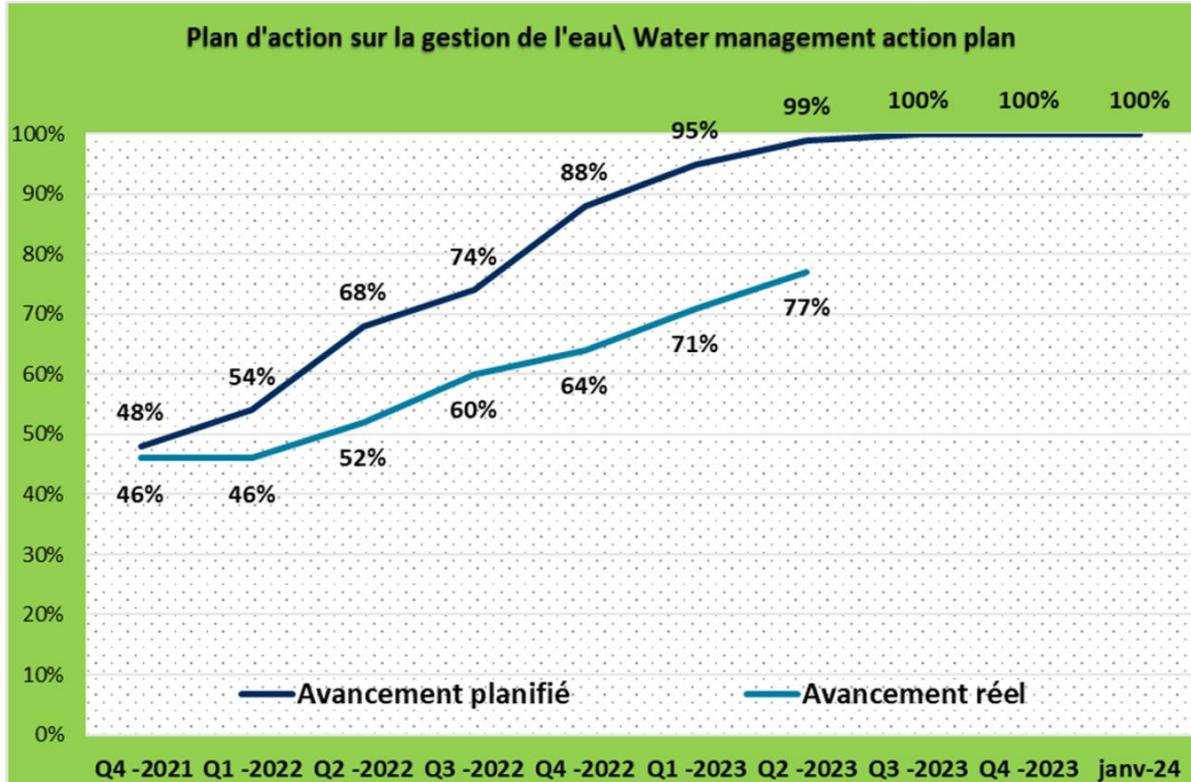


Figure 8-1: Status of Water Management Action Plan implementation (as of 31st May 2023)

CBG should consider further periodic reforecasting and focus on bottlenecks/critical items preventing completion of actions by January 2024. In the IESC’s opinion, implementation of the remaining actions in the WMP by January 2024 is now highly unlikely.

This finding and recommendation is equally applicable to other environmental action plans.

Further commentary on specific action within the Water Management Plan that are behind schedule are discussed in the sections below.

8.3.2 Surface water drainage at Kamsar

Surface water drainage capacity

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

A number of preliminary designs were shared with the IESC, however these have been dismissed by CBG. Consequently, CBG engineering team has revisited the drainage design following the IESC December 2022 site visit and determined that only 1 drain must be extended to meet the required capacity for a Probable Maximum Precipitation (PMP) event of 1:50. The results from the work performed by CBG engineering team will be shared with CBG management, which will decide on

the actions to be undertaken. The December 2022 site visit report mentioned that initial intention was to undertake any necessary upgrade works by the end of 2023. Whereas this target date is theoretically achievable, the limited progress to date, coupled with the absence of a clear plan and schedule, puts this action at risk. It is recommended that a clear timebound plan be developed and the timeframes are fed into a revised forecast, such that any slippage beyond January 2024 is known and communicated to lenders.

During the June 2023 site visit, CBG informed that the 'grand canal' which collects most of the surface water from the Kamsar, was showing signs of aging and will be rehabilitated. No timeline was communicated. It is recommended that a clear timebound plan be developed and the timeframes are fed into a revised forecast, such that any slippage beyond January 2024 is known and communicated to lenders.

This observation is included in the item Dec 2022 _ 031 from the December 2022 site visit, which remains opened in Appendix 3.

Surface water quality

The surface water flowing onto Kamsar site is collected through a system of drains, which subsequently flow into the sea. In addition to the drains, the 'grand canal' (located east from the bauxite stockpiles) gathers surface waters flowing from the stockpiles (see picture below). CBG registered 12 surface water exit points to the sea (revealed through CBG engineering team's work on drainage system mentioned above). The IESC March 2022 report mentions elevated COD levels and suspended sediments were recorded in surface river water surrounding the Kamsar processing facility, and that surface water discharge channels (fed by dewatering of the primary crusher pit) were heavily laden with fine sediments and were observed discharging to the River Dougoufisa with no apparent sediment trap in place.

During the June 2023 site visit, the CBG team informed the IESC that the drainage system for the surface water and stormwater at the site showed high sediment and oil concentrations in the past. The sediments found in surface water are produced by the bauxite fugitive emissions on site, and the oil content was due to non-functioning pumps at some of the site's sumps. Since the December 2022 site visit, CBG has undertaken the following actions to overcome these issues:

- Cleaning of the surface water drains on a regular basis to ultimately reduce the sediments emission to the sea. The frequency of the inspection is unknown. No inspection report was shared with Ramboll. In addition to the cleaning drainage channels (which itself can cause resuspension of sediments), the IESC recommends the installation of sediment traps prior to discharge of surface waters to sea;
- Repair of all the pumps in the site's sumps to reduce the oil concentrations in the surface water outlets;
- Training of site's personnel on reduction of pollutants emission (first training was given in March 2023)
- Frequent sumps inspection. The frequency of the inspection is unknown.

Despite CBG efforts to maintain the drainage system, half of the suspended materials measured at the surface water monitoring points (measured late May early June 2023) are higher than the limits specified in the EMoP (dated 2022). To lower the surface water sediment content to a satisfying level, it is crucial that CBG works on reducing the overall emissions of dust at the Kamsar site, in accordance with the air quality requirements, see section 8.5, and works on its stormwater management on site. The reduction of emissions, including fugitive emissions and implementation of the maintenance actions for the surface water drainage in Kamsar are both required to improve the situation.

This observation is captured in the air quality item March 2022_015, which remains opened in Appendix 3.



Figure 8-2 The 'grand Canal'

8.3.3 Water consumption and industrial wastewater treatment in Kamsar

Oil/Water Separator at Tank Farm

The IESC has reported in successive Monitoring Reports discharge of treated effluent from the oil water separator that exceed Guinean (50mg/l) and IFC (10mg/l) oil in water limits. That situation led to the development of an Oil Water Separator Corrective Action Plan (OWS CAP). The key components of the OWS CAP are described below along with a status update for due actions.

Action	Status (June 2023)
Cleaning and maintenance of existing plant	Completed (see IESC December 2022 monitoring report)
Procurement and installation of a temporary quick fix	Completed. The modular OWS unit has been installed, showing a great improvement of the oil concentration at the outlet (with concentrations ranging from 8 to 14 mg/l). However, the oil content in the effluent is not yet always below the IFC threshold of 10 mg/l.
Performance audit (to identify cause of exceedance/propose a permanent solution)	Completed by an external specialist firm. Corrective actions have been undertaken to reduce oil at source, thus preventing oil reaching and overloading the current OWS.
Engineering and design for the permanent solution (hydrocyclone)	Basic engineering completed and specification provide to potential suppliers. The use of the temporary fix [Dissolved air flotation (DAF) System] as a long-term solution is tested during the raining season (July – September 2023). If the temporary fix is meeting the effluent water quality thresholds at the outlet during the rainy season, CBG will consider leave the DAF system permanently.
Construction and installation of permanent solution	Not started. Depends on the performance of the DAF system (see line above)

In the December 2022 IESC monitoring report, the IESC mentioned the modular Oil Water Separator (OWS) unit had arrived in Guinea. Since December 2022, CBG has installed the OWS unit and the discharge shows an oil and grease content ranging from 3 to 20 mg/l (from week 17 to 28, year 2023).

During the June 2023 site visit, CBG mentioned they have found the reason behind each non-compliant event, which strengthen CBG operational knowledge of the system.

Since December 2022, CBG has made a great improvement in its efforts to consistently attain compliance at the industrial wastewater outlet in Kamsar with the installation of the DAF system. CBG continues to communicate on the performance of the OWS unit and will agree the way forward with Lenders once the rainy season will be over. *Post visit note: the system has shown good performance during rainy season.*

The implementation of a permanent fix is currently behind schedule, however this is of low concern to the IESC whilst the temporary fix remains operational and compliance with applicable standards is maintained.

Water usage and industrial wastewater reuse

During the June 2023 site visit, CBG informed that the water flow processed by the OWS was not known, and that this information cannot be deduced from upstream uses as these were not measured in a systematic way. Although the water consumption of the Kamsar plant and some of the water usages in the plant are recorded, it is recommended to install water meters at the main contributors to wastewater production (locomotives cleaning station, and power station).

This will help CBG to further understand water consumption on site, and draft water saving strategies.

There is currently no plan to reuse the industrial wastewater from the OWS unit. This might be interesting to consider once the industrial wastewater quality will be compliant.

8.3.4 Communities' water resources

General considerations

Communities can be affected by CBG mine operations if their water resources (surface water or groundwater) are impacted by CBG mine operations.

CBG representative explained that CBG provides the funds for the drinking water boreholes, and SNAPE (National Water Supply Point Management Services) builds the boreholes. CBG is not responsible for maintenance of the boreholes; instead, the communities (as owners of the facility) and SNAPE, are responsible for maintenance of the boreholes/iron removal devices, including water quality sampling. However, it is understood CBG performs additional water testing on occasion to monitor the water quality and uses the results internally.

During the June 2023 site visit, it was difficult for the CBG representatives to communicate on the exact number of boreholes funded by CBG. Moreover, as CBG is not responsible for their monitoring, the boreholes do not show on the monitoring map and their water quality results were not communicated.

The December 2022 IESC site visit report mentions that CBG commissioned SNAPE to carry out a diagnostic visit and assessment of water needs in nearly 50 villages in the mine. The results from this assessment were submitted to the CBG Board of Directors for evaluation but as yet have not been shared with the IESC for review.

Although CBG is not responsible for maintenance of the boreholes, it is important CBG ensures strong liaison with SNAPE to be informed on the water quality at the wells within the affected communities (for instance as part of the "Comité de gestion des forages" or boreholes committee). This will enhance CBG knowledge of the boreholes (water quality, condition etc.) and will ensure a prompt response from CBG in case the boreholes do not operate as expected (due to CBG operations' impact the water resource or lack of maintenance). Indeed, the international standards (PS1) mention that "While the client cannot control [...] government or third-party actions, an effective ESMS should identify the different entities involved and the roles they play, [...] and opportunities to collaborate with these third parties in order to help achieve environmental and social outcomes that are consistent with the Performance Standards".

Moreover, CBG is not the only user of groundwater resources. Indeed, as mentioned during the previous sections, communities are using the groundwater for their daily needs, and other mines in the area (the nearby SMB and COBAD mines) might use the resource for their operations too. During the site visit, the IESC was informed CBG has commissioned Alcoa experts to assess the

impact of the mining activity on groundwater, however this information was later not confirmed. Therefore, the IESC will ensure to clarify this information for the next site visit, review available documentation on this topic once available, and will assess its relevance in addressing these cumulative impacts on groundwater.

Finally, the removal of the vegetation associated with the mining activity causes the production of sediments which, if not managed properly, pollute surrounding surface waters during rainy events. CBG mentioned the surface water sampling results in the vicinity of Sangarédi shows high turbidity levels in surface waters despite the presence of sedimentation basins on site. The results from the surface water quality testing in Sangarédi showed compliant sediment concentration, however the sampling was performed in January 2023, thus during the dry season. It is recommended that CBG leverages the results from the Alcoa expert visit at the Parawi stockpile (see below sub-section) to improve the sediments control on the whole site and ultimately reduce the suspended solids in the surface waters around the site. The IESC will closely look at the water monitoring results gathered during the 2023 rainy season during the next site visit.

In this context, it is difficult to for the IESC (and possible for CBG itself) to apprehend CBG's impacts on water resources (both groundwater and surface water) with the information currently available. Therefore, the IESC recommends CBG to perform an impact assessment of the mine activity on water resources as well as a cumulative impact study on this.

The IESC is aware issue is also being discussed within the CAO DR process.

The Fassaly Foutabhé case

The IESC has previously reported on high turbidity levels in a stream, originating from springs close to the Parawi stockpile, which is used for bathing and washing purposes by the village of Fassaly Foutabhé (approximately 1km downstream from the springs). During the June 2023 site visit, CBG representative mentioned the pollution originates from CBG's mining activities (Parawi stockpile). To this date, attempts to reduce the turbidity levels through construction of settling ponds downstream of the Parawi stockpile have proved unsuccessful (see next section on surface water management on the mine).

The stream originating from springs downstream from the Parawi stockpile was used by the Fassaly Foutabhé community for their water needs. To mitigate for the poor water quality in the stream following the installation of the Parawi stockpile upstream from the sources, CBG has provided 4 wells to the Fassaly Foutabhé community.

During the June site visit, the IESC visited the affected stream's bed (Fassalywol stream) and met with community members from Fassaly Foutabhé. The stream water quality was not observed as the stream was dry (the rainy season had not yet started). The IESC heard community members' concerns, including those relating to water resources. Primary concerns previously expressed by the participants and repeated during the June 2023 meeting included:

1. Deterioration in the water quality in the Fassalywol stream making it unusable;
2. Water quality monitoring results at boreholes were not being shared;
3. The lack of communication on SNAPE agenda for boreholes inspections and SNAPE's inspection findings.

The IESC visited the nearest well¹⁶ and visually inspected the water from the tap; the water was found to be clear ([Appendix 2](#), Photos 15 and 16).

The first concern refers to an issue which the IESC has previously reported on high turbidity levels in a stream, originating from springs close to the Parawi stockpile. To this date, attempts to reduce the turbidity levels through construction of settling ponds downstream of the Parawi stockpile have

¹⁶ Four wells are available to community members of Fassaly Foutabhé.

proved unsuccessful, and CBG is continuing to investigate the cause of the elevated turbidity in order to remedy the situation with the support of its shareholders (Alcoa and Rio Tinto). During the June 2023 site visit, CBG mentioned an expert from Alcoa was expected to visit the Parawi stockpile during the rainy season (most likely in August 2023) to investigate the origin of the pollution and define remediation actions. This aspect will be closely followed up during the next site visit.

Regarding the second concern, the IESC highlighted in the December 2022 report that CBG should also use its best endeavours to ensure results of the water quality monitoring are shared by SNAPE with community members. The same advice is once again made in this present report. At the time of the site visit (June 2023), the results were still not shared with the community. This is crucial as the community have expressed doubts on the water quality of the wells, thought by some villagers to be the reason why SNAPE of CBG do not share the results with them. Some villagers also mentioned they use the water from Fassalywol stream for drinking purposes in the meantime, although the stream is known to be polluted by sediments. Some villagers also remember vividly the advice from SNAPE not to use the wells, although that advice was given in the context of non-functioning iron removal devices at the wells (see December 2022 report, which item on this topic remains opened). During the June 2023 site visit, the iron removal devices were reported by the population to be all functioning (except for the well near the Fassalywol stream which pump does not work) and the number of wells was deemed satisfying. Moreover, some community members reported they use the boreholes and are satisfied. *Post visit note: During finalisation of this report the IESC has been informed that water quality results have since been shared with the community. The IESC will revisit this issue and verify results have been shared during the next site visit.*

Regarding the third concern, the Community members informed that SNAPE technicians do not visit the boreholes regularly, and SNAPE's schedule for borehole inspection is not being communicated to them. It is recommended that a CBG liaises closely with the community and SNAPE and works on increasing the communication of SNAPE boreholes monitoring with the communities. As mentioned in the December 2022 IESC report, it is also recommended that CBG representative is present when the SNAPE technicians undertake maintenance/repair or sampling from wells in Fassaly Foutabhé. The IESC advises CBG to monitor SNAPE work on the boreholes and report it in the AMR. It is therefore recommended that CBG liaises closely with the community and SNAPE during further investigations and remedial works and that CBG retain responsibility for ensuring that the Fassaly Foutabhé affected community is assured of access to clean water.

CBG drinking water treatment plants

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

The last water monitoring results shared by CBG following the June 2023 site visit show high aluminium concentrations in the water produced by the Cogon and Batafong drinking water stations. The high aluminium content in the water at the Cogon station was discussed with CBG during the June 2023 site visit, and it is mentioned in IESC previous reports and CBG Water Action Plan. Following the related action in the Water Action Plan and since the December 2022 site visit, CBG received equipment at Cogon station to fine tune the coagulant dose used to reduce the aluminium content in the water produced at the plant. If the aluminium content in the Batafong remains high and the equipment received at Cogon is useful for reduction of the aluminium content, the IESC will recommend CBG to install similar equipment at the station to ensure compliance.

8.3.5 Domestic wastewater quality

The wastewater from the Kamsar wastewater treatment plant is reused for the dust management on the CBG site. Following the June 2023 site visit, CBG has provided the wastewater quality results. However, although all parameters in the communicated results comply with the thresholds, the information on the total coliforms results in the Kamsar wastewater is missing. The same observation is made for the Sangarédi wastewater (although this wastewater is not reused but instead flows to the environment). As the Kamsar wastewater is reused, it is crucial to show the total coliforms in the sampling results.

8.3.6 Sludge management

The sludge from the wastewater treatment plants (such as from the Sangarédi WWTP see section below) are dried then disposed used at the site's rehabilitation areas. However, a procedure for the disposal of the sludge has not been developed yet. This must be developed before another sludge is disposed. The procedure can be based on the process followed for the disposal of the Sangarédi Wastewater Treatment Plant (WWTP) sludge.

8.3.7 Status of other IESC findings made in the December 2022 monitoring report

Poor performance of the UV treatment system recently installed at the Sangarédi WWTP.

CBG has informed that the treatment system has insufficient capacity to treat the volumes of water received. Procurement of a large replacement UV unit is ongoing (reception of equipment expected in August 2023). The results for total coliforms were not communicated following the June 2023 site visit (see observation in section 8.3.7).

Removal of sludge from Sangarédi WWTP

Sludge has been analysed and confirmed as non-toxic (does not contain heavy metals). The sludge has been dried at the waste facility in Sangarédi and reused in CBG rehabilitated areas.

Elevated levels of contaminants (COD and suspended sediments) found in surface river water surrounding the Kamsar processing facility

CBG has attributed any contamination of the river from CBG facilities to be a result of contamination in surface water drains. An upgrade of the surface water drainage network and improved separation of clean surface water and contaminated/process water is identified as a corrective action. See Section 8.3.2, Surface Water Drainage, Kamsar.

Bypass of the Kamsar WWTP

The IESC reported in the October 2021 Monitoring Report that discharge of untreated sanitary wastewater via an emergency overflow at the Kamsar WWTP was the result of rainwater ingress via damaged parts of the sewage collection network that was overwhelming the designed capacity of the WWTP. In order to prevent further rain induced overflow events, a programme of inspection and repair was initiated for the sewage collection network feeding the Kamsar WWTP.

At the time of the June 2023 site visit, mapping of the sewage network in Kamar City has been completed and damaged components allowing ingress of rainwater had been identified and corrective actions taken. In the meantime, a project to install a flow meter at the discharge is in progress although not commissioned. CBG is also the constructing a third treatment module (1,200m³ capacity) at the existing sewage treatment plant, significantly increasing capacity and minimising the need for rain fed effluents to bypass the WWTP.

Recalibration of the Hydro/Groundwater Balance Model

Progress has been made since October 2021 IESC Monitoring Report. CBG has appointed ERM and SRK to undertake the work, and the study is currently ongoing. Update on this item and information on the timeline for this action will be required during the next site visit.

8.4 Waste Management

An inspection of waste management facilities in Kamsar and Sangarédi was made. This was supplemented with office-based meetings in which the Waste Champion and Sponsor participated.

CBG continues to generate industrial and domestic waste which are managed in accordance with a Waste Management Plan at locations in Kamsar (primarily Tora Bora) and Sangarédi. CBG operates waste facilities in Sangarédi and Kamsar. For the latter, two areas are used for the storage of municipal (primarily non-hazardous) and hazardous wastes. In Sangarédi, the waste facility includes both hazardous and non-hazardous waste. A number of positive developments have been observed during the June 2023 site visit. These are discussed below.

8.4.1 Kamsar (non-hazardous waste facility at Tora Bora)

The Tora Bora facility, located within the CBG Kamsar area, was visited in March 2022, in December 2022, and in June 2023. In addition to the improvements observed in December 2022, noteworthy improvements have been observed during the June 2023 site visit:

- The two incinerators at Tora Bora were both operational at the time of the visit;
- The Tora Bora facility is entirely fenced with security guards 24/7;
- Drainage for stormwater management has been installed (and stormwaters are collected by trucks and treated at the WWTP);
- The historical waste dump has been covered with a fire-proofing tarpaulin;
- The green waste is composted, and the compost is used on rehabilitated areas;

As an overall observation, record-keeping and general waste management practices were good.

During the site visit, the CBG team has shown the plastic-based bricks produced from plastic wastes. Although the IESC encourages CBG to further investigate recycling and reuse opportunities, it must be reminded here that waste production prevention comes first in the waste management hierarchy. For plastic waste, it is therefore suggested that CBG substitutes single use plastics (i.e. plastic bottles) by solutions generating lower waste volumes (i.e. water fountains).

The domestic waste management procedure and the industrial waste management procedure (both dated April 2023) were shared by CBG and reviewed by the IESC following the site visit. The domestic waste management procedure describes the different domestic waste streams produced at CBG, the roles and responsibilities for handling the waste, and other important information. However, the IESC notices that the procedure is missing the waste management hierarchy chosen for each waste stream (reuse, recycling, elimination through for instance incineration), the location and method used for waste segregation, handling and elimination. Also, the procedure is missing links to other existing procedures relating to domestic waste (for instance on waste sorting, incineration process, ashes reuse etc). This will need to be developed in more details.

8.4.2 Kamsar (hazardous waste facility)

CBG also operates a hazardous waste facility. This facility was originally used as a temporary site for wastes from the Expansion Project but has remained in use for hazardous wastes for several years. The IESC has reported a number of findings for this site relating to its unsuitability of this non engineered site in previous monitoring reports. Since, CBG has started the rehabilitation of the facility, taking into consideration the comments from the IESC. During the June 2023 site visit, construction works at the facility were ongoing. Completion of the works are expected in November 2023. The site is planned to incorporate the following enhancements:

- Segregation of the wastes by waste type (wood, tires, used filters etc) and the different waste types will be separated by walls;
- Waste will be covered (protected from the rain) and placed on a concrete slab;
- In addition, liquid wastes will be placed on secondary containment.

In the meanwhile, the hazardous waste is stored in 20 containers nearby.

8.4.3 Storage of waste in other areas

At the time of the June 2023 site visit, the IESC has not observed other storage of waste in other areas, and the oily waste stored in 200 litre drums adjacent to the old oil water separator has been cleared following the December 2022 site visit.

8.4.4 Sangarédi

A visit was also made to the waste facility at Sangarédi. The site was under rehabilitation, with the aim to duplicate the Kamsar hazardous waste facility and domestic waste facilities. The deadline for the upgrading works is November 2023. Similarly, to Kamsar hazardous waste facility, the waste is stored in containers while waiting for the construction completion. The IESC will revisit the finalized facility during the next monitoring visit.

8.4.5 Status of other IESC findings made in the December 2022 monitoring report

Waste Management Plan

The IESC reiterates its earlier findings that the Waste Management plan does not reflect CBG's current waste management practices with several good initiatives that are not considered in the WMP. The WMP requires a full update to reflect current thinking and strategy around waste management and the longer term (plus 5 year) strategy. Further updates will be required as the strategy evolves, but this should not delay an immediate update of the plan (see [Appendix 2](#), Issue ref. Oct 2021_025).

Waste long-term waste strategy

The Waste Management Committee (WMC) with a new structure since October 2022 comprises of members from HSECQ team, other CBG functions and includes the Operations Director. Part of the WMC's mandate is to produce a waste management policy that will be underpinned by a long-term waste strategy (noting the current waste management plan is limited to the short/mid-term). The long-term waste strategy is still waited for. This point is captured in the finding Oct 2021_025 listed in Appendix 3.

8.5 Air Quality

CBG developed an Air Quality Management Plan (AQMP) in early 2019 which included an action plan (a list of management actions). The AQMP and original action plan have been supplemented with a Corrective Action Plan that was developed to close out ESAP#13 concerning the development of bespoke stack emission limits for the Project. The site visit in June 2023 was supplemented by another site visit two weeks later focussing on the air quality aspects, subject to a separate memo. Therefore, the June 2023 site visit did not investigate the air quality in too much detail, however a general status update against the air quality actions plans/key actions therein is provided below.

8.5.1 Status of AQMP Implementation.

The Figure below provides a graphical summary of the status of implementation for the Action Plan that is embedded within the Air Quality Management Plan (AQMP). The graphic shows the planned timeline for completion of all the actions as per the overarching schedule defined in the Road Map (ESAP Item 1). The Figure is an update of the road map presented during the December 2022 site visit and shows a significant reduction in the gap between planned and actual progress since the last site visit.

The improvements performed since December 2022 include, *inter alia*:

- IEC (an air quality consultancy supporting CBG) report [insert title of report] on Kamsar site’s air quality
- External audit on the dryers (by Saacke);
- Internal audit on fugitive emissions at the site (with Alcoa support);
- Iso-kinetic measurements of stack emissions carried out during the dry season in May 2023;
- Purchase of new equipment for the NOx and SOx monitoring at the Kamsar permanent station (Air Quality Monitoring Station – AQMS), as well as a meteorological station.

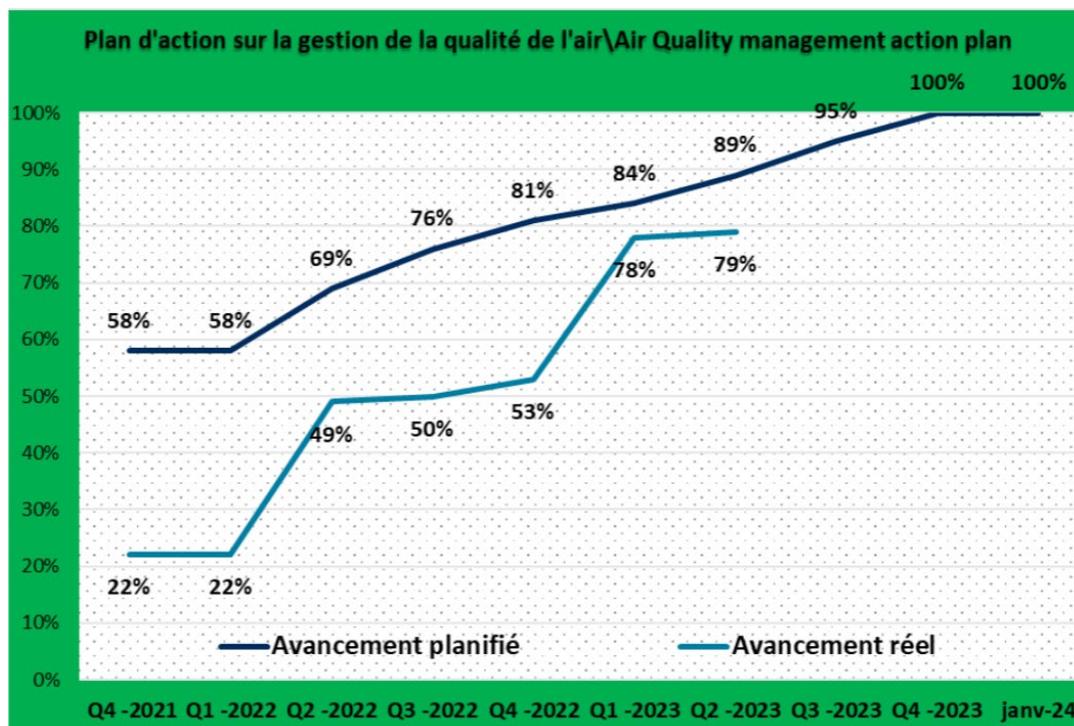


Figure 8-3: Status of AQMP implementation

In preceding Monitoring Reports, the IESC reported on: i) Stack emission monitoring and finalisation of the AQMP; ii) ambient air quality monitoring; and iii) dust suppression. These remain key issues are revisited in this report with status updates below.

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

The Air Quality Management Plan (AQMP) prepared in January 2019 did not specify stack emission criteria for the dryer stacks in Kamsar. An agreement was made between CBG and Policy Lenders to revise the AQMP based on stack emission limits that were to be derived and then agreed with the Policy Lenders. However, additional modelling has since demonstrated that reducing emissions from the dryer stacks in isolation would not result in the desired ambient air quality (AAQ) improvements. CBG has therefore adopted a more holistic approach to improving AAQ, in which the improved emission from the dryers are just one component of the approach. The new approach has the support of the IESC and Policy Lenders. At the time of writing this report, CBG is finalising corrective actions plans intended to improve AAQ and has already initiated a number of corrective actions. Some of these are described below.

Since December 2022, CBG has worked on fugitive emissions at the Kamsar site with Alcoa support, identified the sources of fugitive emissions and works on the airtightness at bauxite transfer points and/or dust management (water spray) in Kamsar.

CBG also mandated an external consultant (Saacke) to perform an audit on the 4 dryers (started in November 2022), which resulted in a long list of corrective actions to improve the operation of the dryers, including a large number that would result in improved dryer stack emissions.

Regarding the emission of NO_x and SO_x, the main sources are the power stations. CBG has contacted Caterpillar to send a team to audit the generators at Kamsar (audit planned for July 2023), following which CBG will produce an action plan to reduce the production of NO_x and SO_x.

8.5.3 Air Quality Monitoring

The IESC previously reported malfunctioning equipment was preventing collection of ambient air quality data from the Kamsar air quality monitoring station. The monitoring equipment has since been repaired (see December 2022 report) for particulates, however the connection of the SO₂ and NO₂ equipment isn't working and needs fixing. CBG has purchased new SO₂ and NO₂ sensors and informed this is expected to be fixed in 2023.

Monitoring also continues at various Project sites (communities and along the railway) using portable monitoring equipment to measure concentrations of airborne particulates, and passive samplers to measure NO₂ and SO₂.

8.6 Noise and Vibration

8.6.1 General

Noise and vibration monitoring programmes are being executed to plan without major difficulties since the December 2022 site visit. CBG continues the implementation its noise and vibration Action Plan (included within the N&V management plan). The Figure below provides actual progress (light blue line) against planned progress (dark blue line). Although the metrics (number of actions completed) are a relatively crude measure of effort and progress, the graph shows actual progress to be catching up with planned progress and it is still possible all actions to be complete by Jan 2024 (the target date specified in ESAP #1) however no progress was made from Q1 to Q2 2023.

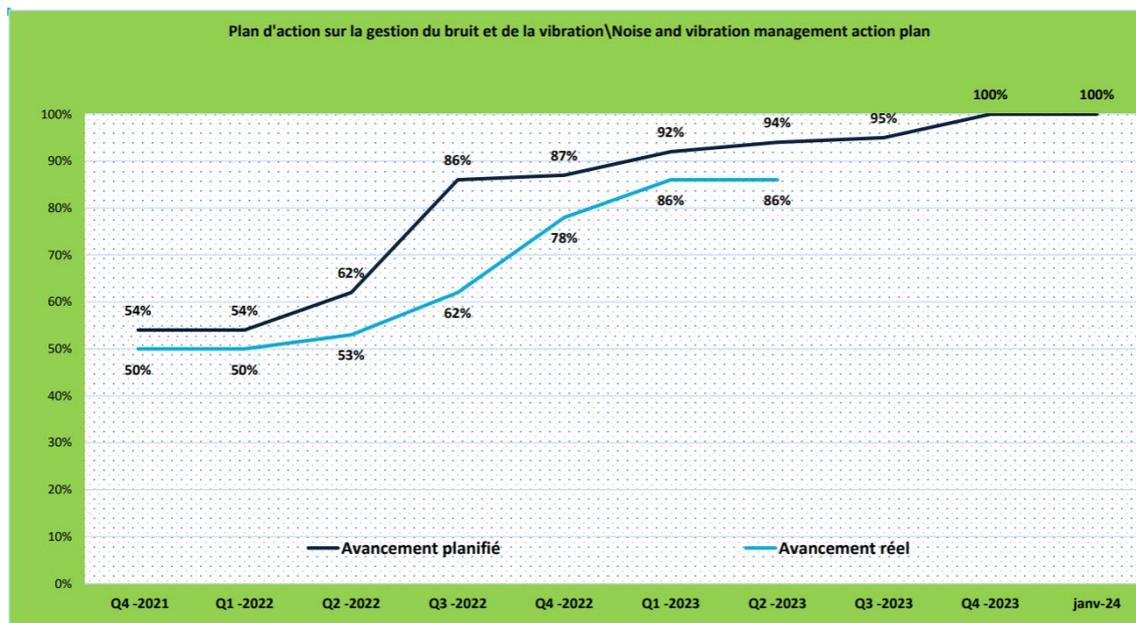


Figure 8-4: Implementation of N&V Action Plan - actual progress compared with planned schedule

8.6.2 Noise monitoring along the railway

One of the key recommendations made by the IESC 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 in the future. This activity was previously reported to be delayed in October 2021 and was highlighted as a key action for 2022. The December 2022 IESC report mentions that preliminary mapping, using satellite imagery has commenced and will be verified by in-field mapping of sensitive receptors. In June 2023, the mapping is still ongoing.

The monitoring programme for sensitive receptors along the railway is ongoing and additional new sites have been identified and are currently being monitored. There are currently 11 sites monitored for baseline collection (instead of 3 originally). Following the IESC recommendation on noise mitigation measures, CBG undertook, through a consultant, to update the study made by Englobe with the data acquired during certain noise measurement campaigns at the level of the rails and to reassess the effectiveness of the proposed mitigation measures. In addition to the above, reforestation works are planned (campaign expected to start soon after the June 2023 site visit) in the villages mostly affected by the multi user railway to reduce noise emissions.

The results of noise monitoring campaign (taken in February, March and April 2023) at residential locations along the railway, in Sangarédi and Kamsar show non-compliant noise values:

- During both day and night at Teliboffy and Parawol Malassi in Sangarédi, and in all monitored locations in Kamsar (sortie nord de l'usine, Kastrie, Sous-préfecture, Madina Carrefour, Diassia, Aéroport Kamsar Kawass, Ecole de Kamsar).
- During the day in Horé Lafou in Sangarédi,
- During the night in Pora PK130 in Sangarédi,

In the view of these results, the IESC recommends CBG to investigate the part of CBG operations in these noise measurements, develop a plan listing all sensitive receptors most impacted by CBG operations, list the mitigation measures installed and update on these measures following the update of the study made by Englobe.

Following the IESC recommendation to repair or replace malfunctioning noise monitoring equipment, CBG informed during the June 2023 site visit that the equipment is operational and others are being calibrated and maintained.

8.6.3 Use of surface miners

The status for the use of surface miners is unchanged since the December 2022 site visit. Refer to the issues in Appendix 3 for information on this aspect.

8.6.4 Noise Monitoring Mine Site

CBG continues to monitor noise from active mining areas, including noise generated during both blasting events and general mining activities. As previously reported, a noise monitoring campaign has been dedicated to the village of Fassaly Foutabhe. Focused attention was given to Fassaly Foutabhé because of its location and proximity to multiple noise generating activities (COBAD Road, mining areas to the north and South and the Parawi stockpile area). During the October 2022 noise monitoring campaign, night-time noise limits were exceeded with noise levels seemingly increasing during the night. CBG has investigated the non-compliance and noticed two surface miners (on the blocks of M' bourorè and Parawi 2a) working simultaneously. As a corrective action, a surface miner was moved to another mining area. This measure reportedly resulted in satisfactory results at Fassaly Foutabhé shown in the Q1_2023 noise measurement campaign (in accordance with the IFC EHS guidelines).

This observation refers to the cumulative noise levels discussed in the previous sub section.

8.6.5 Airblast overpressure

Airblast overpressure is monitoring by CBG and assessed against applicable project standards (AZNEC limits). In the December 2022 site visit report, the IESC reported a few exceedances, relatively small (in comparison to earlier exceedances reported in 2021) with three exceedances out of ninety measurements taken (this number equated approximately 3%, noting the standard allows for up to 5% exceedances).

Since October 2022, there has been no exceedance of airblast overpressure. This result is visible following the implementation of new stemming¹⁷ techniques, and the cessation of blasting at distances of between 500m to 1,000m from the sensitive receptors.

¹⁷ 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.

8.7 Resource Use and Energy Efficiency

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.

Progress in the implementation of the RUEEMP Action Plan was not included in the scope of the June 2023 site visit, but instead will be a focus for attention in subsequent site visits and review of the 2022 Annual Monitoring Report that is due in April 2023. In particular, the IESC will focus on the reporting of Scope 1 and 2 GHG emissions, normalised against bauxite production volumes and transportation of bauxite, recognising CBG was developing a new methodology for GHG emissions calculations when this issue was last discussed.

8.8 Soils

The soils polluted by hydrocarbons are going through a bioremediation process, described in a procedure shared with the IESC following the June site visit 2023. The process allows a reduction of the hydrocarbons below 100 mg/kg, after which the remediated soils are reused on rehabilitated land. The sampling method is reportedly comparable to USEPA SW 846 8015D.

The ashes resulting from the incineration of the domestic waste in Kamsar are considered non-hazardous by CBG and are currently reused in remediation activities. However, the waste from which the ashes are produced are not currently listed in the existing domestic waste management procedure. This will need to be captured in the domestic waste management procedure such that the suitability of incinerator ash for reuse can be confirmed.

Table 8-1: Summary of Findings, PS3

ID	Aspect	Issue Description	IESC Recommendation	Significance
June 2023 _ 014	Air quality monitoring	The IESC previously reported malfunctioning equipment was preventing collection of ambient air quality data from the Kamsar air quality monitoring station. The monitoring equipment has since been repaired (see December 2022 report), however the connection of the SOx and NOx equipment isn't working and needs fixing. CBG has purchased new SOx and NOx equipments and informed this is expected to be fixed in December 2023.	Follow up closely on the delivery of the SOx and NOx equipment. Ensure prompt installation of the equipment following their reception	Minor
June 2023 _ 015	Water usage and wastewater production at Kamsar plant	The water flow processed by the OWS was not known as upstream uses as these were not measured in a systematic way. There is currently no plan to reuse the industrial wastewater from the OWS unit.	It is recommended to install water meters at the main contributors to wastewater production (locomotives cleaning station, and power station). This will help CBG to further understand water consumption on site, and draft water saving strategies.	Minor
June 2023 _ 016a	Communities' water resources	During the June 2023 site visit, it was difficult for the CBG representatives to communicate on the exact number of boreholes funded by CBG. Moreover, as CBG is not responsible for their monitoring, the boreholes do not show on the monitoring map and their water quality results were not communicated. The results from SNAPE's study on water needs in 50 villages in the mine weren't shared with the IESC for review.	Although CBG is not responsible for maintenance of the boreholes, it is important CBG ensures strong liaison with SNAPE to be informed on the water quality at the boreholes within the affected communities (for instance as part of the "Comité de gestion des forages" or wells committee). This will enhance CBG knowledge of the boreholes (water quality, condition etc.) and will ensure a prompt response from CBG in case the boreholes do not operate as expected (due to CBG operations' impact the water resource or lack of maintenance). It is required CBG provides an update on this point before the next site visit. As a matter of priority, CBG needs to develop a communication protocol with SNAPE regarding Communities' water resources monitoring.	High

ID	Aspect	Issue Description	IESC Recommendation	Significance
			Communication protocol must include a CBG point of contact.	
June 2023 _016b	Communities' water resources	Communities can be affected by CBG mine operations if their water resources (surface water or groundwater) are impacted by CBG mine operations. It is difficult to for the IESC (and possible for CBG itself) to apprehend CBG's impacts on water resources (both groundwater and surface water) with the information currently available.	In this context, the IESC recommends CBG to perform an impact assessment of the mine activity on water resources as well as a cumulative impact study on aspect. CBG should therefore prioritise recalibration and then use of its water balance model (as described in the Water Management Plan).	High
June 2023 _017	Domestic wastewater quality	The domestic wastewater from the Kamsar plant is reused for the dust management on the CBG site. Following the June 2023 site visit, CBG has provided the wastewater quality results. However, although all parameters in the communicated results comply with the thresholds, information on the total coliforms in the Kamsar wastewater were not provided. The same observation is made for the Sangarédi wastewater (although this wastewater is not reused but instead flows to the environment).	It is crucial to show the total coliforms in the sampling results. This is especially important in Kamsar domestic wastewater as it is reused	Moderate
June 2023 _018	Sludge management	The sludge from the wastewater treatment plants (such as from the Sangarédi WWTP) are dried then disposed used for the disposed at the site's rehabilitation areas. However, a procedure for the disposal of the sludge has not been developed yet.	A procedure for the disposal of the sludge must be developed before another sludge is disposed. The procedure can be based on the process followed for the disposal of the Sangarédi Wastewater Treatment Plant (WWTP) sludge.	Moderate
June 2023 _019	Surface water discharge - Kamsar	The drainage system for the surface water and stormwater at the Kamsar site showed high sediment and oil concentrations in the past.	An engineering solution such as the installation of sediment traps at outlets must be found to effectively reduce the suspended sediments in the effluents.	Moderate

ID	Aspect	Issue Description	IESC Recommendation	Significance
		<p>To resolve the issue CBG undertakes a few actions, among which the cleaning of the surface water drains on a regular basis. However, the IESC fears the cleaning activities would potentially resuspend settled sediments, thus not reducing the suspended sediments at the outlets.</p>		
<p>June 2023 _020</p>	<p>Waste management hierarchy</p>	<p>During the site visit, the CBG team has shown the plastic-based bricks produced from plastic wastes.</p> <p>Although the IESC encourages CBG to further investigate recycling and reuse opportunities, it must be reminded here that waste production prevention comes first in the waste management hierarchy.</p>	<p>For plastic waste, it is therefore suggested that CBG substitutes single use plastics (i.e. plastic bottles) by solutions generating lower waste volumes (i.e. water fountains).</p>	<p>Minor</p>
<p>June 2023 _021</p>	<p>Waste management procedure</p>	<p>The domestic waste management procedure and the industrial waste management procedure (both dated April 2023) were shared by CBG and reviewed by the IESC following the site visit. The IESC notices that the procedure is missing the waste management hierarchy chosen for each waste stream (reuse, recycling, elimination through for instance incineration), the location and method used for waste segregation, handling and elimination. Also, the procedure is missing links to other existing procedures relating to domestic waste (for instance on waste sorting, incineration process, ashes reuse etc)</p>	<p>The domestic waste management procedure needs to include the waste management hierarchy chosen for each waste stream (reuse, recycling, elimination through for instance incineration), the location and method used for waste segregation, handling and elimination; and the link to existing procedures relating to domestic waste management.</p> <p>The waste incinerated will need to be identified in the domestic waste management procedure, as the ashes produced by the incineration are reused in remediation activities.</p>	<p>Moderate</p>
<p>June 2023 _022</p>	<p>Noise at sensitive locations</p>	<p>The results of noise monitoring campaign at some residential locations along the railway, in Sangarédi and Kamsar show non-compliant noise values.</p>	<p>In the view of these results, the IESC recommends CBG to investigate the part of CBG operations in these noise measurements, develop a plan listing all sensitive receptors most impacted by CBG operations, list the</p>	<p>Moderate</p>

ID	Aspect	Issue Description	IESC Recommendation	Significance
			mitigation measures installed and update on these measures following the update of the study made by Englobe.	

Certain findings from early IESC monitoring visits are yet to be closed. These 'open' legacy findings are provided in [Appendix 3](#) of this report.

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

9.1 Communicable Disease Prevention

As already reported in the previous monitoring report (December 2022), CBG's CHSMP includes specific actions to minimize the potential for community exposure to vector-borne and communicable diseases such as the implementation of malaria and HIV and AIDS programmes. While implementation of measures to prevent COVID-19 and Ebola are reported to be ongoing (i.e. continuous action), according to the material shared for review, progress has been made in relation to the malaria and HIV/AIDS programmes which are reported in the following sections. Progress made on these programmes will be further assessed in the next monitoring visit.

9.1.1 Malaria

Two framework agreements have been established between CBG and the ONGs CEFACAM (Centre d'Encadrement et de Formation Ami Camara) and FMG (Fraternité médicale de Guinée) to carry on the malaria programme. Specifically:

- The agreement with FMG was signed on March 30, 2023, with the goal of conducting a study to assess the knowledge, skills and practices of communities in fighting malaria. The agreement has 1-year duration with the possibility to renew it for another year in case of positive results. Based on the agreement, activities must be rolled out in 4 months, according to a schedule which should be agreed between the parties. The activities are planned to start on April 11 and end on August 3, 2023, based on the schedule presented in the Scoping note.
- CEFACAM will specifically focus on awareness-raising and distribution of treated-mosquito nets in Kamsar, Sangarédi and Daramagnaki and to public health facilities. The agreement was signed on February 14, 2023 for 1 year with the possibility to renew it for another year in case of positive results. Based on the agreement, activities must be rolled out in 5 months, according to a schedule which should be agreed between the parties although it has not been shared for review.

The IESC understands that activities have started in May 2023, though an overall planning of the activities has not been provided to understand interrelations. Based on the material provided for review, KPIs foreseen to monitor programme implementation will be available in Q3-2023.

9.1.2 HIV and AIDS

A framework agreement has been signed between CBG and the NGO CEFAD (Centre de Formation et Appui au Développement) for the implementation of an HIV/AIDS programme in the communities of Kamsar, Kolaboui, Boké, Sangarédi, and Daramagnaki.

The agreement was signed on February 14, 2023 for 1 year with the possibility to renew it for another year in case of positive results. Based on the agreement, activities must be rolled out in 6 weeks, according to a schedule which should be agreed between the parties.

Based on the material provided for review, KPIs foreseen to monitor programme implementation will be available in Q3-2023.

9.2 Community drinking water

Considerations for the community's water resources (usage, quality etc) are provided in section 8.3.4.

9.3 Rail and Community Health and Safety

During the June 2023 site visit, the IESC understood that the installation of a permanent signalization system has experienced some delays and the temporary signalling system will remain operational until December 2023.

As part of the soft measures of the MUOA Transitional Measures Plan, CBG reports, through the material shared for review, to continue undertaking the following regularly:

- (#6) Involve the resource persons of the Communities to facilitate the acceptance of transitional measures
- (#7) Strengthen the awareness of urban, semi-urban and rural communities on Railway Safety
- (#8) Train raise awareness, Retrain the staff of the SOTRAC service provider ("Piquet men", barrier guards, switchers, escort vehicles)
- (#10) Associate the MU Committee with the various transitional measures
- (#12) Strengthen the monitoring of pedestrian crossings on bridges crossing the railway line

In particular, the following 13 community awareness campaigns on railway safety operations and the related risks and impacts were conducted on the issue of railway safety in 2023:

- 2 community awareness meetings organized in the villages of Thiankounrail and Boundoulengué, in Tanéné.
- 2 community awareness meetings organized in the schools of Dabayaand Correrah, in Boké.
- 3 community awareness meetings organized in the villages of Kiaye, Tambony, and Ramballai, in Kolaboui.
- 4 community awareness meetings organized in Filima, Port Néné, Madina Borbof, Municipality and sub-prefecture in Kamsar.
- 2 community awareness in Madina kébégn, and Dacountou, UC Boké.

More broadly, CBG has undertaken, in addition of the already mentioned reminders of CBG's grievance redress mechanism (49 community meetings, as already reported in section 6.3.2), 38 awareness-raising on CBG radio about COVID-19, general health and safety, in French and local languages; and 22 community safety awareness campaigns were conducted as of April 30, 2023. All data are as of April 30, 2023.

CBG also provided the following training to SOTRAC staff from January to May 2023:

- Training of 178 switchers from Kamsar to Sangarédi;
- Training of 85 barrier guards from January to May 2023 from Kamsar to Sangarédi;
- Awareness raising of 121 flagmen ("Hommes piquets") from Kamsar to Sangarédi.

As part of the hard measures of the MUOA Transitional Measures Plan, the following are still under implementation:

- (#9) Improve public perception of community protection / safety (ongoing measure)
- (#14) Improve signage and public perception of community protection / safety of level crossings (planned until December 2023).
- (#15) Continue escorting trains by road vehicles to Kamsar (planned until December 2023) – which was observed by the IESC during the June 2023 site visit.
- (#17) Set up the Betafences and the "Gates" system + guards / "Piquet men" at level crossings and permanent exceptional pedestrian crossings (planned until September 2023).

The IESC understands that, in addition to community engagement already undertaken by CBG's CR team, an agreement has been signed with the NGO CEFAD to start a community communication campaign on railway safety which will be rolled out in the communities of Kamsar and Kolaboui, and will include the tasks of awareness raising on the need for behavioural change; and of capacity building. The IESC has not received the signed agreement for review nor information on the programmed schedule. However, the IESC assumes that this campaign will be deployed in the

upcoming months and expects the initiative to be complete by the next monitoring visit. CBG also reports the following additional activities undertaken in relation to railway safety:

- Improved level crossing safety by installing 24 physical barriers on the main track;
- Installation of horns at level crossings in the towns of Kamsar (5), Kolaboui (2) and Boké (01);
- 12 other horns have been ordered and will be installed at all protected crossings (same point as in December 2022);
- Reduction of train speed (from 40 km/h to 20km/h) in the urban areas of Kamsar and Kolaboui;
- Start of betafence installation work at Bingual on May 5th, 2023;
- Installation of kilometer stakes (PK) all along the main track;

The IESC notes that the order of 12 horns was already among the activities reported during the December 2022 site visit and recommends acceleration of the process.

As concerns signage improvement, during the 2023 site visit, CBG reported that a new system of signalization “sonor and luminous” is planned to be installed at the rail crossings to increase safety levels. The IESC was informed that a purchase order and technical specifications have been already issued.

As mentioned above, betafence installation has started in May 2023 in Bingual through the appointment of micro enterprises (Très Petites Entreprises (TPEs)); however, works in Kamsar and Kolaboui are on hold pending local authorities’ approval. During the June 2023 site visit, CBG informed that the parking area for trucks in Kastry (including toilettes and prayer areas) was almost finalized therefore fulfilling previous request made by the local authorities before the start of betafence installation works. Nonetheless, CBG reported local authorities’ resistance against betafencing, due to a broader lack of social acceptability of betafencing, hence the pending approval. CBG reported to have requested the National Mining Infrastructure Development Agency (ANAIM)’s intervention to resolve the issue. As social acceptability remains difficult to achieve, and the railway is observed to be crossed by pedestrians regularly, the IESC still recommends, in addition to manage community concerns related to access to basic needs through community development projects, that CBG continues engagement with communities to manage expectations and mitigate potential opposition to betafencing combined with close monitoring of community attitudes/grievances.

As already mentioned, CBG has started recording stray animal accidents along the railway in the grievance register, although requests for compensation are currently rejected in line with national regulation. As part of the material shared for review, CBG shared an Engineering Work Order dated June 12, 2023 describing that CBG’s CR team has been increasingly receiving requests in relation to the installation of betafences to avoid loss of livestock that communities are experiencing along the railway. In this Work Order, ‘the railway’ is therefore asking for the estimated costs for betafence installation in Horé Lafou, Lafou Baila, Sakidjé, Parawol Malassi, Para, Correrah et Kalinco Pey. The Work Order hasn’t been shared for privacy.

While the IESC appreciates CBG’s attention to this matter, in case the installation of betafences in the mentioned areas were feasible, the IESC recommends specific engagements with the communities to verify their acceptability and absence of E&S impacts caused by the installation. This recommendation is still valid despite the IESC’s acknowledgment of one past request from the Poora-Sakidjè community to install fences to protect the cattle victims of countless accidents (already recorded in the previous monitoring report¹⁸).

¹⁸ From the footnote already reported in Ramboll’s December 2022 monitoring report: “Such request has been classified as unacceptable by CBG due to the following reason (as included in the “Comment” column): The CBG proposed to limit the speed and to perpetuate the bell. No possibility for fences was obtained because the multiusers do not reach this village. Accidents of goats and cattle are recurrent through the CFB of the CBG which transports fuel. (...)”

In addition, the IESC deems the use of the term *doléance* in this case, be more related to reception of grievances, as rightly recorded by the CR team. On this matter, the IESC encourages CBG to continue keeping records of, investigate livestock accidents, and assess the need for initiation of a multi-user fund to be used as compensation measure (or find a different solution) as alternative approach to the current management of these grievances (as already indicated in in section 6.3.2).

Based on the presentation provided in the December 2022 site visit, a procedure for the crossing of herds during transhumance has been validated and disseminated to the communities. This has not been discussed during the June 2023 site visit, and the procedure still needs to be reviewed to further check its content.

During the June 2023 site visit, CBG reported that in addition to footbridges, 2 gates (*portillons*) are planned to be installed in proximity to a mosque and cemeteries to guarantee additional passage across the railway, also targeting the elderly, and PwDs. As the IESC understood that the introductory meeting with a local association of PwDs focus more on the role of CBG and on the explanation of the grievance redress mechanism, the IESC recommends that dedicated engagement be organized with PwDs to verify PwDs's opinion on footbridges, and the need of additional gates to respond to their needs. This is captured in Appendix 3.

Furthermore, the IESC also encourages CBG to consider the construction of dedicated pedestrian pathways (also for PwDs) at the rail crossings – also based on results of the engagement with the PwDs.

No major incidents involving community members have been reported in 2023¹⁹. Among the recorded incidents, there are the following:

- In January 2023: vandalization of 120m of signal cables supplying the guardhouse at PK 135 with repairs undertaken.
- In February 2023:
 - a fire caused by the passage of the ore train 406 (124, 109 and 128) with 150 wagons bound for Kamsar. The fire was notified to the the Sangarédi fire department by a Sotrac security guard stationed at PK102.
 - a signalman at Pk18 spotted a person in the last wagon the train, who was identified as a woman with mental health problems following consultations with the residents of Dar-Salam. The woman has been taken to the Deputy Prefect of Kolaboui.
 - a crowd of Kamankouloun residents on the track at PK13.2. According to the residents, a chimpanzee was on a palm tree about 30 m from the tracks. The prevention department had to disperse the crowd after several attempts to convince the people to walk away from the track.
- March 2023: Animal accident at pk 85.

The IESC notes inconsistency between the incident of animals recorded among the community incidents on the railroad and the number of grievances on the same matter recorded in the grievance register. This should be resolved for a more coherent monitoring of this aspect. Previous finding on requiring recording on stray animal accidents along the railroad remains open.

¹⁹ Fatality of one switchman occurred on March 28, 2023 was also presented among the recorded community incidents, which is described in section 7.8.1, being it an occupational incident.

9.4 Mining site and Community Health and Safety

During the June 2023 site visit, the IESC observed regular presence of pedestrians and vehicles at the mine (children on bicycles on a mine road for instance), despite the presence of dedicated community roads built by CBG last year. As already reported previously in other sections of the report, considering the health and safety risks associated to it, the IESC recommends that the presence of pedestrians / vehicles be included and managed within CBG's traffic Management Plan, as a matter of priority. As part of the traffic Management Plan, CBG should also consider and implement appropriate signage along the road (which is currently lacking) and controls at the mine to reduce presence of unauthorized people in CBG's operational areas. This aspect is captured in Appendix 3.

During the June 2023 site visit, the IESC was informed informally about the death of a girl on May 18th, 2022 who drowned in a sedimentation basin (basin N°4) at the Sangarédi mine site. This fatality was not reported to the IESC by CBG during the community health and safety sessions (held during each site visit). CBG reported they protected the area with concrete walls to block access to the basin as a first follow up action. Following the site visit, CBG has shared the minutes of the meeting held after the fatality. The minutes mention a number of decisions and actions aiming to address the risk of drowning:

- Raising awareness through dedicated communication campaigns (through radio, in local languages);
- Increase the security around sedimentation basins (by physical barriers);
- Apply sanctions for trespassing the physical barriers.

The document mentions the actions will be carried in synergy between CBG and the authorities. No other documentation on the fatality was communicated to the IESC. Therefore, the IESC will follow up closely on the fatality and the documentation produced thereof (minutes, reports, investigation reports) during the next monitoring visit. The IESC recommends CBG to report any type of fatality at their sites (rail, mine etc.) involving communities. This is added as an item to the table at the end of the chapter.

CBG is also required to report significant community incidents, including fatalities, to its lenders. Further investigations reveal this did not occur following the incident; the IESC understands that whereas the incident was promptly investigated by CBG and a number of corrective actions were promptly put in place, there appears to have been a breakdown in communication resulting in failure to notify lenders. The reasons for this failure, including adequacy of internal notification procedures within CBG, requires further investigation and implementation of corrective actions to ensure similar failures do not occur.

9.5 Blasting Protocol Implementation

During the December 2023 site visit, no updates on the blasting protocol implementation have been discussed or shared. Based on the review of the Borrower's E&S Certificate (Q1-2023), blasting has been discussed in the 15th CAO mediation session that took place between March 13-16, 2023 which also included 2-day field visits with representatives of CAO, CBG, communities and advisory NGOs (local and international) and SNAPE. In addition, the Borrow E&S Certificate reads as follows: *"During the two session days, the CAO provided an update on the work of the blasting expert, Social Science Solutions (SSS) who was in the field during the month of March. He met with CBG and the communities. CBG provided an update on recent community concerns related to blasting and the use of surface miners near Fassaly Foutabhé and Koobi plateau.*

The amendment to the blasting agreement was finalized by the CAO and sent between the two session days to begin the signing process. Although the expert has started his work, the CAO/CBG

contract for the blasting expert is being finalized by the CAO and will be sent as soon as possible. (...)”. The amended blasting protocol will be revisited in details during the next site visit.

Among the 2 blasting-related grievance recorded in the Grievance register appended to the Borrower E&S Certificate, 1 grievance is still open and a second one was most likely rejected, considering CBG comment that informs of the issuance of a letter to the complainant after an analysis of the grievance. Overall recommendations on grievance management are included in section 6.3.2.

9.6 Community Development

9.6.1 Updated Community Development Plan

The Community Development Plan (CDP) has been subject to an extensive revision for the period 2022-2025. CBG is currently reviewing lenders’ latest comments. 2023 Action Plan implementation is underway.

9.6.2 Implementation of the 2023 action plan.

A list of all the community development projects developed since 2017 has been shared for review. Out of 153 projects listed, the following 7 projects are recorded as non-functional:

Year	Project	Location
2016	Construction and equipping of a modern slaughterhouse in Lavage, Sangarédi center.	Sangarédi
2017	Construction of a livestock market in the Missira sector.	CU/Boké
	Construction and equipping of a youth center in the PLV sector (Bappa sergent district).	Sangarédi
	Construction of a positive borehole equipped with a human-powered pump in the Parawol sector.	Daramagnaki
	Construction and equipping of the Katakodi health post (Bendougou dump) with an improved well.	Kamsar
2018	Construction of a slaughterhouse with fencing and improved well in Kastry.	Kamsar
2021	Completion and equipping of the Kawass center youth center.	Kamsar

During the June 2023 site visit, the IESC did not discuss thoroughly the reasons underlying the status of these projects – except for boreholes - to understand if there is a common root cause. Nonetheless, the majority of the implemented community development projects appear to be functional which is considered positive.

Among all the approved community development project in 2022, the construction of an elementary school with 3 classrooms and a latrine block with 2 and 3 cubicles, plus staff accommodation in Yatia in Kolaboui is the only one still underway.

In 2023, the following 13 community projects have been selected in the communities of Boké, Téliélé and Gaoual:

- Construction and equipping of a secondary school with 4 classrooms and 2 latrine blocks with 2 and 3 cubicles in Kastri. (Kamsar)
- Construction of a 3-cabin latrine block at Kassongony 1 elementary school (Kamsar).
- Renovation and equipping of the Balandougou center health post and construction of housing for nursing staff plus 1 latrine block with 2 cubicles. (Sangerédi)
- Renovation of an elementary school with 3 classrooms plus 2 latrine blocks with 2 and 3 cubicles and housing for teaching staff plus 1 latrine block with 2 cubicles in Kankako (Bintimodia).
- Construction of 5 boreholes equipped with human-powered pumps in the villages of : Dassassa, Kegnenta, Dawafou, Taibata and Tinguilinta (Tanènè)
- Construction and equipping of a maternity ward at the Kolaboui health center.
- Construction and equipping of a health post plus 1 latrine block with 2 cubicles and housing for nursing staff plus 1 latrine block with 2 cubicles in the Sinthirou-toumbé district (Wendou Mbour).
- Construction and equipping of a building for a multi-purpose room and 2 offices in the courtyard of the Koumbia town hall.
- Completion, fitting out and equipping of a youth center (CU Gaoual)
- Construction and equipping of a health post plus 1 latrine block with 2 cubicles and housing for nursing staff plus 1 latrine block with 2 cubicles in Yaladané, Diandian district (Daramagnaki).
- Construction and equipping of a school with 3 classrooms and 2 latrine blocks with 2 and 3 cubicles, plus staff housing and 1 latrine block with 2 cubicles in Thévé, Foyé district. (Missira)
- Renovation of 2 student buildings at the Boké Higher Institute of Mining and Geology (ISMGB).

1 out of 13 community projects (i.e. Centre culturel de Corrèrah (CU Boké) has been completed and handed over, while 3 are under development.

Outside the Community Development Plan, CBG is also developing:

- 5 boreholes in Kamsar (33 boreholes project)
- Non-mediated borehole program in villages near the mine

Finally, CBG has donated didactic materials for schools in Hamdallaye, Fassaly Foutabhè, Niangaba and Parawi, linked to PARC and PAR de Kankalarè (budget amounting to USD 18.832,00)

In relation to Income Generating Activities Support Projects or Projets d'Appui aux Activités Génératrices de Revenus (PA-AGR), CBG has signed a Phase 2 memorandum of understanding with CECI (2-year contract); an operation action plan is under finalization and the Project team has been deployed in the intervention zones. Phase 2 start-up is planned in June 2023 and is scheduled for the next 2 years.

An evaluation study of the first phase of the Income Generating Activities Support Projects has been carried out by the IFC Advisory, and shared with the IESC for review which will serve as a basis and orientation for the consolidation phase. The IESC will await additional evidence of the steps undertaken by CBG to incorporate such evaluation in the planning and deployment of future initiatives. Based on the material shared for review, the IESC understands that 2 Small Medium Enterprises (SMEs or *Très Petite Entreprises* (TPE)) in the area of sanitation are in the process to be created; and that out of 14 SMEs, 11 are operational and 9 have fully repaid the amounts due to the revolving fund, and 2 SMEs are in the process of repayment.

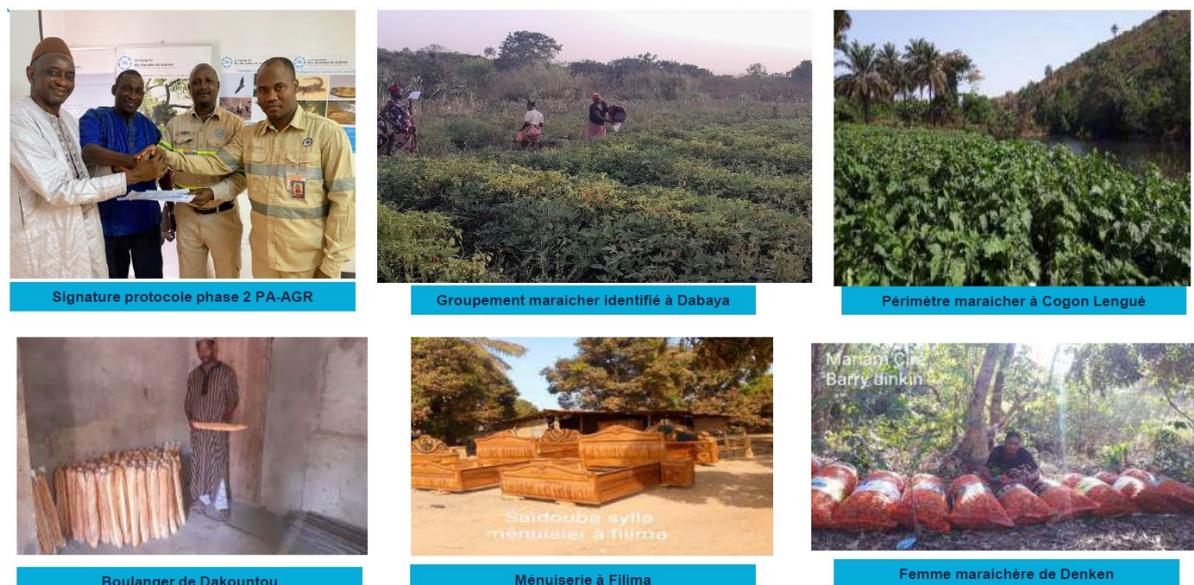


Figure 9-1. CBG's photos of PA-AGR

In addition, a new Income Generating Activities (IGAs/AGR) Programme (Phase 2 PA/AGR) is under preparation with a participatory diagnosis which has carried out in the project areas of Kamsar, Kolaboui, Sangaredi, Boké, Tanéné and Daramagnaki to identify promising sectors and identifying both individual and collective IGAs. To this end, a contract has been signed with Sylla Consulting. CBG is awaiting the draft diagnostic report.

Among the areas for improvements CBG considers:

- Deepening CBG's knowledge of the socio-economic characteristics of our area of influence through the undertaking of a baseline study and a market study of promising sectors for AGRs (activity in progress with IFC advisory);
- strengthening the theme of education (school enrolment children and young girls in rural areas) which was already among the areas for improvements reported in December 2022.
- Improving and strengthening the monitoring and evaluation system to better measure the impact of investments and achievements. For this point CBG mentions the recruitment of a specialized consultant and use of IsoMetrix (also refer to section 6.1.6 for more details on the IsoMetrix Database coordinator)

The Community Development Action Plan reports an 89% progress versus the 99% completion planned. The action not yet started pertains to the installation of infrastructure identification signs; SMEs capacity-building program; and the undertaking of the census of basic social infrastructure financed or renovated by the CBG.

Particularly in relation to the latter point, the IESC understands that the recruitment of service provider is still underway and therefore no progress appears to have been made. Previous recommendations are therefore still valid.

9.7 Influx Management

During the June 2023 site visit, the IESC did not discuss progress on the steps taken around Influx Management. Nonetheless, based on the material shared for review, CBG has shared some updates that are reported hereinafter.

9.7.1 Influx Management Plan

Based on lenders' latest feedback, the Influx Management Plan has been finalized to include target values for the foreseen KPIs. The plan has been approved by the IESC Lenders. The Influx Management Plan action plan now incorporates the impacts of the Multi-User (MU) project.

Table 9-1: Summary of Findings, PS4

ID	Aspect	Issue Description	IESC Recommendation	Significance
June 2023 _ 023	Rail and Community Health and Safety	The IESC notes that the order of 12 horns, reported in December 2022 has still not been delivered.	CBG is required to supervise / accelerate the purchase process of all the equipment related to railway safety.	Minor
June 2023 _ 024	Community Health and Safety - Railroad Safety	CBG has started recording stray animal accidents along the railway in the grievance register although requests for compensation are rejected in line with national regulation.	In addition, the IESC encourages CBG to continue keeping records of, investigate livestock accidents	Minor
June 2023 _ 025	Community Health and Safety - Railroad Safety	CBG's Engineering Work Order dated June 12, 2023 stating that CBG's CR team has been increasingly receiving doléances in relation to the installation of betafences to avoid loss of livestock that communities are experiencing along the railway in the area of Horé Lafou, Lafou Baila, Sakidjé, Parawol Malassi, Para, Correrah et Kalinco Pey.	In case betafence installation was feasible, specific engagements with the communities to verify their acceptability and absence of E&S impacts caused by the installation is required.	Moderate
June 2023 _ 026	Community Health and Safety - Railroad Safety		CBG to assess the need for initiation of a multi-user funds to be used as compensation measure (or find a different solution) as alternative approach to the current management of these grievances.	Minor
June 2023 _ 027	Community Health and Safety - Railroad Safety	Stray animal accidents are recorded as grievances and as doléances. The number of accidents involving animals along the railway needs to be consistent and managed as grievance.	CBG to keep on recording stray animal accidents along the railway consistently and as grievances.	Minor
June 2023 _ 028	Community Health and Safety – Mine site Safety	A fatality occurred on May 18th, 2022, in a sedimentation basin (reportedly N°4) at the Sangarédi mine site. This fatality was not reported to the IESC by CBG during the community health and safety sessions (held during each site visit). Following the site visit, CBG has shared the minutes of the meeting held after the fatality. No other documentation on the fatality was	Despite being an isolated failure to report, measures should be put in place to ensure there are no repeated failures to notify Lenders when community incidents occur. When a failure appears, the reasons for this failure, including adequacy of internal notification procedures within CBG	High

ID	Aspect	Issue Description	IESC Recommendation	Significance
		communicated to the IESC. On this occasion Lenders were not notified of the incident.	<p>requires further investigation and corrective actions will be implemented of to ensure failures do not repeat.</p> <p>Inspection programmes should be put in place to identify damage/vandalism of community safety measures e.g. installed fencing intended to restrict access to dangerous areas.</p>	

Certain findings from early IESC monitoring visits are yet to be closed. These 'open' legacy findings are provided in [Appendix 3](#) of this report.

10. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

10.1 Validation of the Resettlement Policy Framework and resolution of PS5 systemic issues

The status of the revised Resettlement Policy Framework (RPF) validation has not changed. It is still not finalised, and the current resettlement processes are therefore not managed in line with an agreed framework (the 2015 RPF is outdated compared to current CBG practice and the new RPF has not been signed off by the Policy Lenders). The suggested approach in the last monitoring report has failed and the specific call organised in May 2023 has not led to a deadline for the RPF validation. During the June 2023 IESC visit, CBG presented a PowerPoint showing: i) main changes accepted resulting from lenders comments (but under validation process at CBG management level as contain financial implication); and ii) key comments still to be addressed. Approximately 10 comments for which CBG either doesn't see how to operationalize them in practice or disagrees. Unfortunately, these comments couldn't be reviewed with IFC during the IESC visit for lack of time.

Resettlement can be considered as the number 1 risk for human rights abuses in a mining operation. Considering the size of the CBG land takes, it appears as a priority that CBG resettlements are managed through a clear and communicable framework policy. Moreover, several other PS5-related issues have been stalling for several years (e.g cumulative impacts, security of tenure, monitoring and adequate human resources). These issues cannot be managed by the Resettlement department only, as involving interventions of the CBG legal, finance, human resources departments as well as senior management.

The IESC therefore recommends:

- Land acquisition and Resettlement Management is integrated in the CBG roadmap, with sponsors and champions supporting the Resettlement department in tackling the systemic issues.
- All players: CBG, policy lenders and the IESC makes the best efforts to validate the RPF.

A suggested approach would be to:

1. Set a date for the organisation of a remote half-a-day to a-day workshop in September 2023
2. CBG send the RPF powerpoint presented during the IESC to policy lenders + validate internally the already approved changes, ahead of the workshop
3. Policy lenders review the presentation ahead of workshop
4. Hold the workshop with CBG resettlement team and a representative of senior management, policy lenders and the IESC
5. Close the workshop only when an agreement is found on the "key comments to be addressed" and a timeline for CBG update of the draft policy.

The long-term absence of a dedicated CBG employed Resettlement Manager, combined with a break in the resettlement specialist's contract are also critical contributing factors to the slow progress in resolving this issue (see Section 6.1.1).

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

10.2.1 Resettlement Physical Aspects

Pending works have been completed. The IESC considers that CBG has fulfilled its commitments for the infrastructure pertaining to the physical aspects of the resettlements. Some of the latest constructions (e.g. football field or additional infrastructure for the livelihood restoration activities) were managed as RAP grievances whereas they rather appear to be Community Investment requests.

The question of a completion audit for the physical aspects of the RAP or an interim audit for the entire RAP, including LRP was discussed with CBG during the IESC. The final audit is supposed to take place at the end of the LRP but as this RAP is being extended for a further 3 years (see Livelihood Restoration section), it would mean a long period of time before CBG can have an official dialogue with the Community on the closing of the physical aspects of the RAP. This closing is also linked to the security of tenure issue described in detail below.

Hamdallaye

The IESC reiterates that there is a risk of CBG being perpetually weighed down by new requests from the Hamdallaye community until the transfer of ownership and security of tenure are completed and communicated. Indeed, the transfer of ownership for the houses and the integration of the village to the management of the Commune of Sangaredi is not completed:

- There has still been no formal progress in the State-endorsed allocation of residential land at the Hamdallaye resettlement site and it is unclear how Hamdallaye territory will officially pass under the management of the Sangarédi Commune and legally remove CBG from future liabilities (e.g. road maintenance, waste management);
- The final acceptance of the houses by the PAPs is stalled until the securitisation of the residential land is completed. For the repairs, the CBG team has repeated during interactions with the community that this is the last intervention they will do with provisional acceptance on completion of the repairs and final acceptance one year later, once the land securitization process and the property transfer can be completed.

With regards to community infrastructure, the following work has been carried out since the December 2022 visit:

- Fencing of Hamdallaye school;
- Solar electrification of the school head teacher's house and the health post/midwife's house;
- Development of the interior courtyard of the health post aimed at addressing the remaining flooding phenomenon occurring in the courtyard;
- Supply and fixing of gates for the Mosque courtyard and two additional blocks of latrines of 2 cabins with 2 ablution benches at the Mosque;
- A block of latrines of 4 cabins for the Community Center and supply of equipment (chairs and tables);
- Construction of a sports field;
- Additional infrastructure were developed for the Livelihood Restoration activities: the income-generating activities (Projects managed through CECI), the 2ha pastoral land and the market gardening sites.

The IESC June 2023 visit confirmed:

- The community centre is still not operational. According to CBG, equipment for the centre arrived in April 2023 but the door was deteriorated in an act of vandalism in May 2023 by some residents of Hamdallaye. Therefore, the equipment is now stored at the village chief's house and the transfer of property is not yet effective. The Resettlement Committee on its side stated they cannot ensure the safety of infrastructure when ownership has not been officially transferred.
- The market, requested by the Community, is unused. According to CBG, the community has not given specific reasons to the non-usage of this infrastructure and appear to have found other arrangements to sell products.
- There is still no solution for solid waste management. Waste management is the responsibility of the municipality. The official hand over of the village management to the Commune of Sangaredi appears to be a necessary first step to contemplate a solution. CBG

could then assist the municipality in finding appropriate solution for waste management, as part of Community Development actions.

A question was raised by the lenders during the visit regarding the rehabilitation of the mining excavated land that adjoins the new village. The CBG team indicated they will inquire about the status of this land.

With regards to private resettlement dwellings, CBG stated that remaining house repairs (wall, door and window repairs) were conducted by contractor SIGMA in Q1 2023 in accordance with the plan presented during the December 2022 visit. The IESC could witness that the houses have been repainted. The Hamdallaye Resettlement Committee declared they were waiting for the rainy season to assess the quality of the repairs. They expressed reserve about the roof repairs with cases of roofs carried away by the wind and about the doors, with some doors off their hinges or not closing properly. They however agree that the remaining works on private dwellings are minimal. CBG indicated in a presentation that the Hamdallaye community has also asked for upgrade of interior walls, kitchen walls and community building walls though this was not raised during the meeting with the Resettlement Committee. CBG indicated that it is considering hiring a local contractor to manage potential structure issues in an acceptable timeframe until the official property handover is completed.

Fassaly Fouthabé

The following outstanding work has been completed at the date of the visit:

- The construction of a fence, two blocks of 2 latrines with ablution benches for the Almadjadja (small mosque) and supply of prayer mats;
- The construction of a mesh fence for small ruminants;
- The construction of a block of latrines of 2 cabins for the farms;
- Electrification with solar panels and furniture supply of the school head teacher's residence and Residence of the head of the health post;
- The construction of school fences;
- The market gardening site was under rehabilitation.

The Community meeting during the IESC visit was held in a notably more relaxed atmosphere than in December 2022. The village is now over-equipped compared to national standards: 4 boreholes, a health post and a school for a village with approximately 100 inhabitants (2015 RAP census). However:

- the water quality was still a community concern during the discussions held with women. Cf section 8.3.4.
- the school remains unstaffed. The last CBG attempt to get a teacher appointed has failed and the administration confirmed to them that a teacher will not be allocated for a school with less than 60 pupils. In the RAP, this school was supposed to cater for Fassaly Fouthabé and Mbouroré pupils but according to CBG, conflicts between the two villages resulted in Mbouroré parents choosing other schooling alternatives.
- The Community reiterated their request to be resettled (an official letter was sent to CBG in October 2022 and the request was expressed for the 1st time to the IESC during the December 2022 meeting) and complained that they have not received an answer from CBG yet. CBG, on its side, stated that the request was still under analysis and that they have come back to the Community to explain they will need more time to make a decision.

10.2.2 Livelihood Restoration

CBG took the decision not to continue the contract with CECI after the June 30th 2023 addendum termination date and to extend the LRP for another 3 years with a new provider. They are preparing ToR for the contract tender, which means a 3 to 6 months delay before contract is awarded (see earlier comments in Section 6.1.1 regarding forward planning to avoid gaps between termination and appointment of contractors).

To summarize the Income Generation Activities (IGAs) situation, progress was made on market gardening, poultry and Fassaly Fouthabé grasscutters activities, though questions over the sustainability of such activity remains. Despite significant new infrastructure development, the future of the bakery, small ruminants and Hamdallaye grasscutters activities are uncertain. CBG plans to ask the future contractor to make proposals for the change in model or closing and transfer of assets of the problematic IGAs; along with developing a new approach to PAP livelihood restoration.

Communities have regularly pointed out in Community meetings the non-restoration of their livelihood due to the failure of the activities. CBG had provided additional in-kind support in 2022 to cover an extension of the transitional period but wishes to avoid the repetition of such practice to limit dependency. From observation, Hamdallaye now appears as a lively village, with multiple new constructions and extensions and with new shops and services developing. However, in the absence of monitoring of the PAP livelihood status (and of the cumulative impacts with past and current landtakes), it is impossible to state that the households have restored their livelihood and especially the vulnerable PAPs.

It does not appear that a specific monitoring is taking place for the identified vulnerable households. The Community of Fassaly Fouthabé evoked the status of the CECI managed fund intended to support the vulnerable groups through targeted projects. As this fund was not used and CECI contract is ending, they expressed the request that this money is given to the vulnerable people. CBG indicated that CECI suggested to spend the fund in in-kind support which was refused by the Community.

The detailed status of the IGAs is as follows:

19. Poultry

The poultry farm has received its second batch of 1,000 chicks and the GIE members each received GNF 5 million for the 1st batch cycle production. CBG and the farms concluded a partnership for the egg supply of CBG restaurant in Sangaredi (RBQ) and CBG financed the construction of toilets on sites in Q1 2023. Meetings with both Communities reveal that they consider the project as a success. They are however requesting new poultry hangars to run two batches of hens of different age to avoid break in the production cycle. Hamdallaye GIEs is also requesting solar panels. According to CECI, they made a budget for the next batch, as part of the hand-over, that includes the support of a specialized technician. When questioning CECI about budget, the current model does not appear to be sustainable with expenses superior to sales. On a positive note, CBG indicated that they are aware of some women of the GIE in Hamdallaye assisting young people from the village in settling their own poultry farm.

20. Gardening

As announced during the December visit, CBG awarded the contract for the design and construction of the new market garden in Hamdallaye and refurbishment of the one in Fassaly Fouthabé. Construction work is in progress on sites. During the IESC meeting with the Hamdallaye Resettlement Committee, the Hamdallaye GIE representative indicated that they want the activity to re-start the soonest and without new stoppage. They are asking CBG to provide additional support until the activities, already stopped for two years, can resume.

Another Hamdallaye PAP raised the point that the land dedicated to market gardening has been lent for 5 years by the customary owners, implying that the land will have to be compensated after this period or returned.

21. Grasscutters²⁰

There is a difference of appreciation between both villages. In Hamdallaye, the first batch of grasscutters has arrived in Q1 2023 and was completed by a second batch after a high mortality rate. The activity does not seem to enthuse the GIE representative who said that the animals bite and that they are missing additional infrastructure such a pump or the pavement of the farm soil. He also indicated that CECI had committed to the delivery of 30 grasscutters whereas they only have 17. In Fassaly Fouthabé, the activity started in Q2 2022 and is ongoing without incident. Further GIE members were trained and the first grasscutters gestations have been confirmed.

22. Small ruminants & Bakery

Despite important new infrastructure investments in 2022 and Q1 2023, both activities have not resumed. During the meeting with the Hamdallaye Resettlement Committee, the small ruminants GIE representative considered it a failure with CECI not having respected its commitments: the goats delivered were not from the breed expected and some of the animals were sick, each GIE member received 3 instead of 4 goats etc. He however acknowledged efforts made by CBG regarding infrastructure.

For the Bakery, the GIE President made new request for working capital to relaunch the activity.

23. 2ha pasture land

The pasture land is not part of CECI Program but a CBG response, through a contractor, to an old grievance from herders. The construction is pending provisional acceptance of the fencing, drinking troughs, a borehole equipped with an electric solar pump, a shelter and a latrine built in Q1 2023. The planting of trees and fodder species were said to start shortly. During the site visit, CBG Resettlement Specialist noted that the design of the troughs was not appropriate, being too wide with potential consequences of animal trampling or falling. This situation raise the question of the experience or oversight of contractors.

24. Phénix²¹ LRP activities in Hamdallaye and Fassaly Fouthabé

In parallel and in both villages, PAPs impacted by other CBG Plateau landtakes entered the process of LRP implementation managed by Phénix. The situation of these LRPs is detailed in the section 10.3 LRP. In terms of perception, both Communities indicated they are for the moment satisfied with the work and approach adopted by Phénix.

Recommendations – Hamdallaye and Fassaly Fouthabé RAP

The IESC reiterates the following actions with a sense of urgency:

- bring forward the land tenure schedule to close: i) the transfer of ownership of the village to the Commune; ii) the final acceptance of the houses by the PAP; and iii) the physical aspects of the RAP in general.
- Prepare a long-term assessment of the situation of the cumulative impacts of mining and hauling around Fassaly Fouthabé, consult with the Community and the authorities and make a decision, aligned with PS1 and PS5 requirements, regarding the resettlement of the village (see also Section 10.5, Cumulative Impact).

²⁰ Grasscutters are a species of African cane rats (rodents)

²¹ Phénix is a Conakry-based consulting firm which was awarded a contract for several LRPs implementation

And adds a new one:

- Manage any new request for new infrastructure, except the ones related to RAP commitment not fulfilled or CBG impacts, as Community Investment requests, the same way such requests are handled for the other communities of CBG zone of influence.

Regarding the livelihood restoration component, the IESC welcomes CBG choice to extend the Program for 3 additional years and to change implementing partner. The recommendations for this LRP extension reiterate past recommendations of:

- Broadening the scope of livelihood restoration to more non-agricultural activities, including vocational training relevant to “urban” and mining jobs, and small business development.
- Target the youth, especially for the non-agricultural activities described above.

And includes new ones:

- Clarify the commitments and criteria of success for this LRP extension with PAPs (see also Section 10.3 LRP);
- Given the extended timeframes discussed above, the IESC recommends an external interim audit of the RAP, including LRP to i) close the physical aspect of the RAP and ii) document and assess the status of PAP livelihoods; and
- The absence of an assessment of the livelihood restoration status of the PAPs, the limited results of the CECI Program and the delay before the start of the new LRP program prompts the need for a new food interim support.

10.3 LRPs

10.3.1 Status of LRPs

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

Table 10-1: LRPs in progress

LRP name	#PAPs	LRP status	Implementation status
MUOA	255 ^[1]	Approved	On-going through Phénix
Kankalaré	474	Not approved by lenders	On-going through Phénix
Plateau Thiapikhouré	156	Not approved by lenders	On-going through Phénix
Contingency blocks	77	Not approved by lenders	On-going through Phénix
Plateau Kagneka and Parawi extension	500-800 ^[2]	Not approved by lenders	Contract signed with Phénix for implementation
Plateau Mbourore	1005	Not developed yet (on-going compensation process)	NA

^[1] This number is the number of PAP economically displaced in the MUOA RAP (which includes a total of 415 PAPs)

^[2] The exact number of PAP specific to this LRP couldn't be found in the documentation provided.

Compensation

The draft updated RPF recognizes customary land ownership and includes the payment of a land allowance. However, the RPF has not been validated yet. Therefore, only assets (crops, plantation or preparation cost in case of cleared agricultural land) have been compensated in the aforementioned LRPs. Likewise, community grazing land is not compensated in these LRPs.

The compensation register was reviewed as part of a compensation presentation in the IESC visit pack. The 2022 annual monitoring report also provides information related to 2022 compensations. Due to a lack of lack of time, a review of all the permanent land take events since the last visit

could not be done during the June visit and it remains unclear if some of the events listed at the port, rail or mine sites are included in one of the existing or in preparation LRPs (e.g mine events called: brownfield – 52 PAPS, N'dantafognè – 15 PAPS, Fassaly wol and Corridor 30KV – not yet surveyed).

Validation of the LRPs

Except for the MUOA LRP, approval by the Policy Lenders for the LRPs is pending since the end of 2021. Versions of the documents have gone back and forth between CBG, the IESC and the lenders. CBG indicated that it is waiting for the RPF finalisation to address some of the lender's comments within the outstanding LRPs. However, aligning the LRP with the updated RPF will be difficult as some of them involve land takes that took place in 2018 and 2019. Moreover, CBG decided to move on with implementation to avoid additional delays in the restoration of the livelihood of the PAPS albeit LRP were not yet validated. CBG also concluded that the LRP produced by INSUCO insisted on the socio-economic baseline but lacked a clear programme for the implementation. In practice, Phénix had to rework a diagnosis and then submitted a programme design, which is therefore different from what was presented in the draft LRPs.

For future LRPs, the next one being Mbouroré Plateau, CBG hopes to be able to reduce comments linked to LRP as they will be aligned with the updated RPF (once validated) and wishes that they include a ready for use programme. CBG has signed a one-year contract with a Guinean firm called CEMED, instead of historic partner INSUCO.

CBG also indicated that the approval of the Land Disturbance Permit (LDP) will hereafter only take place after the LRP validation.

10.3.2 LRPs implemented by Phénix

LRPs awarded to Conakry-based provider Phénix include: MUOA LRP and the merged LRP of Kankalaré, Contingency block and Plateau Thiapokhouré. The Kagnaka and Parawi LRP will be an addendum (already signed) to the existing contract between CBG and Phénix.

Phénix team now reaches 25 employees, including a database coordinator and specialized agriculture or animal husbandry technicians. There is also a good representation of women in the team. The Phénix team accompanied CBG and IESC during the LRP community meetings with Parawi, Mbouroré, Fassaly Fouthabé and Hamdallaye and for the visit of several PAPS of the MUOA LRP in Kamsar. CBG indicated that so far Phénix is complying with its monitoring contractual requirements, delivering reports on time.

The Phénix approach is individual-based with limited infrastructure investment, favouring the usage of local material and the improvement of existing techniques, plus the use of bio-pesticide for agriculture. They are not creating new activities but working with community members on the activity they are already engaged in agriculture, animal breeding, small commerce or services. As recommended in the past IESC reports, the domains of intervention have been extended to other non-agriculture activities qualified as “support to small trade jobs”; and to vocational trading with current objective to support trainings in defensive driving or heavy machinery driving.

During the diagnosis phases, Phénix has conducted a PAP vulnerability assessment based on an individual analysis of the age, disabilities, disease and marital status of the PAPS but without an established definition. As a reminder, the updated RPF will include a definition of vulnerability but is not yet validated. Another difficulty encountered by Phénix and CBG is related to the difference in the level of impacts of the land take between the PAPS and the thus the level of support to provide. Indeed, for some PAPS the impacts were limited to a few trees. Phénix presented a classification of level of impact per PAPS based on the amount of the compensation received. Phénix

and CBG however agree that such a classification may not be pertinent as the significance of the loss for a PAP depends on his/her socio-economic condition.

During community meetings and interview with PAP beneficiaries, Phénix approach and activities were assessed positively. Communities emphasize the fact that:

- they appreciate to be given a choice of activities and not being dictated choices,
- Phénix uses small local companies to build products (e.g farming tools, furniture) or small infrastructure (wells) used in LRP implementation. Some of these small businesses are PAPs.
- is reactive and open to change when something is not working (e.g an inappropriate model of barns).

Phénix message to the community is that they will provide support in several stages, proportional to the level of efforts given by the PAP. The rational being to avoid investment for activities for which the PAP would not take ownership at the end (as in Hamdallaye & Fassaly LRP) and to promote self-initiative rather than an assistantship that could jeopardize sustainable livelihood restoration. A potential stumbling block however is that it could create a bit of confusion on what PAPs are entitled to and what are limits of the LRP commitments. (e.g requests during the community meetings from PAPs for additional equipment or infrastructure answered with an explanation on the phased approach and a “we will see at next step”). This point is to be put in perspective with the non-validation of the LRPs and therefore the impossibility to disclose a final version to the PAPs.

Another point linked to the design, implementation and monitoring of the LRP is the absence of a formal community participation, through the establishment of LRP committee with PAPs representatives, for example. Phenix has a plan to develop LRP committees, but they appear to be linked to specific activities and not an overall body at LRP or village level.

Phénix has identified the following challenges for the LRP implementations:

- Migration of PAPs to Sangarédi town center (for PAPs of the merged LRP),
- Recurrent change of technical component by the PAPs (see the merged LRP section)
- Recurring requests for fencing to secure market gardening areas against wandering animals. (confirmed during Community meetings)
- Management of non-beneficiaries of the LRP;
- Management of local artisans (lack of administrative documents/time spent by Phénix assisting them).
- Seasonal displacement of PAPs

MUOA LRP

The activities started in Q1 2023 following a diagnosis phase and approval of a programme design by CBG. 255 PAPs were eligible for the MUOA but 200 enrolled in the Program, as the remaining 50 couldn't be found or identified as being on seasonal move. Some of the PAPs are resident in Conakry and are requesting an assistance in Conakry which has been denied. 29 PAPs were assessed as vulnerable by Phénix.

A few PAPs were visited during the IESC visit:

- a motorcycle garage in Kamsar, already visited in December. The garage had lost a part of his customer base following the displacement to the other side of the railway. Phénix built a light roofed structure for his workshop with a visibility sign and provides him with a toolbox, uniform and PPE. The PAP is expecting spare parts to constitute a stock, but Phénix indicated they will examine the request later.
- A small retail shop run by a woman in Kamsar. Her palm tree plantation was impacted. She declared she prefers the small commerce activity compared to agriculture. Phénix assisted her in building a light structure for her commerce and in getting a freezer.

- PAPs with small trades jobs that were offered PPE and tools: a plumber (compensated for a tree), a mason (compensated for a large market garden), an electrician (compensated for a plantation), another plumber (fruit tree plantation). All of them were already tradesmen, some of them with technician diploma and they were satisfied with Phénix intervention. Most of them made additional request for support. A driver (compensated for a market garden) received PPE and support to obtain the biometric driving licence, soon to become mandatory to obtain a driver position.
- A group of PAPs doing market gardening and rice in the outskirts of Kamsar. They obtained a technical assistant for bio-pesticide and fertilizer, tools and a motopump (shared between PAPs of the location). One PAP acknowledged that his crops were saved against a pest thanks to the Phénix technician. The group of PAP is asking for further support for buying a rototiller as they declared there are no more for rental in the areas (a Chinese company used to lease their rototiller in the past).



Motocycle garage in Kamsar



Small retail shop in Kamsar



Piment crop in the field of a PAP in the outskirts of Kamsar



Preparation of organic fertilizer in the outskirts of Kamsar

Kankalaré, Thiapikouré and Contingency blocks LRPs merged.

The three LRPs have been merged and are following the same approach as for the MUOA LRP. 756 PAPs were considered as eligible but only 641 could be found/enrolled in the Program, from which 16 PAPs were assessed as vulnerable by Phénix. The LRP implementation started in Q2 2023 after the completion of the diagnosis phase. The approach and model is similar to the MUOA LRP and during the IESC visit, some interactions took place with PAPs who had recently received tools and

equipment. The main difference with the MUOA LRP is that the most chosen activity by the PAPs is small ruminant (40%). According to Phénix, many PAPs initially believed that the Program would provide livestock. Now that they understand the support will be rather technical or linked to assistance will small infrastructure (support for stall construction), several of them are asking to change activity.

A PAP in Mbouroré indicated that she was integrated, at her request and after Phénix/CBG approval, in the Program LRP because she was impacted by another older land take event not covered by an LRP (According to the PAP, her impacted land was part of the "Aire de stockage Parawi" land take area but there is no event with such a name in the list of 2015-2021 resettlement events. It was probably processed under another name but for lack of time, this was not further investigated with CBG during the IESC visit).

Kagneka and Parawi Extension LRP

This LRP is in the process of being integrated into the current Phénix contract as an extension. The 1st asset surveys for the LRP date back February 2021 and compensation took place in Q4 2021.

10.3.3 Mbouroré LRP

As the name doesn't indicate, impact on Mbouroré village is limited. The most impacted villages are rather Guéguéré and Fassaly Fouthabé.

Asset surveys started in Q4 2022, and compensation payment has not started yet at the time of the visit. A one-year contract was recently signed with CEMED for the LRP design. SAMEC remains the contractor in charge of managing the surveys for the compensation process. During the Community Meeting in Mbouroré, a dignitary confirmed that the inventory process went well and was done with the involvement of the chef de secteur (Area Chief) and PAPs.

CBG confirmed there is no physical displacement linked to this LRP. At the early stage of the process, the mine plan was modified to exclude the resettlement of a hamlet. The other hamlet mentioned in some documents is a seasonal pastoral camp which will be the subject of a specific study when the nomads will be back on site. This study may be an opportunity to assess how transhumant pastoralists are affected by the project developments.

10.3.4 Recommendations regarding LRPs

- The delayed implementation of the Kankalaré, Thiapikouré and Kagneka LRPs (compared to the compensation date) and the potential lack of remaining agricultural land expressed by the Community justify the IESC recommendation for renewed interim support (food assistance) to the PAPs as already mentioned in the past last two IESC monitoring reports.
- Validate the pending LRPs with the lenders. Both parties need to reach an agreement to close those documents which won't be aligned with the (yet to be validated) updated RPF. The discrepancies with the new RPF will have to be treated as part of the historic land take/legacy issues. These LRPs, maybe supplemented with the Phénix Program, must be shared with the PAPs.
- Validate the vulnerability definition in the SEP and RPF so that this definition can be uniformly used between LRPs and LRP implementers. Currently, Phénix is using its own appreciation of vulnerability which may not be the same as the one used by CECI or to be used by the new Mbouroré Plateau implementer.
- Create Livelihood restoration committee at village level, in charge of monitoring the implementation of the livelihood restoration plans.
- Assess with Phénix the relevance of supporting fencing for market gardening activities. On one hand, fencing would be an important additional cost considering the number of small market gardens supported by Phénix. Plus, most of the impacted lands were not fenced.

On the other hand, if Phénix efforts to restore PAPs livelihood are jeopardized with the production being systematically destroyed (maybe linked to a higher number of animals in villages following the compensations?), fencing should be considered, maybe using traditional techniques.

- Phénix appears as doing a good job in assisting the small companies contracted to supply goods and services for the program (mainly administrative support to formalize the business, edit proper invoices etc), though time consuming and not part of their current mandate. One suggestion could be to include these small enterprises either into an Entrepreneurship Community Development Program or the capacity building component of a future local procurement program (as they are de facto tier 2 CBG suppliers).

10.4 Exploration in North Cogon

An Environmental and Social Impact notice is under development for the prospection phase and early work and the LDP process started. During this prospection phase, a feasibility study will be completed for the infrastructure and if conclusive, an Environmental and Social Impact Assessment will be conducted.

An agreement was found with the Communities for the installation of fly camps (fixed setting for the time of the campaign December to May). The temporary land take will affect 199 PAPs and 41ha of agricultural land. CBG indicates the status of the compensation process as “undergoing administrative monitoring”. The subject was not discussed during the IESC visit; therefore, it is not clear what situation this status refers to.

10.5 Cumulative Impacts

The compensation register was reviewed during the visit, but CBG prepared a presentation on compensation. The report indicates the finalization and closing of 7 compensation events in Q1 and Q2 2023, representing 118 PAPs and 48ha of agricultural land impacted. Files under processing include the Mbouroré Plateau which impact s+1000 PAPs and a total of 713ha (agricultural + grazing land).

The IESC reiterates the need to identify and assess cumulative impacts on a number of communities that was discussed in the past IESC reports. CBG indicated the status of this analysis to be in progress but not finalized. Therefore, the last report recommendation is still valid.

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

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

The IESC recommends making such an assessment on the communities that were listed as villages potentially affected by a physical resettlement by 2022 in the 2015 RPF, namely: Fassaly Fouthabé, Parawi, Guéguéré, Kagnéka, Horé Lafou, Sintiourou Kourawel, Kourawel Center, Parawol Aliou and

Parago plus adding Mbouroré to this list. If CBG human resources are not sufficient to conduct the assessment, the IESC recommends hiring consultants to perform this task.

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

Concerns were raised by the CBG team that generally limited availability of land in the area would be an issue if a new village resettlement was deemed necessary because of cumulative impacts. This situation emphasises another larger issue already raised in the March 2022 report: the footprint of CBG activities and the effort or otherwise made to minimise this footprint as per the PS1 requirement.

Until a clear assessment regarding the cumulative impacts of each of the mentioned villages can demonstrate to the contrary, the risk that livelihood restoration will not be possible for some communities is assessed as high with the consequence of community dependency on CBG for survival (through continuous food assistance), a multiplication of grievances and an increase in NGO adverse advocacy.

10.6 Grievances

Section 6.3 is dedicated to the grievance mechanism and this section 10.6 will only address grievance management performance linked to land acquisition/PS5 (categorized under Resettlement in the CBG new grievance classification). According to CBG annual monitoring report, grievances in 2022 totalled 67 but the % of grievances still opened in 2023 was unknown. In 2023 (up to April 30th), 29 grievances had been registered from which 21% had already been closed. Following a recommendation of the IESC, CBG has included a new column in the grievance register to track the time taken to resolve the grievance. The grievance register was not reviewed during the IESC visit but based on CBG presentation and discussion with the team, the 2023 resettlement grievances include:

- 14% related to infrastructure, mainly related to roof repairs issues in Hamdallaye
- 76% related to compensation, mainly the takeover of land during land stripping. This recurrent problem of land takeover was already identified, and new process put in place in an attempt to solve the problem:
 - Creation of a double cordon during land stripping operations to indicate clear limits of both the land strip and the stripped land deposit;
 - No more delimitation made at night;
 - Presence of the Community during the delimitation process;
 - Penalties for the operators in case of takeover;
 - Better coordination to ensure everyone is in possession of the latest version of the delimitation map.

This new process is implemented on the Kagneka plateau and CBG indicated that so far, they have not registered new grievances related to land takeover.

Reviewing the 2022 CBG Annual Monitoring Report, two grievances refer directly to historic land takes: one for a land take in 2006 and another one referring to a Plateau in operation for the past 40 years. The broader issue of historic land takes is discussed in the next section.

10.7 ESAP 21, historic land takes and retrocession of rehabilitated land

The ESAP #21 item consisted in a review of the resettlement events undertaken by CBG between 2016 and the adoption of the updated RPF. The ESAP # 21 deliverable is not yet approved but the draft report touches on the subject of historic landtakes. Historic landtakes can be defined as any past land take not considered as managed in compliance with IFC standards.

Two grievances on the subject were registered in 2022 and this number is expected to grow as:

- This is a general trend in the industry with civil society questioning the historic land takes of mines developed at time when international standards did not exist, and E&S practice not yet conceptualized (1900s-1970s);
- As CBG standards evolve (updated RPF), it will question the practice of past land takes compensation;
- The CAO mediation will touch on the land issue in the coming months.

Review of pre-2010 land takes are not part of the IESC mandate. However, the social risk they may represent brings the IESC to give the following advice:

- Gather available data on historic compensation and digitalise them. The Community Relations Manager indicated that CBG has always compensated assets and that files shall exist in the Legal team archives (the department that was historically in charge of compensations until the creation of the Community Relation Department at the end of 2015).
- Conduct the cumulative impact assessment (recommendation Section 10.5) to have a clear picture – through mapping - of the historic and current operations as well rehabilitation.
- Develop an internal strategy on the way to approach historic land take grievances.

This question of historic land takes is also linked to the issue of the retrocession of rehabilitated land to the community, evoked in a still open 2021 finding, the ESAP #21 draft report and of actuality as CBG is celebrating the 1000ha rehabilitated this year. The IESC understands that the situation of rehabilitated land retrocession is complex because of:

- The customary ownership status of the land was not established at individual/lineage level in the past land takes;
- The current CBG mining model makes that rehabilitated land does not mean that it won't be reopen for mining activities in the future;
- Current anarchic usage of some rehabilitated land by community and/or non-residents of the impacted community.

During the ESAP #21 report development, CBG discussed the possibility to develop temporary usage agreements with the community for specific usage of the rehabilitated zone. The development of a strategy for land retrocession is one of the action items of the Landscape Management Plan developed by the biodiversity team. The retrocession of rehabilitated land was not discussed during the June 2023 IESC visit and will be followed up during next visit. The recommendation in this regard is to establish a land retrocession strategy and procedure.

10.8 Monitoring

Monitoring is critical to assess the livelihood restoration progress and the current absence of monitoring on LRPs is tightly linked to the repeated recommendation of interim food support to PAPs. During the December 2022 site visit, CBG informed the IESC that the recruitment of dedicated Monitoring and Evaluation staff was in the final stage, which was a repeated IESC recommendation.

However, since this person has not yet taken up his/her position in June 2023, the recommendations from the October 2021 Virtual Site Visit (VSV) Report with respect to monitoring methodology remain fully applicable.

Table 10-2: Summary of Findings, PS5

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
June 2023 – 029	Resettlement systemic issues	Some critical findings have been stalling for several years (RPF update, Hamdallaye security of tenure, cumulative impact, retrocession of rehabilitated land, monitoring, LRP validations, staffing of the resettlement team). Part of these findings requires inputs and/or actions and/or approval from other CBG departments.	Operations/ Closure	Resettlement Management is integrated in the CBG roadmap, with sponsors and champions supporting the Resettlement department in tackling the high significance systemic issues. The implementation of key actions should be tracked in the same manner adopted for other management plans/actions plans already within the scope of the current Road Map.	High
June 2023 – 030	Resettlement Policy Framework (RPF)	The updated Resettlement Policy Framework (RPF), including updated compensation matrix, has been pending validation for more than two years whilst undergoing an iterative review process with the Policy Lenders.	Operations	<ul style="list-style-type: none"> • Get the approval from CBG Senior Management of the new dispositions with financial and operational impacts • Organize a workshop with Policy Lenders to review one by one the comments that are problematic until an agreement is found on the final version 	High
June 2023 - 031	Hamdallaye Resettlement Site	Land tenure is not yet secured for Hamdallaye new village with consequences of: <ul style="list-style-type: none"> • lack of land securitisation for the PAPs; • impossibility to conduct the final acceptance of the houses by the PAP; • impossibility to transfer the management of the village to the Commune (including solid waste management which was subject of a past finding); and 	Operations	CBG has developed a way to address this issue. Complete the land tenure formalization and securitization process as per schedule agreed between the CBG Resettlement and Legal teams. Given the lack of progress since December 2022 visit and the criticality increasing over time, the significance is raised at High	High

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
		<ul style="list-style-type: none"> Impossibility to close the physical aspects of the RAP 			
June 2023 – 032	Hamdallaye and Fassaly Fouthabé RAP	Some infrastructure requests from Hamdallaye and Fassaly Fouthabé have been registered as grievance (ex: soccer field, additional IGA infrastructure) whereas they were not part of CBG RAP commitments	Operations	Manage any new request for new infrastructure, except the ones related to RAP commitment not fulfilled or CBG impacts, as Community Investment requests, the same way such requests are handled for the other communities of CBG zone of influence.	Minor
June 2023 – 033	Hamdallaye and Fassaly Fouthabé RAP	The ToRs for an LRP extension are being drafted. One of the lessons learnt from CECI LRP Program and other LRP programs going on is an increasing demand for additional support not planned and a difficulty for PAPs to understand the extend of CBG commitments.	Operations	Clarify the commitments and criteria of success for the LRP extension with PAPs	Moderate
June 2023 – 034	Hamdallaye and Fassaly Fouthabé RAP	A completion audit is scheduled at the end of the RAP, including LRP. The LRP is being extended for 3-year which would postpone the completion audit whereas the physical component of the RAP is completed (except for the security of tenure) and there is an absence of formal monitoring/assessment of the current livelihood restoration status of the PAP	Operations	Consider an external interim audit of the RAP, including LRP to 1/close the physical aspect of the RAP 2/document and assess the status of PAP livelihoods	Minor
June 2023 – 035	Hamdallaye and Fassaly Fouthabé RAP	The absence of an assessment of the livelihood restoration status of the PAPs, the lack of cumulative impact assessment, the limited results of the CECI Program and the delay before the	Operations	Plan an additional interim support (food assistance) until LRP activities produce revenue for the PAPs	High

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
		new LRP program will start again justifies a new food interim support.			
June 2023 – 036	Other LRPs	The delayed implementation of the Kankalaré, Thiapikouré and Kagneka LRPs (compared to the compensation date), the potential lack of remaining agricultural land expressed by the Community (and not verifiable in the absence of a cumulative impact assessment) justify the requirement for renewed interim support (food assistance)	Operations	Plan an additional interim support (food assistance) until LRP activities produce revenue for the PAPs	High
June 2023 – 037	Other LRPs	Except the Hamdallaye and Fassaly Fouthabé RAP and MUOA LRP, none of the LRPs have been approved by lenders, though implementation have started for some of them. The documents have done multiple backs and forth between both parts without final agreement.		Validate the pending LRPs with the lenders. Both parties need to reach an agreement to close those documents which won't be aligned with the (yet to be validated) updated RPF. The discrepancies with the new RPF will have to be treated as part of the historic land take/legacy issues. These validated LRPs, maybe supplemented with the Phénix Program must be shared with the PAPs.	High
June 2023 – 038	Other LRPs	The PAPs are not participating in the monitoring and evaluation of the LRP implementation	Operations	Create Livelihood restoration committee at village level, in charge of monitoring the implementation of the livelihood restoration plans.	Moderate
June 2023 – 039	Other LRPs	Communities raised the lack of fences in market gardens with impact on livelihood restoration status	Operations	Assess with Phénix the relevance of supporting fencing for market gardening activities.	Moderate
June 2023 - 040	Other LRPs	Phénix appears as doing a good job in assisting (administrative support) the small companies contracted to supply	Operations	Include these small enterprises either into an Entrepreneurship Community Development Program or the capacity building component of a future local	Minor

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
		goods and services for the program, though time consuming and not part of their current mandate.		procurement program (as they are de facto tier 2 CBG suppliers).	
June 2023 – 041		Intentionally blank		Intentionally blank	
June 2023 – 042	Retrocession of rehabilitated land	October 2021 finding raised at the High significance level in June 2023: CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues, despite the Mine Rehabilitation and Conceptual Closure Plan (MRCCP) presenting priority actions to begin by end 2018 (with one to be completed by end 2018)		October 2021 recommendation, still valid: Work to be initiated immediately to formalize CBG’s current practice, for managing mined land rehabilitation and relinquishment, into a written procedure which includes not only key actions and responsibilities, but also standardized documents, to be signed by all parties, which record agreements reached/actions completed. This procedure to take account of the good practice guidance and/or recommendations, presented in the MRCCP, relevant to mined land rehabilitation and relinquishment	High
June 2023 – 043	Resettlement team capacity	There are important elapsed periods between contracts of consultants and service providers critical for the resettlement department (e.g Resettlement specialist, Hamdallaye and Fassaly Fouthabé LRP implementer)	Operations	Start now the procurement process of the contracts ending in December 2023	High

Certain findings from early IESC monitoring visits are yet to be closed. These ‘open’ legacy findings are provided in [Appendix 3](#) of this report.

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

11.1 Introduction

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

11.2 General Progress Update

Progress on this roadmap item is good with 92% completion compared to a target of 95% for this point in time. There are no significant outstanding items and of the three items out of the total of 60 that are yet to start, two involve updates at the start of 2024²² and one depends on the finalisation of ongoing work. This latter action, which is now overdue is establishment of the community forest landscape management program. However, the activities which must be completed prior to its completion, including agreement of the Integrated Landscape Management Plan (ILMP) with the IESC and lenders, have taken longer than expected. Of the 60 items, 54 are ones that CBG has either completed or the items are continuous in perpetuity and 3 are currently in progress. The delay associated with the overdue item is a low risk as the work is progressing.

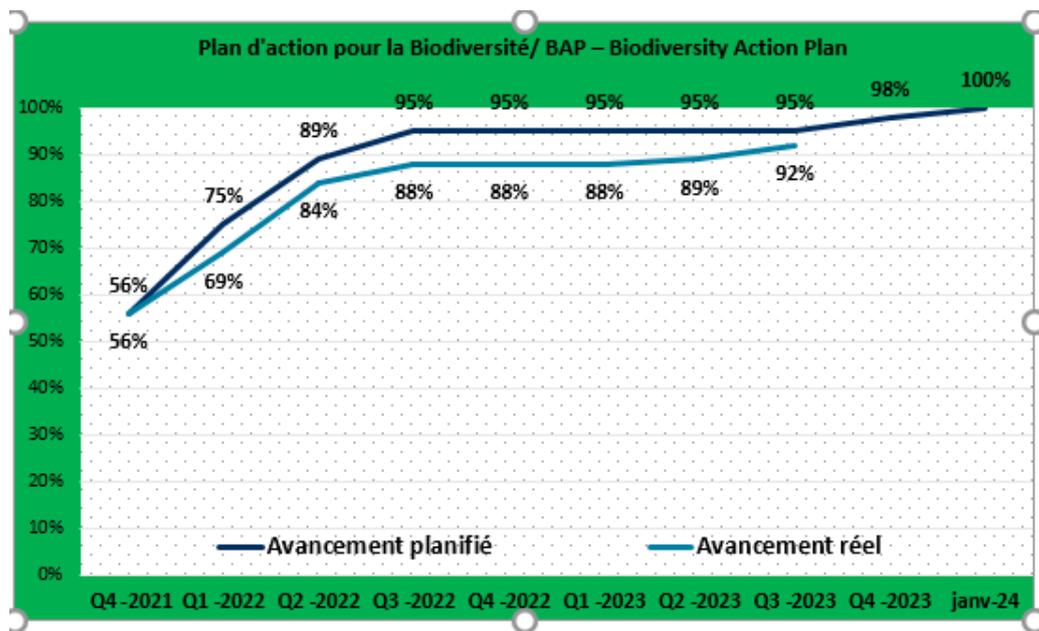


Figure 11-1: Biodiversity Roadmap Progress

11.3 Staffing and Equipment

The attendees from the CBG Biodiversity team were:

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

²² Annual updates of the BMEP and NNL/NG tracker.

As in previous visits, the team showed itself to be extremely knowledgeable on the key issues for the project with a good balance of specialisms. The proposed future structure of the biodiversity team was discussed with the IESC. It involves the promotion of one of the current team to team lead to replace the current biodiversity manager who will leave the post at the end of 2023. The vacancy created by the aforementioned promotion will be filled by a new hire to ensure that there remain four key specialists in the team each with different external contractors or junior staff reporting to them.

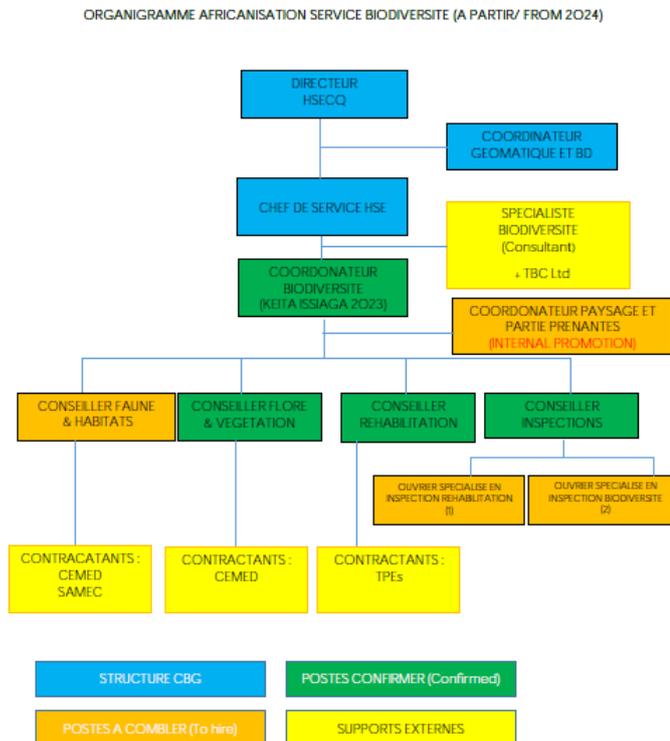


Figure 11-2: Proposed Biodiversity Team Structure for 2024

Crucially, the proposed structure indicates how The Biodiversity Consultancy (TBC), the principal external biodiversity specialists for CBG responsible for oversight and delivery of much of the ESAP item 26: Biodiversity Action Plan (BAP) activities, would interact with the team. This future structure would also involve the creation of a new position of Landscape and Stakeholders Specialist who would focus on delivery of the ESAP Item 28: Landscape Level Plan, i.e. the ILMP. More information on those two topics is provided in subsequent sections of this report.

A general observation on staffing based on the expanding area of operations within South Cogon and in future, North Cogon is that, as a minimum, the current team of an inspection lead with two junior inspection specialists should be maintained. Indeed, the team size may in future need to be increased.

It was reported during the visit that the Biodiversity team will be starting to use in field GIS from ESRI which is an excellent advance in technology available for easier and more accurate capture of data.

The status of vehicles available to the team remains a concern with a view to future work in areas of the South and North concessions where the existing road/tracks are not as good as in much of the area in which CBG is currently active. At present, the fleet of vehicles available to the team seems to be limited and of poorer quality; reliable transport in more remote areas is very important.

11.4 Biodiversity Inspections

In previous visits the IESC has spent office time with the inspection specialists in order to go through key findings. Site time has also included visits to locations being inspected, such as the SMB-W railway (see December 2022 Monitoring report). This time, due to the time constraints on the visit and as the IESC has generally been happy with progress and approach to inspections in previous visits, this was not a focus of this visit.

11.5 Rehabilitation

Rehabilitation continues under the supervision of the rehabilitation specialist who is working with the local nurseries established by CBG to provide sufficient native trees of local provenance for annual rehabilitation targets set out in a Five-Year Rehabilitation Plan. Some of these nurseries were established as part of community efforts and some by the biodiversity team. All now sit within the remit of the biodiversity team and are operating well.

11.5.1 Rehabilitation of Mined Areas

The target in the Five-Year Rehabilitation Plan for 2023 is 259 hectares of rehabilitated land. At the time of writing, CBG has rehabilitated c.200 ha of land, a difference of 59 ha (-23%). However, planting is ongoing in July and August and the target, whilst challenging, is still achievable.

The final total achieved will be reported following the November 2023 site visit. If the annual total falls short of the target, the shortfall is considered unlikely to be too large to be rectified in 2024 and 2025 to ensure that the overall target for five years of 1,287 hectares can be met.

It is also worth noting that in the IESC's opinion, the standard of rehabilitation has typically increased year on year as the team has become more experienced. The quality of rehabilitation is equally important, particularly given the pressures on the rehabilitated land. The quicker the trees establish and grow tall, the more likely they are to survive when slash and burn agriculture occurs. The area of rehabilitation at N'Dangara visited last December and again on this site visit showed strong tree growth. CBG should provide information on the success of rehabilitation to date ahead of the next site visit.

It was also reported that discussions with the chimpanzee expert of TBC, whilst they were on site, had led to a proposed future improvement to rehabilitation in the form of planting of more fruit tree species within the mix of species. This is intended to provide multiple benefits. The main one from a biodiversity perspective would be to give chimpanzees a reason to enter and use rehabilitated areas and therefore improve connectivity for this key species across a rehabilitated concession rather than leaving large areas of rehabilitated land of limited value to them. It would provide similar benefits for other species such as smaller primates.

However, a crucial second element to use of fruit tree species would be to provide a food resource for local communities that is not currently provided in the current tree species mix used for rehabilitation. This may lead to the rehabilitated areas being protected from burning in future or at least reduce the pressure to manageable levels whereby some trees are able to reach a height and age that they survive fires.

A second suggestion by the chimpanzee specialist was related to profiling of mined areas provided for rehabilitation. At present the edges of these areas can be quite steep, almost small cliffs in some locations. This prevents access by fauna and humans alike. Creation of more graduated edges for rehabilitation areas would improve this situation. The IESC supports this idea and it is consistent with the good advice TBC is providing CBG in general.

11.5.2 Additional Rehabilitation

As well as the rehabilitation of previously mined land as set out in the Five-Year Rehabilitation Plan, The CBG Biodiversity team has been improving and/or rehabilitating other areas within the concession, particularly areas of gallery forest degraded by non-mining, third party activities and mine buffer areas. Some of this rehabilitation relates to incursion into buffer zones, some additional rehabilitation to enhance the existing conditions. This is as yet unquantified by existing monitoring but at the request of the IESC, will be by the time of the November visit when the IESC will visit examples of these additional rehabilitation areas.

11.5.3 1000 ha Rehabilitation Celebration

As raised in the December 2022 report, the biodiversity team had reached a significant milestone with a total of over 1,000 ha of land rehabilitated in the six years since 2017. The two most recent years - 2021 and 2022 were the first two years of the five-year rehabilitation plan which were both on target. As such, it was pleasing to see this milestone being acknowledged and celebrated widely within the overall CBG team, including with a large ceremony held on site and attended by staff from various departments in CBG, staff from the nurseries and representatives of the local community.

11.5.4 Rehabilitation around (New) Hamdallaye

It was raised by lenders that further rehabilitation may be required in the Hamdallaye area. Hamdallaye is not included in the Five-Year Rehabilitation Plan as the biodiversity team reports that rehabilitation occurred prior to the development of the five-year plan in that area. Further rehabilitation, if necessary, could be included in the 2024 rehabilitation campaign. In order for that to happen, the areas in question would need to be identified to the Biodiversity team. The proposed Landscape and Stakeholders Specialist shown in the new biodiversity team organogram would be responsible for this liaison. Once in post, they could seek to agree a specific point of contact within the social team.

11.6 Biodiversity Action Plan (ESAP Item 26)

11.6.1 Biodiversity Monitoring and Evaluation Plan (BMEP)

Prior to the site visit, TBC provided a final version of the BMEP which addressed IESC and lenders' comments. An update on progress of the actions was also provided, including details of the many monitoring actions now underway.

11.6.2 TBC Site Visits

The IESC visit coincided with the site visit by TBC experts to meet with the CBG biodiversity team and external specialists to set up various BMEP monitoring surveys, including aquatic monitoring surveys within the gallery forests. As such, the IESC biodiversity specialist was able to observe the work being put into practice that they had previously reviewed and agreed the methods for as part of review of the BAP and associated documentations.

The TBC specialists were seen to work well with the CBG team and specialists, communicating and demonstrating clearly exactly what was required. There have been well documented delays to the process of establishing the monitoring and with understandable reasons for those delays, so it was pleasing to see it finally progressing on the ground and to a high standard. A similar visit by the TBC chimpanzee expert to ensure monitoring for that key species will be undertaken correctly,

occurred prior to the IESC site visit and was reported to have been similarly successful. The IESC acknowledges the positive progress on chimpanzee monitoring.

11.6.3 Quality Assurance

One concern prior to the TBC site visit was quality assurance of the data being collected by local staff, particularly with regard to the hard to identify fish species. It was therefore reassuring to see the TBC specialist install the future QA process. Standardised photography of fishes caught and collection of eDNA samples will ensure that species identification is correct and could perhaps lead to preparation of a Fish ID guide for the area in the future.

11.7 Integrated Landscape Management Plan (ESAP Item 28)

11.7.1 Meeting

The IESC biodiversity specialist, CBG Biodiversity team and specialist from IDR (the consultants developing the ILMP) held a meeting on 6th June 2023 in order to discuss the key comments from the IESC and lenders on the versions of the plan to date.

The key topics discussed were:

- Governance of the plan implementation assuming that the key staff undertaking actions will remain in the field;
- Roles/responsibilities and limitations of the stakeholders (CBG, authorities, communities, other mining companies) in the mobilisation of resources and in the implementation of the plan
- Need for budgeting and resource allocation;
- Participation of the internal stakeholders, particularly the Community Relations team; and
- The need for implementation of the plan to start as soon as possible

IDR also presented some useful and relevant case studies for similar projects elsewhere, demonstrating a clear understanding of what is required. Following the meeting, the ILMP was finalised and provided to the IESC for review (see following section).

11.7.2 Final ILMP

The final version of the plan was provided by CBG following review by the IESC biodiversity specialist and lenders. Key outcomes are as follows:

- it is a detailed plan based on comprehensive data and community consultation;
- the key comments from the IESC and Lenders have been addressed; and
- the Action Plan setting out the detail of the delivery of the ILMP needs to be updated to ensure that the proposed timeline is correct given the delay in agreement of the final version due to the need to address IESC and Lenders' comments.

11.7.3 Implementation (Staffing)

Following agreement and finalisation of the ILMP, CBG's focus must turn to implementation. That is not to say that efforts to start the process have not already begun, but that the formalised process can now progress. In order for this to happen, a dedicated role within the biodiversity team is needed, exactly as set out in the biodiversity team organogram for 2024 provided to the IESC biodiversity specialist during the site visit. This could be an internal hire/promotion as, in the IESC's opinion, there are staff already at CBG with the skills to fulfil the role, or an external hire. Regardless of where they come from, the individual must have full control of the ILMP

implementation, lead on liaison with the social teams, all with the full support of CBG senior management. In order to ensure progress with this key deliverable, and track its progress, the IESC recommends to add it to the Road Map in its own right.

11.8 Site Visit

Figure 11 shows the location of points visited during the site visit (indicated by red dots). The information gathered at each location informed the preceding sections with Figure 11-4 providing photographs of the locations and location specific information.

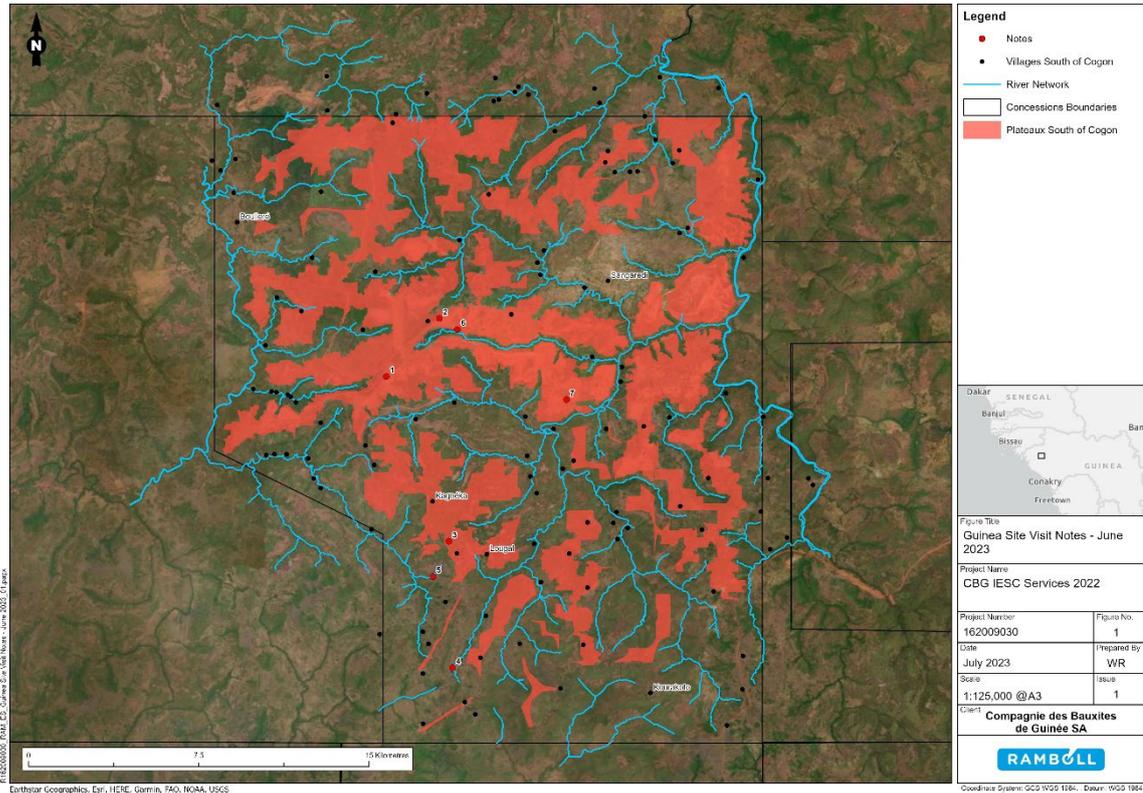


Figure 11-11-3: Locations Visited within the South Cogan Concession between 6th-8th June

Location	Photograph	Details
1		N'Dangara rehabilitation, visited in December 2022 and revisiting on this site visit. Excellent growth of the small, young trees, both within and outside of topsoil areas. However, highlighting the difficulties in rehabilitation for the biodiversity team, the areas immediately to the east, south and west are operational mine and this rehabilitated area is somewhat isolated. The ideal scenario would be for rehabilitated areas to form corridors across the concession.

Location	Photograph	Details
2		<p>Immediately east of the rehabilitation area shown in Picture 1, lies an area which has been reprofiled following mining but not yet rehabilitated. It clearly demonstrates one of the challenges of rehabilitating the landscape alongside ongoing mining. In some areas, the ground level is approximately 10-15 m below the un-mined ground level. These edges create barriers to movement for both fauna and flora. The IESC strongly supports the suggestion made by TBC (and previously by the IESC on H&S grounds) to leave gradual slopes rather than cliffs.</p>
3		<p>This location on the edge of the Kagnaka plateau seen prior to any CBG activity, clearly shows the impact of habitat clearance for cashew plantation. With the forthcoming mining of the Kagnaka plateau, the cumulative effect is of greatly reduced areas of remaining natural habitat.</p>
4		<p>TBC specialists training the CBG Biodiversity Team and local specialists CEMED in the correct methods for fish sampling and assessment of gallery forest habitat quality.</p>

Location	Photograph	Details
5		<p>Fresh chimpanzee signs – tree nest in the Forest of Lougal on the edge of the Kagnaka Plateau. During the December 2022 site visit it was reported that local communities intended to start to clear areas of the forest for various uses, partly due to the need for alternative land to that to be mined. Although the highest quality parts of the forest remain undisturbed for now, clearance has commenced at the edges. The forest is one of the key locations for chimpanzees in the southern part of the South Cogon concession. Efforts must be made through the ILMP process to protect it.</p>
6		<p>Traditional palm oil and other palm production extraction in N'Dangara forest adjacent to the CBG offices. It is considered to provide an ideal location to trial many of the principles and approaches set out within the ILMP and demonstrate to all stakeholders how it might work across the wider concession. The Hamdallaye Market Gardening initiative is located on the edge of the forest, making it an ideal location.</p>
7		<p>The 1,000 ha rehabilitation celebration and tree planting ceremony.</p>

Figure 11-4: Locations Visited during Site Visit

Table 11-1: Summary of PS6 Findings

ID	Aspect	Issue Description	Phase	IESC Recommendation	Significance
June 2023 - 044	Biodiversity - rehabilitation	CBG reached the notable milestone of over 1,000 ha rehabilitated. The efforts so far under the Five-Year Rehabilitation Plan have been good and remain on target. The plan is intended to reduce the total area of un-rehabilitated, open land within the concession. The success of the rehabilitation areas, in terms of tree survival and growth rates is monitored as part of the Five-Year plan. Now, after reaching the 1,000 ha milestone and at the end of the third year of planting under that plan, is an ideal time to develop a clear overview of the status.	Operation	Provide any monitoring data on the status of rehabilitated areas. This can include areas rehabilitated prior to the current five-year plan, areas completed as part of the plan, and areas of additional rehabilitation within buffer areas. The most useful way to deliver this may be visually in the form of maps, potentially colour coding by success criteria, areas damaged or destroyed following community activity etc. but it is entirely for CBG to confirm approach and success criteria. This should be provided ahead of the next site visit in order for the IESC to focus the site visit on key areas.	Moderate
June 2023 - 045	Biodiversity - resourcing	ILMP Staff lead	Operation	As set out in the staff organogram provided to the IESC, CBG should appoint a dedicated specialist to oversee the ILMP process. At present it is being overseen by a variety of biodiversity team staff, not least the biodiversity team manager. However, the Biodiversity Manager leaves at the end of 2023 and so the ILMP specialist should be in post before then.	Moderate

12. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

During the June 2023 site visit, no dedicated session was held on Cultural Heritage due to a change of the agenda and prioritization of activities associated to IFC PS2. However, CBG has provided documentation on that topic following the site visit. All the actions from the Cultural Heritage Management Action Plan are reportedly completed (see figure below).

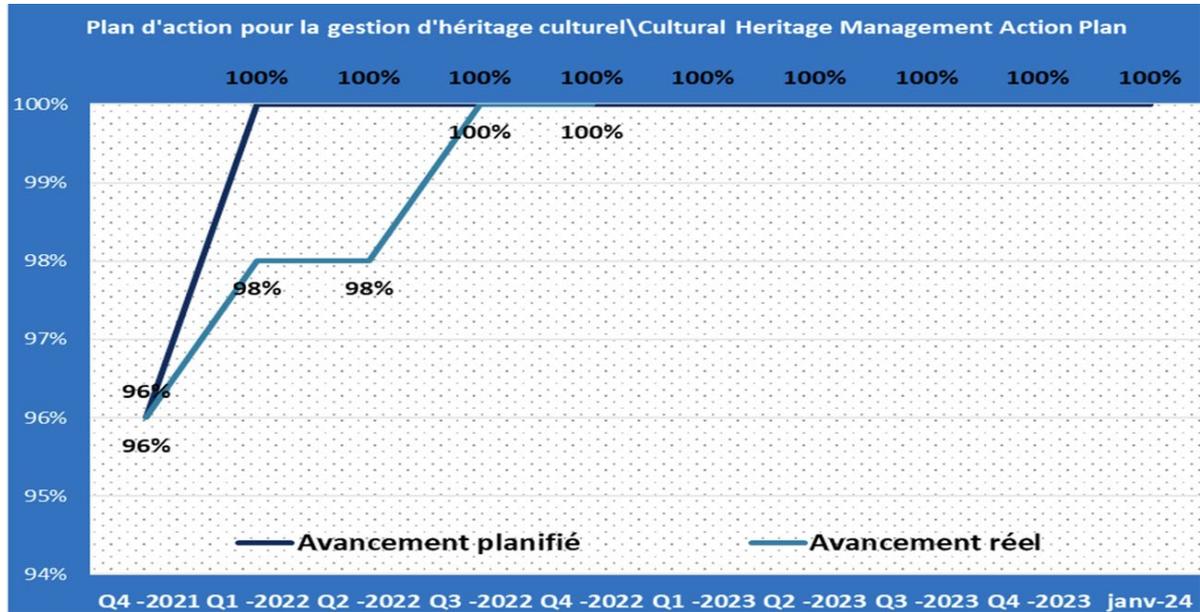


Figure 12-1 Status of the Cultural Heritage Management Action Plan

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

8 cultural induction sessions were provided to CBG personnel and subconsultants from January to April 2023. In total, 162 people took part in the cultural heritage induction, including 16 women.

The IESC’s December 2022 report mentions an annual monitoring report for the CHMP, Action Plan and KPIs was planned to be prepared in Q1-2023. In June 2023, the Cultural Heritage monitoring report was under development.

The community of Paragogo has lodged a grievance about the need for a sacrifice on the Thiapikouré plateau at the start of the mining activities. CBG bought a black bull and handed it over to the community for sacrifice.

As of April 2023, 15 consultations and awareness-raising meetings on cultural heritage were held:

- 13 at villages
- 1 meeting held at COBAD to remind on the presence of cultural heritage sites on the mining road.
- 1 follow up meeting on the sacrifice (grievance mentioned above)

No findings on cultural heritage were made during the June 2023 site visit.

APPENDIX 1 SITE VISIT ITINERARY

CBG Site Visit, week commencing 5th June 2023

Day 1. Monday 5th June

Time slot	Environment	H&S	Social (excluding resettlement)	Resettlement	Biodiversity
0700 - 1100	Travel from Conakry to Kamsar (Internal flight)				
1100 - 1300	Houses installations and PPE, Induction (CDF)				
1430 - 1730	In Kamsar office: <ul style="list-style-type: none"> - HSECQ Director opening - Mine E&S Road Map (compliance status update) - Presentation ASI/SMI - Project status update including: Latest on mine plan and recent LDPs (South of Cogan) - MUOA progress update - Planned plant upgrades Participants CBG: Group Directors, HSECQ Team, Reporting Meeting Room: Kamsar Amphitheatre CDF				

Day 2. Tuesday 6th June

Time slot	Environmental	H&S	Social	Resettlement	Biodiversity
0800 - 1030	<p>Kamsar (field)</p> <p>Meeting point at Torabora</p> <ul style="list-style-type: none"> - Inspection of hazardous waste facility/area (upgrade works performed) - PIT: Unloading area (tippler) and primary crusher (Tour standard) - Port (Quai) - Power station 		<p>Kamsar (Office)</p> <p>Human Resources, Equipment, Training</p> <ul style="list-style-type: none"> - Community Relations Team - Staffing resources - Other resources - Training 	<p>Kamsar (Office)</p> <ul style="list-style-type: none"> - Appointment of new resettlement staff (status update) - RPF – status - Grievances (resettlement related) 	<p>Kamsar (office)</p> <p>Office sessions (prioritised list):</p> <ul style="list-style-type: none"> - General update: overall progress, staffing, resourcing - Biodiversity inspections: Examples of inspections completed, review of inspection register, non conformities, SMB + COBAD - Reinstatement progress/progress against targets. Outstanding report findings
1030 – 1230	<p>Kamsar (field)</p> <p>Meeting point and Engineering office</p> <p>Effluents:</p> <ul style="list-style-type: none"> - Effluents locations 	<p>Kamsar (field)</p> <ul style="list-style-type: none"> - Area with work in progress (contractors) - Walkover inspections. Will include inspection of safety measures, 	<p>Community Development Plan:</p> <ul style="list-style-type: none"> - Progress with implementation (investments made / activities undertaken / the communities targeted / initial observations) - Current efforts to collaborate / coordinate with other CBG teams (e.g. resettlement, 	<p>Kamsar (office)</p> <p>Status updated for each of the existing / draft RAPs/LRPs</p> <ul style="list-style-type: none"> - Hamdallaye and FF RAP 	<p>Kamsar (office)</p> <p>Discussion of Integrated Landscape Management Plan, ideally including representatives from</p>

	<p>(surface water discharge) and tour of effluent treatment (oil separator and others) and discussion on corrective works</p> <ul style="list-style-type: none"> - Hazardous material storage area (some) - Oil spill response location <p>AQ Monitoring: AQ Monitoring station (Kamsar) and AQ emissions points</p>	<p>discussions with contractors</p> <ul style="list-style-type: none"> - Also equipment and plant maintenance processes, Risk Management and Control of Work 	<p>biodiversity) as well as other actors in the region and implementation partners</p> <ul style="list-style-type: none"> - Update on monitoring and evaluation, including study that was proposed in 2022 to gather key data / establish a baseline for monitoring the outcomes of CBG’s community development efforts <p>Stakeholders Engagement: Update on the engagement activities</p> <ul style="list-style-type: none"> - Stakeholders engaged, frequency, topics and methods of engagement, feedback and how this has been addressed - Update on efforts to promote the participation of women and vulnerable groups - Management of interactions and relations between external stakeholders and CBG contractors - Monitoring of engagement activities through KPIs - Reporting of engagement activities (internally/externally) - Key issues / challenges faced - Fishermen update 	<ul style="list-style-type: none"> - Kankalaré / Thiapikouré / Contingency block LRP - MUOA LRP - Kagneka and Parawi extension LRP - Mbouroré LRP/RAP 	<p>social teams, activities relating to NoCo</p>
1230-1330	Lunch				
1400 - 1500	<p>Kamsar (office)</p> <p>EMOP: Discussions on the following topics:</p> <ul style="list-style-type: none"> - CBG’s environmental 	<p>Kamsar (office)</p> <ul style="list-style-type: none"> - H&S organisation and resourcing (new recruits) - 2022 H&S performance (key monitoring programs, key metrics) 	<p>Community Health and Safety:</p> <ul style="list-style-type: none"> - Implementation of CHSMP and reporting on KPIs - Blasting activities, including implementation of the Blasting Agreement - Communicable disease prevention efforts (mosquito nets, collaborations, national 	<p>On the road from Kamsar to Sangarédi</p> <p>Travel to Sangarédi stopping at locations to observe IGA actions associated with implementation of LRPs</p>	<p>Travel to Sangarédi</p> <p>As above, Dangara and other rehab areas if time</p>

	<p>monitoring team update</p> <ul style="list-style-type: none"> - Review of current EMPs and updates - Environmental Monitoring Programme (EMoP) and matrix, CBG’s 2022 Annual Monitoring Report <p>Disclosure of environmental monitoring results to communities</p>	<ul style="list-style-type: none"> - Presentation on H&S management (identified key / material issues) - Session dedicated to discuss recent rail incident and current safety controls for work on the railway 	<p>malaria programme, survey and baseline data gathering)</p> <ul style="list-style-type: none"> - HIV and AIDS (plans for 2023) - Rail-related community health and safety (implementation of RRSMP) - Incidents / near misses - The hommes piqueut (including training, distribution and equipping of flagmen) - Ongoing community awareness raising and provisions for potentially vulnerable groups - Next steps / key priorities - Livestock incidents along the railway 		
1500 - 1630	<p>Kamsar (Office)</p> <p>Water/OWS</p> <ul style="list-style-type: none"> - Water Management Plan implementation, drainage design, Oil Water Separator corrective action plan, mine effluents turbidity, communities wells Hamdallaye, UV treatment system at the WWTP (& sludge), Kamsar 	<p>Kamsar (office)</p> <p>Deep dive H&S discussion with H&S team (CBG)</p> <p>Review of H&S MS elements</p> <ul style="list-style-type: none"> - Adequacy of OHS documentation (policies, manuals, SOPs, plans) - Incident investigation and root cause analysis - Resourcing levels - Commitment for Senior Management/ decision makers - Training and competency 	<p>Kamsar (office)</p> <p>Grievances Management and Doleances:</p> <ul style="list-style-type: none"> - Update on the status of grievances since the previous site visit - Effectiveness of the grievance mechanism (use of GM and resolution timeframes) - Efforts to raise awareness about and encourage the use of the grievance mechanism - Grievance management and reporting - Update on the status of doleances 		

	<p>WWTP (bypass and rain issue)</p> <p>Noise and Vibration</p> <ul style="list-style-type: none"> - Noise and Vibration Action Plan, mapping and monitoring of sensitive receptors (along the railway), independent noise specialist, surface miners - Impacts (water, air/dust etc.) on communities 	<p>management for CBG employees and contractors</p> <ul style="list-style-type: none"> - Improvement of safety culture - Management of operational safety risks for both controlled and monitored activities (efficiency of the existing H&S system) - H&S assurance processes and management reviews 			
<p>1630 - 1730</p>	<p>Kamsar (office)</p> <p>Waste:</p> <ul style="list-style-type: none"> - Ongoing works at the main waste facilities and redevelopment of hazardous waste facilities in Sangarédi and Kamsar - Waste Management (scope of the new consultancy), initiatives / progress against action plans 	<p>HSE performance data (including discussion around fatalities)</p> <ul style="list-style-type: none"> - Corrective action tracker - Challenges faced by CBG - Implementation of Alcoa corrective action plan - Improvements / initiatives re safety culture 			

Day 3. Wednesday 7th June

Time slot	Env	H&S	Social (incl)	Resettlement	Biodiversity
Morning (leave 0730)	(With social team) Travel to Sangarédi to join resettlement team at Fassaly Foutabhe in the morning	Travel to Sangarédi Inspection of Sangarédi offices and workshop areas Travel to mine area to visit active mine site and haul roads to inspect working conditions and safety measures, discussions with contractors. Also equipment and plant maintenance processes, Risk Management and Control of Work Explosive storage area & meeting with the blasting contractor	Travel to Sangarédi to join resettlement team at Fassaly Foutabhe in the morning	Visit to Hamdallaye resettlement site – community meeting in Hamdallaye and visit to GIEs. Visit to Fassaly Fouthabé – community meeting, including meetings with GIEs	Visits to North part of the South of Cogon Concession: Rehab areas – including where communities have started to reuse them in a detrimental way, Active BMEP monitoring sites, nurseries, Cogon River area
Afternoon (around 14h/15h)	Visit of the following: - Drive past the stockpiles/train loading areas - WWTP visit and other relevant water infrastructure - Sangarédi waste landfill - Drinking water treatment plant	Inspect contractors’ facilities, including facilities provided to security contractors. Overnight in Sangarédi			

Day 4. Thursday 8th June

Time slot	Env	H&S TEAMS Room 2	Social	Resettlement	Biodiversity
0730 – 1030	Return to Kamsar first light Stopping at locations along RoW (tbc): fencing and overpasses. Area on recent fatality & inspect contractors’ facilities, including facilities provided to security contractors & for appreciation purposes and observation of community safety measures.			LRP elaboration process and/or implementation of LRP actions	Visit to southern part of South Cogon concession to visit key locations for Integrated Landscape Management Plan Area: Lougal Forest / Kagnaka plateau, SMB railway sites, other BMEP monitoring locations
1100 - 1300	MOC: Meeting with the MoC coordinator, discussion on the MoC organisation (committee), the MoC procedure, the MoC register and MoC forms. (Status/implementation of management plans), including Management of Change (MoC), (progress since previous visit)	Contractors Management: H&S discussion with contractors’ representatives - Contractor management including H&S contractual obligations placed on contractors - H&S communication and workforce engagement including with contractors. - Contractors’ labor and working conditions - Labor and working conditions - Grievance mechanism	Meetings with PAPs and implementation partners in Parawi, Mbouroré Return to Kamsar		
1300 - 1400	Lunch				
1400 - 1600	ESAP Discussion if time left IESC Prep time for Close out meeting				
1600 - 1730	Close out meeting				

Day 5. Friday 9th June

Time slot	Env	H&S	Social	Resettlement	Biodiversity
0800 - 1000	Travel by Road to Conakry and depart				

**APPENDIX 2
STATUS OF ESAP ITEMS (AS OF JUNE 2023)**

CBG BAUXITE MINE

	Theme	Required Action	Date	Indicator of Completion	Status
1	Operation HSEC-MS	Develop a route map outlining major milestones (based upon actions, timeframes, and interim deliverables), to bring operations up to a level consistent with IFC Performance Standards.	10 Business days after receipt of comments from IESC/Policy Lenders.	Gap Analysis	Closed
		This route map will be informed by a 'stand-alone' gap analysis with respect to current systems and any additional items required for IFC compliance, and, also, recommendations arising from work done to implement the other ESAP actions	31/01/2022 (draft) 31/03/2022 (final)	Route Map	Closed
		Align HSEC MS for existing operations with HSEC MS for the Expansion Project and bring current operations up to a level consistent with the intent of the IFC Performance Standards	31/01/2024	Evidence of HSEC MS aligning with HS	Open Pending (due January 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.	Closed

		Revise and update the Stakeholder Engagement Plan to reflect current/future needs and lessons learnt since 2016. The revised and updated Stakeholder Engagement Plan should focus on the period 2022 to 2025 and on improving alignment to IFC standards (for example, the stakeholder analysis/mapping section). The SEP to include a communication program to report back to communities about the results of water and air monitoring.	One month after receiving comments on the draft	SEP (2022 to 2025)	Open (undergoing CBG revision)
		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.	Open 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.	Closed
8	HSECQ Resources	Prepare and implement a Time-bound Capacity Development and Resource Acquisition Plan for 2020 to 2021 (Version 1) for the Community Relations and Resettlement sections, including resourcing for social risk management teams, purchase of equipment/resources (such as vehicles, GPS handsets, and data management software) and in situ/external training of staff members in use of acquired resources.	20/11/2020	Capacity Development and Resource Acquisition Plan for 2020-21 (Version 1).	Closed

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

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 (under Lender review)
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.	Open

		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)
12j	E&S Management Plans	Finalised Emergency Response Plan.	20/05/2021	Final Emergency Response Plan Signed off by IESC.	Closed
13	E&S Management Plans	i) Prepare an interim Air Quality Management Plan (AQMP) in accordance with the Scope of Work (Ref. AIR QUALITY Scope of Work ver 3). The Interim AQMP will be informed by the 2019 emissions data for Dryers 1-3 (and other sources) and dispersion modelling. The Interim AQMP will also propose stack emission limits and measures necessary to meet proposed limits and will include information on the necessary financial budgets to achieve the requirements within. Proposed emission limits will be agreed with Policy Lenders and the IESC.	(Subject of a waiver – in progress)	Interim AQMP	See below
		Update the interim AQMP to include consideration of Dryer 4 emissions and additional sampling data collected for Dryers 1-3/other sources as applicable and in accordance with the Scope of Work to produce a Final AQMP.	(Subject of a waiver – in progress)	A Final AQMP.	Open (pending completion of actions in AQMP Corrective Action Plan)

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 (pending permanent solution – in the interim the temporary solution is working well)
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 (pending sign off by IESC/ Policy Lenders)
		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	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

		corrective action plan with budget to cover implementation. CBG to complete implementation of the Corrective Action Plan.			
22	Hamdallaye and Fassaly Foutabhé RAP	Prepare and implement a COVID-19 Plan for H2, 2020, with the key aim of ensuring that CECI resumes/increases activities, in agreement with the communities, as soon as possible while respecting governmental restrictions.	16/11/2020	COVID-19 Plan	Closed
23	Hamdallaye: Resettlement Housing and Infrastructure Repairs Action Plan	Prepare and implement a time-bound Action Plan for housing and infrastructure repairs and other additional works related to the Hamdallaye resettlement site.	30/11/2020	Action Plan	Closed
		Environmental Monitoring Programme to be amended to include sampling and analysis of Hamdallaye water supply. Analysis of data, and any corrective actions needed.	See Item 12c	Updated Environmental Monitoring Programme to include water sampling and analysis	Closed
		PAP satisfaction survey to be undertaken upon completion of repairs and works specified in the Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.	As per the time bound by the Corrective Action Plan	PAP Satisfaction Survey Results	Closed
24	Hamdallaye: Land Rehabilitation Action Plan	<p>Prepare (i) and implement a time-bound Action Plan, with biodiversity inputs, to implement the soil rehabilitation programme as per CBG's report (RAP Hamdallaye & Fassaly Foutabhé: Project Status Report, 12 February 2020) including setting up a pilot field to build the capacity of the population on soil fertility management and finalizing the individual allocation of land (ii to iv) to the respective affected people as per the RAP. The Action Plan, also, to include specific rehabilitation measures for:</p> <ul style="list-style-type: none"> - the replacement crop-growing land (56 ha); - all land to be used for land-based livelihood restoration activities; and - land for household gardens and fruit/shade trees. <p>v) PAP satisfaction survey to be undertaken upon completion of measures specified in the Action Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.</p>	30/11/2020	A completed time-bound Action Plan.	Closed
			29/01/2021	Initial evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed
			31/12/2021	Interim evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed
			30/09/2023	Final evidence of allocation of all restored land (56 ha) to all entitled PAP's.	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
25b	Economic displacement (i) Thiapkhore LRP ii) Contingency Blocks LRP iii) IA for contingency blocks iv) closed	i) Prepare and submit an LRP with respect to PAPs already impacted by displacement in Thiapikouré. This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	15/06/2021	Draft and Final LRP.	Open
		ii) Prepare and submit an LRP for review and approval by the Lenders with respect to PAPs affected by land disturbance through the streamlined process (Bouroré 1a, 1b & Parawi 2a). This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	Draft 31/08/21 and then 1 month after receiving lender comments.	Draft and Final LRP.	Closed
		iii) As an interim measure, prepare and submit an impact assessment of the economic displacement, for Bouroré 1a, 1b & Parawi 2a, and identification of those PAPs that are most vulnerable and for which transitional support will be provided.	Draft 30/7/21 and then 1 month after receiving lender comments.	Draft and Final Impact Assessment.	Closed
		iv) Formal written commitment by CBG not to disturb land before any LRP is in place.	30/11/2020	Written Commitment	Closed

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

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

APPENDIX 2

STATUS OF ISSUES IDENTIFIED IN PRECEDING MONITORING VISITS

Status of issues raised in the previous site visit reports (December 2022 report and prior reports)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Dec 2022 _001	Organizational capacity and competence - staff resources	The permanent Resettlement Manager post remains to be filled. The Environmental Monitoring Team Leader is due to leave CBG at the end of Q1, 2023. It is unclear whether he will be replaced by an external hire/there is a succession plan in place.		CBG to continue in its efforts to recruit the Resettlement Manager and clarify its position with respect to the Environmental Monitoring Team Leader position. <i>Post site visit note: The IESC has been informed that CBG intends to appoint a new EMTL.</i>	High	Open
Dec 2022 _002	Organizational capacity and competence - staff resources	The CR Team remains unchanged since the previous IESC site visit despite recruitment of new staff for the CR team is underway.		New personnel to be appointed as a matter of priority	Moderate	Open (new personnel appointed in early 2023, yet delays are observed compared to CBG's resourcing planning)
Dec 2022 _003	Organizational capacity and competence - staff resources	To minimise disruption to workloads whilst fulfilling training commitments, the CR Team plans the hiring of interim staff to provide coverage for absent members of the CR Team where they are undertaking training		CBG to careful timely planning of the temporary resources needed to support training is also required in view of the foreseen training schedule. Timeframe for such appointments to also include shadowing periods to ensure appropriate knowledge transfer.	Low	Closed (CBG has provided justification and criteria for the hiring of temporary staff)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Dec 2022 _004	Organizational capacity and competence - equipment resourcing	IsoMetrix full implementation has further delays recorded compared to the last IESC site visit		Regular use of IsoMetrix to start as a matter of priority.	Moderate	Open (despite progress on IsoMetrix and preliminary data onto the system, IsoMetrix has not yet fully implemented)
Dec 2022 _005	Organizational capacity and competence - equipment resourcing	CBG has experience long delays CBG in purchasing and receiving the required equipment.		CBG to regularly plan new equipment in combination with the use of the Sponsor / Champion approach in case of delays. Planning should include conservative timelines that consider past procurement delays. Also Ref. Oct 2021_008	Low	Open (No evidence of purchase needs has been recorded in the first half of 2023. Additional verification to check CBG's improvements on planning and "responsive" purchase is necessary. The item is however downgraded to Low.
Dec 2022 _006	Organizational capacity and competence - training	The 2023 Training Plan does not contain provisions for a dedicated training session on Gender Based Violence and Sexual Harassment (GBVSH)		Training on Gender Based violence and Sexual Harassment to be included and provided as part of CR team's 2023 training plan	Low	Open (CBG informed that the training on GBV has been included though yet not

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
						provided). This item remains open but downgraded).
Dec 2022 _007	Organizational capacity and competence - training	Current version of the 2023 Training Plan targets the social team only (i.e. CR and resettlement); no training on social matters is planned at present for colleagues from other departments.		Development of a programme for periodic, internally-led training and awareness-raising events targeting other departments is still required to align current practices with the requirements of the IFC Performance Standards (an ESAP requirement).	Low	Open (training material under development, implementation and programme yet to occur)
Dec 2022 _008	Stakeholder Engagement	The 2022-2025 SEP is yet to be finalized and disclosed because it is subject to ongoing review by Lenders.		CBG (and Lenders) to ensure that the SEP is finalized and disclosed as a matter of urgency. In the interim, the previous version of the SEP should remain publicly available on CBG's website.	Moderate	Open (SEP under Lenders' review; previous SEP confirmed online. Item downgraded)
Dec 2022 _009	Stakeholder Engagement	Engagements at the port are currently on hold due to recent unavailability of pilots specialised in driving boats suitable to reach the areas of intervention.		CBG to re-establish engagement activities at the port area as a matter of priority.	Moderate	Open (Provisions have been put in place to progress with the engagement at the port néné but meetings at the islands yet to be organized)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Dec 2022 _010	Stakeholder Engagement	At the moment no specific engagement with women to analyse issues related to GBV-SH have been undertaken.		In the time that training on GBV-SH is organized for relevant CR personnel, engagement with women on GBV- SH should occur via collaboration with a local, specialised NGO – in line with CBG’s intention.	Low	Open (Contract with ADJEF in place, event to sensitize CBG’s female workforce organized; gender-sensitive consultation with communities to be organized)
Dec 2022 _011	Stakeholder Engagement	As of today, CBG has undertaken no specific engagement with People with Disabilities (PWDs)		A more dedicated engagement with PWDs is required, also through involvement of NGOs working in the field.	High	Closed
Dec 2022 _012	Stakeholder Engagement	Consultation follow-ups occur though not systematically. Minutes of meetings for every consultation are not shared with communities and signed off as evidence of recognition and acceptance of the topics discussed		Ensure that minutes of the consultations undertaken to be shared with communities and signed off.	Moderate	Open (Sample of minutes of meetings shared with no signature or content indicating acceptance of minute of previous meetings)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Dec 2022 _013	Stakeholder Engagement	While disclosure of environmental monitoring methodology occurs, CBG has not started disclosing environmental monitoring results to communities.		Disclosure of Environmental monitoring results to be organized as a priority.	High	Open
Dec 2022 _014	Community Grievance Mechanism	The GMM procedure should include additional (sub-) categories to better cover community health and safety (e.g. security arrangements); environment (e.g. soils / ground contamination, waste disposal), socio-economic (e.g. business / procurement opportunities) and resettlement/land occupation (e.g. use of land in unauthorised areas). CBG should also consider adding additional (sub-)categories to classify and monitor grievances related to biodiversity.		GMM Procedure revised and finalised based on the second review of the document by the IESC and Policy Lenders.	Moderate	Closed
Dec 2022 _015	Community Grievance Mechanism	2020 and 2021 grievances are still open.		CBG to strengthen the capacity of the monthly HSECQ committee meeting to act swiftly to ensure that there are no institutional 'obstacles' to swift action in terms of: i) recognizing the legitimacy of the grievances; and then ii) putting in place the actions to close them as soon as possible	High	Open (HSECQ committee meeting rescheduled for April 2023 but no updates have been received as follow-up)
Dec 2022 _016	Community Grievance Mechanism	Current version of the grievance register does not keep track of how much time it takes to close grievance so to monitor deviation from the timeframe proposed in		CBG to start using updated KPI as part of the grievance register to collect data on the timeframe "for closing grievances by type (source, level, nature)".	Moderate	Open (- The grievance register now contains a column to collect

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
		<p>the grievance mechanism procedure (50 days). The grievance register should also keep track of all grievances which are now managed through the CAO mediation.</p>		<p>The Grievance register to keep track pf grievances under CAO mediation.</p>		<p>data on resolution delay of grievances; yet actual monitoring has not yet shared for review)</p> <p>Grievances under CAO mediation needs to be better identified.)</p>
Dec 2022 _017	Community Grievance Mechanism	<p>Grievance management related KPIs can be found in the updated (yet to be finalized) SEP and in the GMM procedure</p>		<p>CBG to ensure that all grievance management related KPIs are applied and monitored</p>	Low	<p>Open (CBG is working on revising / finalizing KPIs pertaining to grievance management)</p>
Dec 2022 _018	Community Grievance Mechanism	<p>A recent demonstration of women in Camp Balanta (Kamsar cité) for rotating power outage was not recorded in the grievance register</p>		<p>All grievances to be recorded in the grievance register. Also Ref. Oct 2021_033, Appendix 3</p>	Moderate	<p>Closed</p>
Dec 2022 _019	Community Grievance Mechanism	<p>Possibility for anonymous grievances has not been clearly disclosed to communities and it should be ensured according to the GMM procedure.</p>		<p>Disclosure possibility for anonymous grievances. Also refer to the IFC Good Practice Note "Addressing Grievances from Project Affected Communities".</p>	Moderate	<p>Closed</p>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Dec 2022 _020	Community Grievance Mechanism - Dolèances	The dolèance register should be improved to better keep track of the time it takes to manage communities' requests and to better inform about the dolèance status.		Updated Dolèance register	Low	Open
Dec 2022 _021	Environmental Management Plans	Certain Environmental Management Plans have not been updated since January 2019, in part because updates were being linked to outcomes from the implementation of the Road Map/development of the integrated Management System. This finding has been made before and is repeated to emphasize an increasing urgency to update the EMPs.	PS1	Undertake a structured review of current EMPs and update accordingly, keeping the IESC/Lenders informed in accordance with the MoC procedure	High	Open
Dec 2022 _022	2022 dredging campaign	Dredging of port, turning circles and approach channel was completed outside of sensitive periods for marine fauna in accordance with the Dredge Management Plan and a Dredging Permit. However, the IESC is unable to confirm whether certain requirements of the permit/DMP were executed, including characterisation of sediment quality and benthos prior to dredging	PS1	Future dredging campaigns should comply in full with the relevant requirements of the DMP as transposed into Dredging Permits.	Moderate	Open
Dec 2022 _023	Risks and impacts	Numerous findings from waste management (hazardous area and storage workplace)	All	<ul style="list-style-type: none"> • The hazardous waste area: <ul style="list-style-type: none"> ○ Add first aid kits (eye wash and emergency shower systems) and fire emergency equipment near the area. ○ Clearly identified with labels all products stored in (and near) the area. 	Moderate	Open (the new area is under construction)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				<ul style="list-style-type: none"> • The waste storage workplace: <ul style="list-style-type: none"> ○ Checked if fuel storage tank complies with the manufacturer's recommended location rules. ○ Keep HSE documents in the work areas (e.g. Take5 assessments). <p>Formalise all inspections regardless of whether there are observations/findings.</p>		
Dec 2022 _024	Asset integrity/falling objects	Corrugated sheeting used as cladding for the transfer towers is loose and/or damaged presenting a risk to workers operating below. Also, accumulations of bauxite dust were observed on several angled panels presenting a risk to workers below in the event the dust falls as a consolidated mass	Operations	<ul style="list-style-type: none"> • CBG should inspect its assets to identify risks from falling objects. Damaged or loose panels at risk of falling should be repaired with access to areas below any high-risk areas cordoned off in the interim 	Moderate	Open
Dec 2022 _025	OHS system	Lack of follow-up to the multiple action plan(s) may result in the reoccurrence of similar serious events (fatalities, fatigue and maintenance management)	All	<p>Mine haul roads:</p> <ul style="list-style-type: none"> ○ Include the road sections intended for communities in the traffic management plan (manage road signs and guard to discourage continued use of haul roads). ○ Improve the working conditions of guards and control the application of CBG rules by contractors. <p>Mine control centre (PCC):</p> <ul style="list-style-type: none"> ○ Decide on the effectiveness of the facial recognition devices for deployment to all vehicles or to investigate an alternative device. 	High (Moderate in isolation and High collectively)	Open

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				<ul style="list-style-type: none"> ○ Considering a way to control of drivers' schedules and break times between shifts. <p>Mine workshops:</p> <ul style="list-style-type: none"> ○ Perform more inspections on site and provide on site procedures and instructions relating to damaged equipment. Identify damaged equipment and isolate it immediately (controller module of a lifting device, extinguisher, fire hose cabinet). <p>Railway:</p> <ul style="list-style-type: none"> ○ Keep HSE documents in the work areas (e.g. Take5 assessments). ○ Considering a way to simultaneously alert and inform multiple parties (hommes piquets) along the railway line involved at the same time. <ul style="list-style-type: none"> • Integrated Management System: • Continue and increase the deployment of the system on Sharepoint (simplify action plans). 		
Dec 2022 _026	OHS System	Clarify the HS documentation process to avoid errors or misunderstandings in the workplace	All	<ul style="list-style-type: none"> • Clarify the process for archiving HSE documents. • Clarify the procedure for the management of change (and revision of safety documentation) on site. • Share and provide with contractors and employees the site safety procedures of CBG. • Include lifting operations as operations requiring a work permit in the Job Safety Analysis template. 	Moderate	<p>Open</p> <p>(however the IESC notes good progress has been made)</p>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				<ul style="list-style-type: none"> Add the required documents to the CBG excavation permits. 		
Dec 2022 _027	Contractor Management Plan	New Contractor Management Plan is ongoing with involvement of HR, legal and procurement departments	All	<ul style="list-style-type: none"> Continue and accelerate the implementation of the CMP. 	Moderate (See action "March 2022_012" in appendix 3)	Open
Dec 2022 _028	Organizational capacity and competency	OHS organisation	All	<ul style="list-style-type: none"> Simplify tools and tables to complete for HS reporting to provide clear KPIs. Review KPIs to comply with the action plan and priorities. Review the reporting and monitoring tools so that they serve as communication tools. 	Moderate	Open
Dec 2022 _029	Leadership, Commitment and Accountability	Maintain the involvement of senior management, continue to increase the safety culture at all levels of personnel and strengthen the involvement of team leaders.	All	<ul style="list-style-type: none"> Formalise and simplify the inspections or visit required of Team Leaders. Support team leaders to perform more inspections on site. 	Moderate	Closed
Dec 2022 _030	Monitoring and review	The lack of responsiveness in managing fatality related actions should be a warning to those responsible for the HS system or Senior management.	All	<ul style="list-style-type: none"> In order to manage them more efficiently, fatalities related actions should be presented separately in the reporting tables and in the committee reports with the senior management, so that targets and actions are also presented separately. 	High	Open
Dec 2022 _031	Surface drainage, Kamsar	Preliminary surface drainage designs have either been rejected or misplaced. The planned upgrade of the surface water drainage system is well behind schedule	PS3	A timebound plan should be developed and the timeframes are fed into a revised Water Management Action Plan forecast, such that any slippage (if applicable) beyond January 2024 is known and communicated to lenders.	Moderate	Open

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
		and at risk of not being completed by January 2024.				
Dec 2022 _ 032	Drinking water quality at Fassaly Foutabhé	<p>Community members have complained that water from wells fitted with iron removal devices is not potable. Visual inspection of one well supports the complaint.</p> <p>Community members also claimed that minutes of meetings had not been shared (a claim disputed by CBG).</p> <p>The stream at Fassaly Foutabhé continues to be highly turbid during the wet season/periods of rainfall (see issue Oct 2021_022, Appendix 3).</p>		<p>CBG should prioritise close liaison with the community and SNAPE during further investigations and remedial works. CBG technical representatives should be present when SNAPE undertake maintenance/repair or sampling from wells in Fassaly Foutabhé and ultimately ensure that the mine affected communities (including others impacted by CBG's operations) have access to clean water. CBG should also use its best endeavours to ensure results of the water quality monitoring are shared by SNAPE with community members.</p> <p>The means for dissemination and posting of minutes should be clearly communicated and all minutes/records of dissemination should be carefully filed so they can be made available to interested parties upon request.</p>	High	Open
Dec 2022 _ 033	Noise	Noise monitoring campaigns at Fassaly Foutabhé have shown noise levels to exceed the night-time Project standards during one of the two campaigns (in October 2022). It is unclear whether the increased noise levels at night resulted from CBG's operations or other noise sources.		CBG has informed that investigations are underway to identify to source for the apparent noise increase at night. The IESC supports this and recommends CBG's findings are shared with lenders/IESC during subsequent site visits.	Low	Open
Dec 2022 _ 034	Hazardous waste storage, Kamsar	<p>Poor management of hazardous wastes was observed at:</p> <p>a) the designated hazardous wastes storage area; and</p>		a) The IESC acknowledges CBG's plans to upgrade the temporary hazardous waste facility. Nevertheless, in the interim, action should be taken without delay to improve poor practices observed in storage practices	Moderate (on the basis immediate corrective)	Closed

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
		<p>b) an informal location adjacent to the disused oil waster separator.</p> <p>These poor practices posed risks to human health (poor ventilation), fire hazards (dumping of old batteries with metals/combustible materials) and contamination of soil and water resources.</p>		<p>and thereby minimise the risks posed to workers and the environment.</p> <p>b) The IESC acknowledges immediate corrective actions were taken at the time of the site visit. Further effort is required to ensure proper clean-up of contaminated areas and that measures (training, personal responsibility and improved site inspection) are put in place to prevent a repeat occurrence of this type of poor practice.</p> <p>The disused OWS should be cleared of residual oils or repairs should be made to the roof to prevent ingress of rainwater.</p>	actions have been taken)	
Dec 2022 _035	Communicable Disease Prevention - Malaria	Malaria programmes implementation still lags behind.		Malaria Programme to be developed as a priority	Low	Open (actions in progress, awaiting campaign implementation. Item downgraded)
Dec 2022 _036	Communicable Disease Prevention - HIV/AIDS	<p>HIV/AIDS programme implementation still lags behind.</p> <p>In addition, based on the ToR, each annual campaign will take place in the 4th quarter of the year, between November and December.</p>		<p>HIV/AIDS Programme to be developed as a priority.</p> <p>Particularly in 2023, CBG not to wait for Q4-2023 to start the campaign as per indication in the ToR.</p>	Moderate	Open (actions in progress, awaiting campaign implementation. Item downgraded)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Dec 2022 _037	Community Health and Safety - Railroad Safety	Betafences are now customs free and ready to be installed though new requests from local authorities now require prioritization of a truck "parking area".		Betafences installation to be installed as a priority	Moderate	Open (Betafence installation started; approval yet to be get in Kamsar. despite CBG's engagement efforts. Item downgraded)
Dec 2022 _038	Community Health and Safety - Railroad Safety	Community concerns in relation to access to health centres, water planned to be managed via community development projects. Other criticisms exist on betafencing "dividing the city in 2 zones".		CBG to continue engaging local authorities and communities to manage expectations and mitigate potential opposition to betafencing and closely monitor the use of footbridges and acceptance by communities as the betafencing is erected. Attention to identify and record grievances concerning betafencing should be particularly paid. <ul style="list-style-type: none"> Also refer to March 2022_024 	Low	Open (lack of betafence's approval in Kamsar requires CBG to continue with engagement activities. The item is downgraded.
Dec 2022 _039	Community Health and Safety - Railroad Safety	Stepped footbridges do not enable access by disabled people who are unable to walk/climb steps.		As part of the wider Stakeholder Engagement Plan a more dedicated engagement with people with reduced mobility be organised to check for any specific concerns pertaining to railway crossing and footbridges. <ul style="list-style-type: none"> Also refer to March 2022_025 	Moderate	Open (though an introductory meeting has been held with a local association of PwDs a dedicated engagement be

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
						organized with PwDs to verify PwDs's opinion on footbridges, and the need of additional gates to respond to their needs is still required.)
Dec 2022_040	Community Health and Safety - Railroad Safety	Accidents involving animals more frequent in Sangarédi due to villages closer to the railway. Such accidents are recorded as grievances only (if received).		CBG to start recording animal accidents due to railway crossing to ensure appropriate monitoring.	Low	Closed
Dec 2022 - 041	Hamdallaye Resettlement Site	Land tenure is not yet secured for Hamdallaye new village with consequences of: <ul style="list-style-type: none"> i. lack of land securitisation for the PAPs; ii. impossibility to conduct the final acceptance of the houses by the PAP iii. impossibility to transfer the management of the village to the Commune. 	Operations	CBG has developed a way to address this issue. Complete the land tenure formalization and securitization process as per schedule agreed between the CBG Resettlement and Legal teams.	Moderate	Superseded (Jun 2023_031)
Dec 2022_042	Fassaly Fouthabé	Fassaly Fouthabé has officially requested to be resettled	Operations	Prepare a long-term assessment of the situation of the cumulative impacts of mining and hauling around Fassaly Fouthabé using ArcGIS, consult with the community and make a decision to respond to the request.	High	Open

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Dec 2022 – 043	Hamdallaye and Fassaly Fouthabé RAP – Livelihood Restoration	Current activities do not meet their intended objectives	Operations	<ul style="list-style-type: none"> Acknowledge the reluctance of members to continue with the bakery, small ruminants and grasscutter (in Hamdallaye for the latter) and consult with Community to close these activities. Maintain market gardening and poultry activities but rethink model, and potentially finding a partner. Broaden the scope of livelihood restoration to more non-agricultural activities. Target the youth through employability and vocational training. 	High	Open (decision made to find a new implementing partner but not done yet)
Dec 2022 - 044	Resettlement Policy Framework (RPF)	The updated Resettlement Policy Framework (RPF), including updated compensation matrix, has been pending validation for more than two years	Operations	<ul style="list-style-type: none"> Follow process agreed during the IESC site visit: 1/ new CBG proposal for compensation of customary land acquisition 2/Lenders to review the remaining parts of the last version of the updated RPF 3/phone call between CBG, lenders and IESC to definitely validate the updated RPF Include RPF in the roadmap with RAP/LRP as action plans 	High	Superseded (Jun 2023_030)
Dec 2022 – 045	Other LRPs	Thiapikouré, Kankalaré, Contingency blocks and MUOA LRPs have been contracted and are in a diagnosis/program design phase	Operations	<ul style="list-style-type: none"> Consider complementary livelihood restoration activities specifically targeting youth (employability, vocational training) Ensure coordination between the LRP implementer and CBG biodiversity team Consider new transitional support to bridge the revenue gap until IGAs activities are operational 	Moderate	Superseded (June 2023 -036 focusing on transitional support) (open for the transitional support)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Dec 2022 – 046	Grievances	Land takeover during land stripping activities is accounting for a large number of grievances	Operations	Implement identified mitigation measures and monitor related grievance evolution	Moderate	Partially close/open (monitoring of next period grievances before closing)
Dec 2022 – 047	Cumulative impacts	Several communities appear to be surrounded by mining activities in current mine plan	Operations	<ul style="list-style-type: none"> Prepare a long-term assessment of the situation of the cumulative impacts of mining and hauling around the communities that were listed as villages potentially affected by a physical resettlement by 2022 in the 2015 RPF Conduct assessment in coordination with the Biodiversity team Minimize footprint as per IFC PS1 requirements 	High	Open

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
March 2022_001	CR Team: Resources	Most of the engagement activities (and thus grievances) are taking place in Sangarèdi. The distribution of members of the team between Sangarèdi and Kamsar does not correspond with the actual workload. Engagement activities in Sangarèdi currently require additional resources due to volume of activities being undertaken.	All	Consider revisiting current staff distribution between Kamsar and Sangarèdi. Some of the senior positions currently located in Kamsar should be placed in Sangarèdi along with the incoming recruitment.	Moderate	Open (Recruitment is ongoing with attention to distributing resources in Kamsar and Sangarédi. The item will be closed once all planned)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
						personnel is appointed.)
March 2022_004	SEP and Grievance Management Mechanism	The 2022-25 SEP and GMM need to be revised by CBG as per the IESC's/Policy Lenders remarks.	All	CBG to revise and update SEP and GMM as per the IESC's remarks. <i>Post visits note: Draft SEP and GMM updated and near finalised.</i>	Moderate	Open
March 2022_005	Management of Change	Limited progress has been made since the previous October 2021 Monitoring Report in terms of the wider understanding and implementation of the MoC Procedure.	All	<p>CBG should continue to finalise the MoC Action Plan and roll out the measures therein as a matter of priority.</p> <p>In addition, the IESC further recommends that:</p> <ul style="list-style-type: none"> The new Operations Director assumes a direct responsibility for expediting the implementation of the MoC Procedure. <p>Systems are put in place to make adherence to management of change mandatory. For example, purchases could be blocked unless evidence is provided that change management was considered as part of any Purchase Order approval.</p>	High	Open (however the IESC notes good progress has been made)
March 2022_006	OHS Performance	Management of leading indicators (near misses and safety observations) is insufficient.	All	<p>Classification of OHS events – CBG should disaggregate the data on high potential near misses from safety observations to provide an accurate report on actual near misses and to track trends for these events.</p> <p>Leading indicators - CBG should identify and track a suite of leading indicators (e.g. events with high severity potential, completion rate for mandatory training, closure rate for corrective actions, number of near misses) that provide a clear understanding of safety-related issues before they develop into significant incidents.</p>	Moderate	Partially closed/ open (Classification of OHS events is closed but management and use of leading indicators is still in progress)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
March 2022_ 007	OHS Training	<p>The training management tool is not adapted to CBG; there is no system for tracking out-of-date certifications and training courses and the tool used to monitor training is too basic.</p> <p>There is no formal verification of trainees' understanding at the end of safety induction training.</p>	All	<ul style="list-style-type: none"> • Training management – Establish an appropriate system or more efficient tool (e.g. automatic reminders for refresher training, tracking out-of-date certifications, list of employees eligible for training based on roles). This will ensure that only personnel with up-to-date certification and training are assigned to perform critical operational and maintenance tasks. • Golden Rules and safety inductions – The Golden Rules should be presented at all safety inductions and periodically to both direct employees and contractors/subcontractors. Safety inductions, like all internal and external training exercises, must be validated verified by a Q&A or a comprehension test at the end. <p>The training plan should include specific training for OHS Teams and for Managers.</p>	Moderate	Partially closed/ open (OHS Training will be integrated on the IsoMetrix database ; The Golden Rules are included on safety induction)
March 2022_ 008	Risk Management and Control of Work	Low control of OHS risks during the execution of tasks, as confirmed by numerous findings during site visits (including in relation to blasting operations, surface miner, traffic on the mine, railway, waste storage (Torabora), lifting operation on jetty, Kamsar Plant)	All	<ul style="list-style-type: none"> • Blasting operation: <ul style="list-style-type: none"> ○ An official and more-structured control system (including a checklist for the contractor and checklist for CBG) should be established for use before and after blasting and kept on site. CBG need to confirm that all personnel present at the mine are aware before validating the blasting. • Surface Miner: <ul style="list-style-type: none"> ○ The contractor needs to have (on site) HSE documentation relevant to ongoing site 	High	Open/ Ongoing (items struck out are considered closed)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				<p>operations/activities and require their employees to wear hearing protection on site</p> <ul style="list-style-type: none"> • Traffic on mine: <ul style="list-style-type: none"> ○ Physical separations between community traffic lanes and mine haul roads need to be provided whilst clear markings/signs, informing individuals of the danger and prohibition to cross, need to be established/installed. Road signs for mine trucks need to be reinforced and a way to improve drivers' knowledge of the traffic plan needs to be identified and implemented. • Kamsar Plant: <ul style="list-style-type: none"> ○ HSE documents must be kept in the workplace at all times, the frequency and media of communication regarding the CBG Golden Rules needs to be increased and improved, the proper use of safety guards on moving equipment needs to be improved. ○ CBG should update its permit to work procedure to ensure that operations personnel are responsible for permit issuance, approval and post-completion review of tasks. The HSEC teams should strictly perform compliance assurance against the established control of work standards. This is critical to driving line management accountability for the safe conduct of high-risk activities. ○ CBG should complete operational procedures where these are missing, such as for the 		

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				<p>BuMS, as well as prepare baseline operational risk assessments, prepare a risk register and communicate these to all personnel (both direct employees and contractors). The MUOA Project risk register should also be updated.</p> <p>CBG should prioritise completing a man-machine interface risk assessment and implement appropriate engineering and administrative controls to achieve safe segregation of pedestrians and mobile machinery/equipment at Kamsar and Sangarédi.</p>		
March 2022_009	Incident Investigations & Root Cause Analysis	Concreted efforts and resources should be provided for timely close out of pending actions arising out of the 2021 significant incidents.	All	<ul style="list-style-type: none"> CBG should define the composition of the team in charge of incident investigations and root cause analysis (HSEC, Worker, Manager, Direction, members of a workshop or similar facility...) and train them. <p>CBG should ensure prompt closure of corrective actions following approval of incident investigation reports. Concrete efforts and resources should be provided for timely close out of pending actions arising from the 2021 significant incidents.</p>	High	Partially closed/open (items struck out are considered closed)
March 2022_010	Maintenance & Asset Management	Poor maintenance of equipment (safety technologies upgraded slowly).	All	<p>CBG should review maintenance and asset integrity in detail (including electrical installation and moving/rotating equipment).</p> <p>The item remains open, however the IESC does acknowledge significant progress in the planned maintenance/repair of the Dryers following a comprehensive external audit of these assets in 2022/early 2023.</p>	High	Open/ Ongoing

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
March 2022_ 015	Air Quality – fugitive dust emissions	An evaluation of dust suppressants has been ongoing for several months. Dust generating activities are an inherent issue for CBG's activities both at the mine and port locations.		<p>CBG should expedite studies not the use of commercial dust suppressants and explore opportunities to use these and other techniques to further reduce fugitive dust emissions including:</p> <ul style="list-style-type: none"> • efforts to minimise large accumulations of dust should be increased, and • application of dust suppressants at Kamsar evaluated following completion of the ongoing dust suppressant study 	Moderate	Open (efforts to reduce fugitive emissions ongoing)
March 2022_ 016	Oil Water Separator, Kamsar	Whereas material progress has been made in identifying and initiating a solution, the oil concentrations in treated effluent remain above Project Standards at the time of the site visit.		Full implementation of the agreed oil/water separator corrective action plan	High (pending implementation of the corrective action)	Open (ongoing implementation of action plan)
March 2022_ 017	Sangarédi WWTP	The new UV treatment plant at the Dounsey WWTP has been commissioned, however coliforms are still being detected. The sludge tanks have not been emptied although a contractor has been identified. This is a long overdue action.		<p>Performance of the UV treatment plant should be investigated and optimised (as is the current CBG intention).</p> <p>Emptying of the sludge tank should be prioritised and any performance improvement at the WWTP recorded.</p>	Moderate	Open
March 2022_ 018	Surface water discharge - Kamsar	Elevated COD levels and suspended sediments were recorded in surface river water surrounding the Kamsar processing facility. Surface water discharge channels (fed by dewatering of the primary crusher pit), that were heavily laden with fine sediments, were observed discharging to		The causes of elevated levels of contaminants should be investigated and were found to be a result of CBG's activities, actions to identify source of contaminants/improve quality of discharge should be identified.	Moderate	Superseded

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
		the River Dougoufisa with no apparent sediment trap in place.				
March 2022_ 019	N&V impacts	Noise levels taken from various rail and mine locations are generally high, however it is not clear whether the noise is generated by CBG activities or other background sources unrelated to CBG's activities.		Further interpretation of N&V monitoring results is required, particularly where there are apparent exceedances of Project Standards to determine whether noise levels are attributable to CBG activities and therefore require mitigation. Measured results should also be compared with background levels and the 3 dB increase above background limit taken into consideration when assessing compliance with applicable standards. Factors influencing noise levels, including both CBG noise and other noise sources should be described and used to define any corrective actions where necessary.	Moderate	Open
March 2022_ 023	Hommes Piquets	Based on the IESC's impromptu meetings with Hommes Piquets it was found that lacked information and authority to perform their duties, including: <ul style="list-style-type: none"> • No train timetable • No means or authority to stop the train in an emergency situation • Poor understanding of their own risks 		The hommes piquet need to be better trained and supervised. They should be more aware of emergency procedures and their roles and responsibilities. CBG should use an official and more-structured control system for rail activities. CBG need to confirm that all personnel present along the railway are aware before the passage of trains. Kilometre posts need to be installed, alongside railway signs for the communities, and a way to communicate the train schedule to the hommes piquet needs to be identified and implemented. All hommes piquet should be issued with VHF radio/other means of communication such that they can communicate with the train driver. Training in Railway Safety Communications Procedures, as prescribed in the Road and Rail Safety Management Plan, should be provided.	Moderate	Open (A new automation system is being implemented and training has been provided but the working conditions are the same)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
March 2022_ 025	MUOA Project	Use of stepped footbridges will prevent their use by people with physical disabilities. People unable to climb and descend steps will have to use level crossings.	Operations	Engage with communities to evaluate the number and residence of persons with reduced mobility (e.g. due to age or physical disability) that will not be able to use the footbridges. Explore mitigation measures to alleviate risk of pedestrian accidents, including physical separation of vehicles and pedestrians at level crossings.	Minor	Open
March 2022_ 028	Hamdallaye Resettlement Site	Drainage issues partially fixed but some problems remain, resulting in localised flooding, with potential damage to structures as a result.	Operation	Monitor potential flooding during the rainy season and plan corrective works accordingly.	Minor	Open (waiting for the end of the 2023 rainy season to assess results of last corrective work)
March 2022_ 029	Hamdallaye Resettlement Site	Lack of satisfactory waste collection at Hamdallaye Resettlement Site	Operations	Facilitate the establishment of a sustainable solid waste collection and elimination system and engage the Hamdallaye Resettlement Committee and community members in this respect.	Moderate	Superseded
March 2022_ 030	Hamdallaye Resettlement Site	There are numerous requests from the Hamdallaye Resettlement Committee with respect to community infrastructure	Operations	Manage certain unreasonable expectations from the Hamdallaye Resettlement Committee with respect to community infrastructure, strengthen management capacity, and finalise the handover accordingly, based on clear and consulted upon modalities.	Moderate	Superseded
March 2022_ 032	Fassaly Fouthabé	School constructed as per the RAP but remains unstaffed.	Operations	While continuing to liaise with the local education directorate to obtain allocation of teachers for the school, explore alternative avenues with the community (e.g. "maîtres communautaires").	High	Open

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
March 2022_ 037	Resources for resettlement implementation	The capacity of the CBG Resettlement Team remains weak with regards to the tasks at hand	Operations	<ul style="list-style-type: none"> continue to increase staffing within the Resettlement Team with a focus on livelihood restoration; create a monitoring and evaluation / data management function within the Resettlement Team; seek to establish a better gender balance within the Resettlement Team, and train staff members (both male and female) on basic gender sensitivity; seek better integration of the CR and Resettlement Teams; and clarify positions and titles within the Resettlement Team and secure a long-term Resettlement Manager responsible for leading the team. 	High	Superseded

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Oct 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 IMS	All	<p>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.</p> <p>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</p>	High	Superseded (Dec 2022_027) CMP Coordinator has been appointed. Effectiveness of role to be

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
		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.		contract award) and actual safe working practices on the ground.		further assessed in subsequent site visit.
Oct 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	Open (database specialist not appointed at time of June 2023 site visit)
Oct 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	Moderate	Open/ Ongoing (Points have been taken into consideration in the 2023 training plan - yet actual schedule and training are yet to be rolled out and monitored)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				topics/events (perhaps a maximum of 10 topics/events)		
Oct 2021_008	Revision of Environmental Management Plans including the Contractor Management Plan (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 March 2021_007.</p>	Moderate	Superseded (concerns over procurement delays have eased)
Oct 2021_009	Female participation in stakeholder meetings	<p>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.</p>	All	<p>Consider implementing one or more of the following options:</p> <ol style="list-style-type: none"> 1. Identifying informal/formal female associations in the villages such as womens' farming/gardening groups and then organizing meetings; 2. Organizing meetings in the fields where groups of women may be working together (in rest periods and not interfering with work regimes); and <p>Random walks in villages and to/from agricultural areas to engage in informal conversations with individuals or small groups of women</p>	Moderate	Open (Focus Groups Discussions with women held though additional time and actions (e.g. on GBV-SH) are needed to close this finding)
Oct 2021_011	Grievance mechanism	<p>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</p>	All	<p>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</p>	Moderate	Open (IFC Advisory training yet to be deployed)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Oct 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>	<p>Moderate Low (re-categorised on the basis of work in progress.</p>	<p>Open (pending 2022 dredging campaign complete/results of surveys available)</p>
Oct 2021_ 013	Land Rehabilitation and Relinquishment	<p>CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues, despite the Mine Rehabilitation and Conceptual Closure Plan (MRCCP) presenting priority actions to begin by end 2018 (with one to be completed by end 2018)</p>	Operations and Decommissioning	<p>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</p>	<p>Moderate</p>	<p>Superseded</p>
Oct 2021_ 016	Management of suppliers	<p>The roll-out of LWC requirements does not yet extend to suppliers</p>	All	<p>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)</p>	<p>Moderate</p>	<p>Open</p>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Oct 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 <p>Integrated into the design and implementation of a monitoring/auditing process, focused upon contractor performance, plus inputs to corrective actions and judgements on 'close out'.</p>	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 <p>The HR Manual, WGM and Code of Ethics to be provided in all RfPs.</p>	High	<p>Open (understood to be work in progress - to be assessed in next IESC visit)</p>
Oct 2021_ 018	Environmental Monitoring Programme	<p>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.</p>	All	<p>Further effort is required to ensure full implementation of the EMoP and monitoring components of the environmental management plans, including:</p> <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 	Moderate	<p>Partially closed/ superseded (items struck out are considered closed)</p>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				Disclosure of monitoring results to affected communities in an appropriate and meaningful format.		
Oct 2021_021	Air quality – commissioning of old power generating units	Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators located in the original Kamsar central powerhouse by 2020. The IESC understands the old generators are no longer being used, however, they have not been decommissioned.	All	CBG should explain why the power generators have not been decommissioned to date.	Low (as long as old generators are not used)	Open (decision to decommission generators is under evaluation, although CBG confirmed no intention to re-start these units)
Oct 2021_022	Water quality - mine effluents	A spring used by Fassaly Foutabhé community members appears to have been adversely affected by CBG’s mining activities.	All	CBG should investigate the causes of the contamination and, if found to be a result of CBG’s activities, implement corrective measures to restore the quality of the spring water or ensure a replacement water supply for Fassaly Foutabhé in the event the spring water quality cannot be restored.	Moderate	Open (filter dykes failed – CBG seeking support from Alcoa specialists))
Oct 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.	All	CBG should expand its survey of the sewage drainage network to identify locations prone to rainwater ingress and repair elements prone to rainwater ingress. 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.	Minor	Open unless struck out (network surveyed and repairs made Commissioning of flow meter pending)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Oct 2021_024	N&V impacts	<p>Review of noise and vibration management has identified the following issues:</p> <ol style="list-style-type: none"> 1) Noise monitoring has been hampered by broken and malfunctioning equipment/software. 2) Monitoring at specific sensitive locations along the railway has not occurred. 3) There has been repeated exceedances of airblast overpressure limits in 2020. 	All	<p>Confirmation of the efficacy of measures put in place is required as follows:</p> <p>Article I. Expedite receipt of ancillary equipment and initiate use of the new noise meters at the earliest opportunity.</p> <p>Article II. Further monitoring is required at specific sensitive locations along the railway. Noise and vibration measurements should be taken at a setback distance from the railway line that is equivalent to that of the sensitive receptors.</p> <p>Article III. CBG should engage with potential affected residents at these locations to determine the level of disturbance currently caused.</p> <p>CBG should confirm through monitoring data that measures to meet airblast overpressure limits have been successful</p>	Moderate	<p>Partially Closed (items struck out are considered closed)</p> <ul style="list-style-type: none"> • Noise meters arrived • New monitoring locations along railway • Additional overblast data is encouraging)
Oct 2021_025	Waste management	<p>Progress in the implementation of the waste management Action Plan continues with a significant number of actions no longer relevant or behind the original schedule specified in the action plan.</p> <p>Community attitudes towards CBG's use of Bendougou have not been evaluated by the CBG CR Team. The level of risk of community objections/blockades, similar to those that occurred in the past, is therefore unknown.</p>	All	<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> <ul style="list-style-type: none"> - Also, the CR team to engage with the affected community members prior transportation of wastes to Bendougou. 	Moderate	<p>Open</p>

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
Oct 2021_ 026	Hazardous materials management	Radioactive lightning rods are present on CBG facilities. These are prone to decay and damage over time and therefore need to be carefully managed. Currently CBG's plan for ultimate dismantling and disposal of these radioactive sources is undefined.	All	A longer-term solution for the safe dismantling and disposal of radioactive lightning rods is required as per action 4.18 of the HAZMAT Action Plan. The Waste Management Plan will also require update to include the disposal route(s) for this waste.	Minor	Open (disposal plan scheduled for mid-late 2022)
Oct 2021_ 027	Energy efficiency/GHG emissions	CBG is refining its SOP for GHG emission monitoring and reporting.	All	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	Open (procedure schedule for June 2022 – open pending review of 2022 AMR)
Oct 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	HOLD
Oct 2021_ 038	Monitoring (CRPF)	CBG has developed preliminary framework for monitoring. This framework is not consistent with the "Monitoring" chapters in the CRPF and the LRPs, and, also, it mostly focuses on progress indicators and not outcomes	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	High	Open (item partly superseded by item March 2022_035, in turn superseded

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				team and resource it accordingly (at minimum, one full-time staff member)		by Dec 2022_044)
Oct 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	Open (unless struck out) Ongoing with progress being made
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)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
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	Unamended 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_ 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 CBG considers ways in which women can be encouraged to submit grievances directly and not only via male relatives or male community members.	Minor	Open (CBG continues to 'test' options to increase female participation)
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	HOLD (to be revisited in future site visit)
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.	Low	HOLD (to be revisited in future site visit)
March 2021_ 022	Integration of LWC requirements in bid evaluation and	Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are:	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, 	High	Open (updated Contractor Management

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
	contractor management	<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'.		participates in the Evaluation Committee meetings and is a signatory to the Committee's decision/s; <ul style="list-style-type: none"> • 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.		Plan under finalization, though not yet ready)
March 2021_027	N&V impacts – rural areas adjacent to railway	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. A final solution could involve resettlement of affected parties. CBG should ensure alternative mitigation measures are identified to avoid resettlement.	PS3	The IESC recommends the following actions are completed: <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 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.	High	Open (unless struck out)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
March 2021_ 036	Hamdallaye livelihood restoration	Crops have been affected by pests. The benefit of the 2-year fallow period on the 56 Ha is questionable if no other measures apart from provision of topsoil are taken to improve fertility.	Operations	Ensure that CECI mobilizes appropriate agronomy expertise and consider alternative crops with better resilience to pests and mixed crops and consider use of phosphorus and potassium fertilizers, as well as “green fertilizers”) to enhance the fallow period.	Moderate	Open (to be checked during the next site visit)
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	Open (Draft SEP for 2022-2025 was with CBG consultants at time of visit)
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 (site evacuation was not communicated during site visit safety briefing)
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.	Low	Open (A training on Security and Human Rights, held on April 5 2023, targeted responsible departments, private security

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
						companies contracted by CBG and public security CBG to further verify training provided to security guards following the quick audit of working conditions of security guards).
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

