



Bridge 5 Culvert – IESC Visit March 2023

Guinea Alumina Corporation Conakry, Republic of Guinea

GAC PROJECT

IESC Monitoring Report: Tenth Monitoring – Site Visit March 2023

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ABBREVIATIONS AND ACRONYMS

AfDB	African Development Bank
ARRC	Avoid-Reduce-Restore-Conservation Task Force (IUCN)
BAP	Biodiversity Action Plan
BEN	Bauxite Environmental Network
BMEP	Biodiversity Monitoring and Evaluation Plan
BMP	Biodiversity Management Plan
BOSIP	Biodiversity Offset Strategy and Implementation Plan
CAGF	FODEL Management Support Committee (Comité d'Appui à la Gestion de FODEL)
CBG	Compagnie des Bauxites de Guinée,
CBNRM	Community-Based Natural Resources Management
CE	Critically Endangered (on IUCN Red List)
CEO	Chief Executive Officer
CERE	Centre for Environmental Studies and Research (Centre d'étude et de recherche en environnement)
CFB	Chemin de Fer de Boké
CHA	Critical Habitat Assessment
CIS	Community Investment Strategy
CLO	Community Liaison Officer
COPIL	Comite de Pilotage
COVID-19	Coronavirus Disease 2019
CR	Community Relations
E&C	Environment & Community
EBZ	Environmental Buffer Zone
EcoS	Ecosystem Services
EDC	Export Development Canada
EGA	Emirates Global Aluminium PJSC
EHS	Environmental, Health and Safety
EHSMS	Environment, Health and Safety Management System
EMP	Environmental Management Plans
EMS	Environmental Management System
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESMP	Environmental and Social Management Plans
ESHS	Environmental, Social, Health & Safety
FODEL	Local Economic Development Fund (Fonds de Développement Economique Local)
FOOS	First Ore On Ship
GAC	Guinea Alumina Corporation SA
GCM	General Control Measures (in BMP)
GIIP	Good International Industry Practice
GIS	Geographic Information System
GBV	Gender Based Violence
HC	Human Capital
HR	Human Resources
H&S	Health & Safety
HSE	Health, Safety and Environment
IAS	Invasive Alien Species

IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IUCN	International Union for Conservation of Nature
IUCN/SSC PSG SGA SSA ARRC	IUCN Species Survival Commission, Primate Specialist Group, Sections on Great Apes and Small Apes, Avoid-Reduce-Restore-Conservation Task Force
KBA	Key Biodiversity Area
KPI	Key Performance Indicators
LACRF	Land Acquisition, Compensation and Resettlement Framework
LARF	Land Access Request Form
LTI	Lost Time Injuries
LTIFR	Lost Time Incident Frequency Rate
MBNP	Moyen Bafing National Park
MBZ	Mohamed bin Zayed (Species Conservation Fund)
MBOP	Moyen Bafing Offset Program
MIGA	Multilateral Investment Guarantee Agency
MoU	Memorandum of understanding
NGO	Non-Governmental Organisation
NG	Net Gain
NNL	No Net Loss
OHS	Occupational health and Safety
OS	Operational Safeguard
PAP	Project Affected People
PDS	Pre-Disturbance Surveys
PFS	Pre-Feasibility Study
PIIM	Project Induced In-Migration
PS	Performance Standard
RAP	Resettlement Action Plan
RO	Reverse Osmosis
SCM	Species-specific Control Measures (in BMP)
SEIA	Social and Environmental Impact Assessment
SEP	Stakeholder Engagement Plan
SHE	Safety, Health, Environment
SHEC	Safety, Health, Environment, and Community
SMP	Security Management Plan
SMS	Social Management System
SNAPE	National Water Service (Service National des Points d'Eau de Guinée)
SOP	Standard Operating Procedures
SPV	Special purpose vehicle
SRA	Security Risk assessment
SSC	Species Survival Commission
STP	Sewage Treatment Plant
SYDEV	Synergies and Development (an NGO)
TBC	The Biodiversity Consultancy
ToR	Terms of Reference
USC	University of the Sunshine Coast, Australia (mangrove restoration review)
USTG	Union of Workers of Guinea 'Union Syndicale des Travailleurs de Guinée'
WCF	Wild Chimpanzee Foundation



WHO	World Health Organization
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EXECUTIVE SUMMARY

RINA Consulting S.p.A. (formally D'Appolonia), has been appointed to act as the Lenders' Independent Environmental and Social Consultant (IESC) to monitor the construction and operational phase of the Guinea Alumina Corporation (GAC) Project. The IESC scope is to assess compliance with the Environmental and Social Management Plan (ESAP) and the Environmental & Social Requirements of the Project during the life of the loan agreement and Multilateral Investment Guarantee Agency (MIGA) guarantee of the GAC 'Project'. Specifically, the IESC is tasked with undertaking Environmental, Social, Health & Safety (ESHS) monitoring throughout the construction and operation phases of the Project, to verify whether Project plans and procedures and Lenders' environmental and social requirements (including International Finance Corporation (IFC) Performance Standards); applicable IFC Environmental, Health and Safety (EHS) Guidelines, African Development Bank (AfDB) safeguards policy), are properly implemented at field level during the ongoing activities

The Project includes the mining of bauxite within GAC's concession in the Boké province of Guinea, the operation of a port terminal with an offshore export berthing facility at Kamsar, and railway spurs connecting the bauxite mine and the port terminal to the existing railway system. The Project entered the start of Operations on the 30th July 2019, and is now fully operational with a focus on improving efficiencies and progressively increasing the annual throughput increasing exports from 11.5 Mt in 2021 to approximately 14 Mt in 2023, with plans for 15 MT in 2024 and 20 MT by 2027.

This report presents the IESC's findings of the Project status at the time of review of the tenth monitoring event post financial close. This audit followed the same format as the last, being conducted through a series of in person interviews (with some GAC team joining selected meeting using Microsoft Teams), combined with a series of discipline specific field visits. The site visit was undertaken between the 26th March and 1st April 2023, with a wrap-up session on Friday 31st March 2023, with the lenders and IESC departing for Conakry early on the 1st April. Limited data was provided in advance of the site visit, with additional information requested after the site visit, with the documentation cut-off date the 15th April 2023, to provide the IESC more clarity or verify several discussion items.

Once again, the site visit enabled the IESC to continue our detailed discussions with GAC's management team, on its management systems and operations, along with collaborative discussions of current issues and challenges as well as future ESHS plans. As with previous audits GAC's team were open and supportive of the audit and its outcomes, with the site walkovers allowing a detailed review of local area compliance.

Following this review, it is the IESC opinion that GAC has now closed out 45 of the 48 ESAP items noted during the 2017 Due Diligence process. There are three remaining ESAP items where the IESC has concerns about the delays in issue resolution – these are presented in ESAP-format in Annex A to this report and detailed further in relevant report sections and the Issues Table of current non-compliances (Section 2).

SHEC¹ Management

At the upper level there are separate reports for Health, and Environment and Communities to the CEO, H&S and Security report to the COO along with the directors for the mine and the port operations. Both the CEO and COO have a long history with the project and have specific SHEC responsibilities.

At the time of the last audit, the management structure for the Environmental, and Community Relations teams in the overall Safety, Health, Environmental, and Community Relations (SHEC) structure was in the process of being refined. This refinement proposed new structure of the environment team addressed discrepancies in the hierarchy of the team and the reports to the manager. However, this change was not formalised before the E&CR Manager departed. Since then, the Environment Manager has been replaced and the responsibility for Community Relations taken on by the Deputy Directeur General, while this means that GAC has formally moved away from there being a common manager for E&C, the IESC noted that the benefits of a combined management position had not been achieved under the previous arrangement.

The IESC recommends that the new Environment Manager does not undertake a further review of team structure etc. until they had been in position for at least six months and maintains the core sub-teams managing Environmental Monitoring & Compliance, Land Use Management & Rehabilitation, and Biodiversity (also linking to Moyer Bafing team). The environment team members, who are considered by the IESC to be very competent, have

¹ The document uses the term SHEC (Safety, Health, Environment, and Community) as used by GAC, which is equivalent to the traditional ESHS (Environment, Social, Health & Safety).

not changed and the IESC noted that they continue to have clarity on their roles and took ownership of environment management and duties.

Safety continues to be run by the HSE Manager who reports to the COO. The position of Chief Medical Officer (who reports to the CEO as is required by EGA) oversees medical staff and offices (including ambulances) at the Mine and the Platform/Port was vacant at the time of the monitoring visit. The Environmental and Community Managers reports to the CEO. The IESC consider that this structure works well and the managers are competent and progressive.

The Biodiversity Team, without a Biodiversity Specialist incumbent in role since early 2022, continue to be supported by personnel from external consultancy Okapi. However, following the site visit, the IESC were informed that the 12-month Okapi contract was about to be imminently curtailed, so this again places the Biodiversity Team in a state of flux.

Currently, the social management function is divided in two main areas: Community Relations, directly reporting to the Deputy Director General and Social Investment reporting to the Communications and Corporate Social Responsibility Department. The Community Relations Manager has five reporting lines: stakeholder engagement, resettlement and post-resettlement, livelihood restoration and compensation, grievance management, and influx management and livelihood.

GAC's Environmental Management System (EMS) and Social Management System (SMS) procedures were previously completed and uploaded/integrated to EGA's SharePoint DMS, however this meant that GAC did not have the documents locally under its control. The process of updating the documents and moving the Operational Environmental and Social Management System (OESMS) on to a local GAC server has been relatively slow. As previously observed the documents held on SharePoint while largely all present, need to be better organised. Not least there is a need to store the data files separately from the structure of the management documents. As previously observed part of the issue is that the environment team had been moving away from platforms like Borealis for data management (following the loss of a super user in the team and licence issues) and was considering moving off SAP for incident tracking. Based on discussions the Environment team is now looking at reclaiming the Borealis licence and getting adequate training to use that. The IESC recommends that if this is not feasible then the Environment team should follow the H&S team with adopting VelocityEHS as a platform given that there are super users being developed within GAC, it has internal IT support, and does not have the licencing issues associated with Borealis (the IESC notes that Borealis is still effectively used by Communities).

GAC continue to receive direction and training from their management systems consultant (THOR) and that the programme developed for the next three quarters draw on findings from the ASI audit and the IESC.

The IESC recommend GAC provide clarification whether they anticipate that a further ESIA Addendum/Addenda are necessary so as to comply with Guinea's ESIA regulations relating to any activities currently being undertaken or planned in the north of the concession (including opening up access roads etc.) – the 2015 ESIA Addendum related only to activities in the southern concession, and the original 2008 ESIA for the north will be out of date.

Environment

The proposed improvement to the environment team structure to formally separated it into the core disciplines of environmental monitoring and compliance (incorporating, waste and resource management), biodiversity, and rehabilitation (including erosion control) has happened in practice, but it has not been formalised through human resources. This should be addressed so as to provide certainty to the team on their roles and responsibilities.

Based on the environmental score card² and discussions during the visit, GAC's environmental performance has been good with no regulatory notices or major environmental released in the first two months of 2023. This continues a trend from 2022. There were two minor incidents recorded in 2023 up to the end of February (one in January and February). The most common incidents are minor fuel spills with contaminated soils removed for bioremediation at the Tinguilinta waste management area.

GAC continues to track its resource efficiency, tracking its energy intensity, GHG intensity, and land use intensity, against Bauxite Industry Benchmarks as well as comparing it to the previous years' performance. Water intensity is compared against a GAC target and the previous year's data. Of these GHG intensity and land use intensity are above the Bauxite industry benchmark, although both appear to be generally below the values for 2022, indicating continued improvement. This data feeds through into the publicly disclosed data in EGS's sustainability report³,

² page 40 on the February 2023 Monthly Report

³ <https://www.gacguinee.com/media/3183/ega-2021-sustainability-report-en.pdf>

which includes the commitment to net zero in 2050. The recording and disclosure of this data was noted in the ASI certification report. The KPI sheet also tracks land management (permits, land cleared etc.) and biodiversity and restoration, as well as training and awareness.

Monthly Scope 1 GHG emissions have been increasing and were over 7,032 t CO_{2eq} in December which reflects the highest fuel use in a month at the Project, with the total Scope 1 emissions for 2022 of 73,617 t CO_{2eq} (the total in 2021 was 64,710 t CO_{2eq}). While absolute values are increasing due to the increasing exports the energy intensity (i.e. energy per tonne of product) is decreasing indicating an increasingly efficient operation.

The period since the ninth IESC monitoring visit, has been largely covered by the dry season and water use has ranged from 26,114 to 39,828 m³/month for the months of November to February 2023 (which is higher than a year earlier). This equates to an average water intensity over these months of 0.025-0.034 m³/t of ore exported which is higher than the equivalent months in 2021, and significantly lower than the industry average of 0.404 m³/Mt.

The IESC reiterates its observation that now GAC has water metering data from the desalination plant, as highlighted in previous ESDD reports GAC should move to track water use around the Kamsar platform as this is derived through the relatively energy intensive reverse osmosis system (RO) desalination plant. The KPIs for this water use should include the cost / energy consumption (or GHG emissions) per litre of water.

GAC has continued to attempt to undertake flow monitoring in the Tinguilinta however the data has a number of issues, of these the most significant are the lack of monitoring at all of the points, and inferred variation/error bars in the flow calculations. Both of these issues are partially due the IESC suspects due to the lack of vehicles to enable a short, dedicated campaign, and the latter issue may also be connected to the underlying calculations of flow rate, river profile etc. The IESC recommends that GAC review the flow monitoring programme and its objectives along with its regulatory commitments (in the ESIA etc.), and based on this review refines the programme, and also revisits the underlying assumptions for the flow calculations to ensure that the calculated flow rates are defensible and robust, and provide GAC with the data it needs.

The waste management area on the Kamsar Platform was observed to be operating well (including the incinerator) and no issues were identified. At the Tinguilinta waste management area the operations were observed to have continued to operate to a high standard and the incinerator was operating. Other wastes were well managed and GAC has continued to use the contractor CEGEDI (who were established in early 2022) to remove waste which it sorts so as to recover recyclable wastes, and store the remainder until its private landfill is constructed. This company is based in Conakry and GAC undertakes regular audits of the facilities with the last audit report being on 16th February 2023. Based on GAC's feedback these audits have identified a number of improvements which it is reported that CEGEDI is addressing.

GAC has continued the monthly air monitoring of particulate matter (PM_{2.5} and PM₁₀) no issues were reported regarding compliance with the 24-hour limit, and the data provided for 2022 shows no exceedances. During the monitoring visit the use of dust suppression by water around the mine roads was noted and dust was not considered to be an issue on any of the routes driven by the IESC team. The IESC visited the fixed continuous air monitoring station at Béli Kindy which is looked after by a member of the community. This data is managed through the Dust-a-side website which sends alerts to phone and emails when there is an exceedance, although the Béli Kindy location has limited GSM coverage and data needs to be sometimes downloaded manually. These fixed continuous air monitoring station release the Environment Team from having to physically do the monitoring, and provide more robust data. The STP operators should be provided with the monitoring data (this could be electronic and as a graph on the notice board) to enable them to track and be better aware of their performance.

The monitoring undertaken by GAC's Environment Team responds well to the potential impact areas from the current operations. As the Project is now starting to open up new mining areas and impact new communities and environmental receptors, GAC's Environment Team should develop a schedule for expanding the monitoring ahead of any significant earthworks so that baseline conditions can be established and dialogue started with potentially affected people so as to address and mitigate perceived impacts.

Health and Safety

In January 2023, GAC completed the move from SAP to VelocityEHS to manage its H&S system to GAC as well as DTP and GPC who operate a simplified version. It will enable the allocation of individual KPIs and inspection requirements etc., and better tracking of actions and issues. The move from SAP will include the transfer over of all the 2022 data and actions into VelocityEHS.

Health and safety is considered to be well managed at GAC and is a focus of continuous improvement. GAC commissioned a third-party audit of its occupational health and Safety (OHS) systems in October 2022, the outcomes of which were recommendations for improvements. GAC is targeting ISO45001 certification in 2023.

There continues to be a plan to have safety leaders attain NEBOSH certification, GAC now has trained incident investigators after leaders undertook ICAM (Incident Cause Assessment Method) training, and all supervisors completed 5-Whys (root cause) training. This staff development has the long-term view of the HSE Manager departing in 2025.

Overall management of OHS at GAC and its main contractors is considered to be good. During the monitoring visit there was very good compliance with PPE and use of safety equipment such as harness for working at height. GAC is looking to improve training through sending mid to senior level leaders for training at EGA, also by DTP sending management to look at the performance at other mines.

The IESC identified some areas where OHS risks were identified, including within the water treatment plant at the Pioneer camp where there are series of issues which provide potentially significant risks to the operators, and actions have been raised to addresses these.

GAC's fleet management team and their system track all vehicles live and if the vehicles exceeded 80 km/hour for more than a minute than an alarm was triggered in the vehicle at it was logged by central control. GAC stated that its journey management procedure avoided driving a night. Drivers must submit a travel request for journeys between Kamsar, Tinguilinta of Conakry. Any night driving would need to be a special mission. To reduce the driving on the public roads GAC has designated driving days (Monday, Wednesday, Friday) which allows it to combine people and reduce the number of vehicles.

During the IESC/Lender transfers between Conakry and Kamsar and Kamsar and Tinguilinta, the minibus followed a light vehicle of the gendarmerie. The IESC noted that while following the 80 km/hour speed limit, the vehicle did not follow the reduced speed limit signs in the communities (such as Boke). Also there was a tendency for vehicles to drive too closely together such that if there had been an emergency the second vehicle would most likely have not had time to respond and crashed into the light vehicle. Upon the IESC's request this driving distance was increased. The IESC recommend that GAC review both these issues and ensure that for any vehicles they respect the local speed limits in urban areas, and when in convoy adapt the driving distances to match the speed and stopping distances.

GAC's lost time incident (LTI) rate (which includes subcontractors) as presented in the February monthly report is zero. GAC's Total Recordable Incident Frequency Rate (TRIFR) is 1.54. There was one recordable injury (restricted work case) in January, and a further incident in March was reported to the IESC by DTP and the first report provided in relation to a mechanic who suffered hand burns from hot hydraulic oils.

Biodiversity

A status update on GAC's compliance with Lender requirements following this site visit:

- ✓ One PS6 relevant non-compliance has been closed – the Bridge 5 tidal flow obstruction has been remedied;
- ✓ There are four new PS6-relevant areas of non-compliance: biodiversity staff capacity and resources, effective weed management and control, and the need to understand the gaps in biodiversity monitoring implementation and what the consequences might be of these gaps. Plus, related to PS3 and PS6 at Kamsar, Bridge 5 reconstruction has resulted in channel bank erosion, increasing the sediment load into mangrove Critical Habitat;
- ✓ In total, there are now 13 areas of Lender requirement non-compliance related to biodiversity and natural resource issues – 10 high priority, 3 medium priority. Five relate to outstanding non-compliance items identified during the Due Diligence phase.

Where relevant, non-compliance reference numbers are flagged in text, and detailed further in the Issues Table, Section 3.

Biodiversity Team staffing, resources and resilience:

For biodiversity and natural resource capability/capacity within the Environment Team, see detail in Section 7.2.2. To summarise, the Biodiversity Team still lacks a senior Biodiversity Specialist, following the previous incumbent's contract not being renewed in early 2022. External consultancy Okapi were brought in for a 12-month contract in Nov 2022 to support and mentor the Biodiversity Team. Following the March site visit, the IESC were informed that GAC were curtailing their contract early (with a one-month notice). As GAC is operating in an area of Critical Habitat, their ability to implement the required biodiversity management program is primarily dependent on having sufficient capacity, capability, and resilience within the Biodiversity Team and to manage/interpret the work of specialist external contractors.

Although specialising in flora/reinstatement, the GAC core team still appears to lack (or does not have the time to utilise) skills and capacity in understanding and reducing impacts on priority terrestrial & freshwater fauna, spatial/temporal data analyses to inform effective adaptive management, an understanding of marine/coastal ecology and impacts, and use of GIS. In addition, further resources in project management & planning, data-entry personnel and review of the extensive camera trap footage collected would benefit the work program. Ongoing training and skills development is critical for addressing low team motivation, especially during times of repeated senior management change, team structure upheaval and personnel disruption as has been the case.

In the IESC's opinion, based on the last few years and the steady increase in the number of non-compliances, the current Biodiversity Team needs significant help to be able to run its biodiversity program in a manner compliant with Lender standards. With the imminent departure of GAC's external contractor, GAC immediately requires the support of specialists knowledgeable in both strategic and technical aspects of the work program. In addition, senior management require an enhanced understanding of what is required to manage a Lender-compliant biodiversity program in an area of Critical and Natural Habitat with high in-migration and land-use pressures. New non-compliance M10.7.

Biodiversity Management Program (BMP) implementation:

Okapi have made early progress in a number of their allocated tasks across the biodiversity program. They provided a progress-status spreadsheet noting % completion of various tasks. The IESC did not receive a detailed update on the implementation of BMP general and species-specific mitigation measures, and GAC are still not systematically tracking their biodiversity program implementation, its performance or implementing adaptive management. Again, GAC might want to revisit some of their biodiversity KPIs to enable more effective performance tracking.

GAC advise there have been no incidents where Environmental Buffer Zones, Critical Habitat or priority species were directly affected since our last review. At the mine site, the land disturbance process appears to be working well, with one current exception: appraisal drilling work at new Plateaus 7 and 15 in the north of the concession. It appears the Temporary Land Disturbance process was initiated prior to the work starting, and both the Communities and Environmental Team signed off – but the process is meant to trigger the Land Disturbance Procedure so that baseline pre-clearance assessments/surveys would be undertaken, but these have not occurred. Therefore, operations are continuing in areas newly opened up to vehicle access where chimpanzees have been regularly heard, with no assessment of impact or control measures developed – non-compliance M9.5 is retained.

Kamsar's Bridge 5 reconstruction is complete (see image on report cover) and the full range of seawater tidal flow is restored into/from mangrove Critical Habitat (CH). However, now there is channel bank instability either side of the bridge which has caused obvious bank erosion to occur, potentially causing episodes of increased sedimentation to flow into the mangroves. The banks on either side of the bridge require engineering work prior to the June rainy season to bring these back to an angle of repose and provide additional stability to avoid further erosion – new non-compliance M10.4. The construction footprint should then be revegetated.

No further mine-site plateau revegetation planting has occurred since the last visit due to the dry season. Observed rehabilitation at Plateau 26 appears to be regenerating well, no doubt enabled by sound topsoil storage then prompt reinstatement/re-placement post-mining plus active revegetation. The Biodiversity Team is managing this process this well.

Regarding the identification of wildlife corridors at the mine site, no update was provided on studies contributing to their identification, or analyses to understand where they should best be preserved. No update was available on future road planning to minimise fragmentation. The need to account for wildlife corridors was flagged with the Mining Team whilst on site.

Control of weeds at the Kamsar platform is an ongoing challenge, and Para-Technicians are working hard to stay on top of the issue: additional personnel have been requested for deployment at site to work prior to the rains. The focus for invasive species management at the mine site is in the Tiouladjiwol valley mise en defens - *Chromolaena odorata* has become a particular issue, especially as it was not originally noted in the baseline. GAC needs to ensure weed management and control is undertaken across the concession in GAC's area of impact, not just in the mise en defens e.g. for example, weeds observed in the newly accessed Plateau 7 where appraisal drilling is occurring. Also, a review is required on the movement of contractor vehicles as they are moving from within demarcated 'clean lines', then traversing known weed zones prior to then entering areas e.g. *Chromolaena* observed on newly cleared tracks on Plateau 7. New non-compliance M10.8.

On cumulative impacts, the IESC commend the collaboration recently formalised between GAC and Compagnie des Bauxites de Guinée (CBG) to work jointly on several aspects of biodiversity management, such as harmonising monitoring protocols (terrestrial and marine), mapping land use change, and integrated management planning at the landscape scale.

Biodiversity monitoring and evaluation program (BMEP) implementation:

A useful draft framework and schedule of forthcoming monitoring activities was provided following the visit, as there are still gaps in full BMEP implementation. A full review of monitoring program/analysis gaps is warranted, to focus action on remaining gaps and understand the consequences of not having complete datasets, especially when related to Critical Habitat qualifying species – new non-compliance M10.9. There is useful information being gathered from monitoring to date, but little analysis is undertaken; therefore, there are significant risks that GAC does not fully understand how well direct and indirect impacts are being managed and the resulting effects on priority species. A Lender-funded project operating in Critical/Natural habitat cannot assume that measurable adverse impacts are being avoided – this should be demonstrated (non-compliance M8.9 is retained)

Benthic habitat monitoring has still not commenced. No information was made available regarding the research commitments on Atlantic Humpbacked Dolphin, the West African Manatee and priority turtle species ('additional conservation actions' for CH-qualifying and high conservation concern species); this program of support appeared to have stalled in 2021. Para-Technicians continue to collate data on priority marine species landings at the Kamsar fish market, but no analysis of findings was provided.

Monitoring of freshwater fish and macroinvertebrates has been undertaken for wet and dry seasons at a number of locations across the mine concession by GAC's external contractor. Two eDNA sampling surveys have also been conducted. Neither GAC nor Okapi presented results from SAMEC's recent freshwater ecology or herpetofauna studies, the significance of findings or an analysis/interpretation of what the results might mean in terms of adaptive management in GAC's operations. For amphibians and reptiles, GAC's survey contractors have noted that degradation from deforestation (land use change, charcoal exploitation, etc) and increased mining activities seen across the landscape are contributing factors to the reduced diversity of species observed, especially when compared to earlier records. GAC's reservoir ecology has never been sampled, either by traditional monitoring techniques or using eDNA; the IESC recommend the ecological characteristics of the reservoir be better understood, as this is a GAC-constructed feature in an area of potentially CH-qualifying freshwater fish species.

External technical consultants are due to train the Biodiversity Team in aspects of chimpanzee monitoring so that GAC's monitoring procedures can be fully implemented. The outstanding requirement for genetic analysis of chimpanzee faecal samples remains outstanding – non-compliance M9.4 is retained. The IESC commends GAC's collaboration with peers in the neighbouring concession CBG to use comparable monitoring tools and methodologies across both concessions e.g. landscape-wide deployment of camera traps at the same time.

Residual impacts, metrics, offsets, and onsite set-asides:

Okapi provided a high-level progress-tracking spreadsheet and whilst at site presented a status update on development of the Biodiversity Action Plan (BAP), a key Lender deliverable. Okapi has been tracking progress in achieving a Lender-compliant BAP by measuring 0% to 100% progress in completing individual BAP document chapters – these chapters were not shared. The presentation was very high level and did not present technical aspects on how biodiversity losses and gains will be tracked and used to achieve No Net Loss/Net Gain (NNL/NG). The discussion indicated there was still much to be considered with regard to strategic thinking on GAC's NNL and NG technical rationale, how this translates into on-the-ground activities, the development of metrics and targets, how to fill information gaps, effective engagement and input from stakeholders, etc, before a draft BAP would meet Lender requirements. Discussions highlighted the need for innovative, scientifically robust thinking – non-compliance M7.1 is retained.

GAC previously contracted a different external consultant to use satellite imagery to undertake a land use change assessment from new versus baseline data; this assessment has still not been shared. The consultant supported GAC to develop a methodology to apply Quality Habitat Hectare (QH) to assess current habitat condition across both the mine and port sites. During this trip, GAC advised they had obtained updated satellite imagery to perform an updated land use change assessment, to inform an updated residual impact assessment for purposes of understanding NNL/NG requirements. The outcomes from a land use change assessment, the QH condition assessment, a description of how GAC intend to demonstrate NNL/NG, and the development of appropriate metrics, etc all need to be detailed within the BAP, and hence all contribute towards ongoing non-compliance item M7.1.

Given the strategic importance of the BAP, and the turmoil in external contractor engagement, GAC should immediately deliver a plan to Lenders on how an appropriate draft BAP will be delivered in the short-term, for Lender/IESC review.

As flagged previously, with appraisal activities now taking place in the northern half of the concession, GAC will also need to update the scope of the BAP, reassess their biodiversity loss (and gain) calculations to take impacts in the north into account, in addition to updating a full residual impact assessment – no update was provided during the site visit on GAC's intentions to represent and reflect impacts in the north .

For the Moyen Bafing Offset Program (MBOP), a collaboration between GAC and CBG on a joint biodiversity offset, an updated timeline was presented showing the process to formalise the appointment of a Park Operator and associated activities to support this. A status update was provided on activities and performance of MBOP's current implementation partner, Wild Chimpanzee Foundation (WCF) as they continue to work on a number of activities in the park related to conservation and community programs. Notable is the successful protection rate of high conservation forest areas from wildfire, and the survival rates at natural regeneration sites, both as a result of working closely with community groups. Financial matters have been one of the priority focus areas for the new MBOP Director since his recruitment in Q3 2022; MBOP partners now have a greater understanding of their financial expenditures to date and are actively exploring long-term funding avenues. The MBOP team advise a Biodiversity Offset Management Plan, guiding MBOP strategy and activities for the offset program, is due to be available later this year – in the interim, the non-conformance M7.2 is retained. Additional detail will be provided during RINA's final contracted MBOP review later in 2023.

For the mangrove Critical Habitat offset, since Kamsar platform construction commenced in 2015, GAC have tried various small area pilot projects to compensate for the approx. 68 ha loss of functioning mangrove habitat incurred. Previous attempts have tended to focus on mangrove propagule planting at both Taïgbé and Taïdy in the Kamsar sub-prefecture, but each planting has failed. Okapi was tasked with transforming the offset program into one that would meet Lender standards. Okapi studied potential sites at each of the two former locations, plus the Rio Kapatchez Ramsar site as previously recommended by IESC and ERM's initial feasibility study. In the IESC's opinion, based on GAC's experience to date, the scale and approach which Okapi is proposing for GAC's offset will likely be insufficient to deliver NG and a suitable mangrove offset to meet Lender requirements. The original 68 ha needs to be reassessed; multipliers considered for time-lag between loss of functioning habitat and its restoration; external pressures at Taïgbé are already too great to give assurance of offset outcome success; use of abandoned rice paddies needs additional study before being adopted; and GAC requires specialist offset and specialist mangrove restoration support. There is the need for international biodiversity offset design/management expertise, working alongside national/regional experts, to appropriately design, plan, and implement their offset program and establish a monitoring regime to demonstrate biodiversity gain over the long-term. GAC would benefit from their mangrove restoration program being run by an NGO or organisation that is well-experienced in effective mangrove restoration programs. Only then will GAC be able to start demonstrating how NG could be achieved and maintained for the duration of residual impact – the non-compliance M3.10 is retained.

Legally protected and internationally recognised areas:

GAC have now agreed with CBG to collaborate on delineating the Boulléré Key Biodiversity Area (KBA) boundary, and to seek its legal registration. Both GAC and CBG have received training on KBA identification, thresholds and boundary delimitation. Non-compliance M5.5 is retained until such time that a suitable onsite set-aside proposal and management plan is agreed with Lenders. The related recommendation is also retained to avoid any further degradation within the Boulléré boundary.

Management of Ecosystem Services / Community-based Natural Resource Management (CBNRM):

Dialogue with GAC over the last few years has focussed on efforts to establish a Community Based Natural Resource Management (CBNRM) program and to work at the landscape level to prevent the widespread conversion of natural habitats to cultivation. However, for compliance with PS6 paras 24/25, it is important that GAC manage impacts on all priority ecosystem services potentially impacted across the concession. For this visit, no update was available from GAC or Okapi on implementation of mitigation measures related to ecosystem services per se. The IESC recommend GAC review their implementation of the original ESIA mitigation measures related to ecosystem services, plus the 2017 additional mitigation measures from the gap analysis, to ensure that all mitigation measures are effectively avoiding or minimising impacts as predicted, and that these are monitored in a way that informs GAC's approach – the non-compliance M9.3 is retained.

In 2020, GAC committed to contract a consultant to undertake a landscape level assessment, to help develop a program for:

- a. conducting a landscape assessment identifying and mapping biodiversity priority areas / objectives and community land use / livelihoods / ecosystem needs.
- b. build CBNRM-related community capacity, and
- c. improve effective communication with communities tying in post-mining rehabilitation/restoration of land (i.e. the value of retaining ecological value when rehabilitating, not just resorting to widespread cashew nut plantations).

No update was available on recruitment of this consultant – non-compliance M9.3 is retained. Widespread land use change is obvious across the concession, and the urgency of wider landscape planning is becoming more pronounced. The IESC acknowledge this is community-derived land use change but is driven by the desire for compensation associated with the expanding footprint of mining. With no planned and managed intervention, there will continue to be widespread loss of habitat condition and is a GAC indirect impact. The IESC looks forward to learning more about collaborations with CBG at the landscape level, as noted above.

GAC continue to align a pilot CBNRM program with a pilot set-aside program in the Thiouladjiwol Valley, with the aim to protect the headwater and surrounding forest. In the catchment. The delays to the program noted in the last report have continued, and program implementation at Mobhi has still not properly commenced. The IESC/Lenders visited Mobhi again this trip, and although they are still keen to participate, their frustration is palpable. Apparently, the communities have been told to not use certain natural resources but have stopped using all natural resources as they did not want to affect their compensation rights and participation in the program. The villagers have lodged a grievance with their local district government office over the program delays, and there have been accusations about some GAC staff. The IESC recommends the recruitment or allocation of an experienced project manager who understands both biodiversity and community aspects and challenges. GAC's previous CBNRM contractor recommended the setting of natural resource management goals, identifying tasks to achieve those goals, working with the community to allocate different land uses and zoning, building eco-development projects, building alternatives to the use of natural resources where necessary – GAC would do well to reconsider this previous work to deploy the approach across areas where natural resources are under threat on the concession.

Labour Management

As of March 2023, the project had 3,224 workers including direct employees and the contractors' workforce, approximately 45 less than in November 2022. The number of GAC direct employees remains stable at 435 (compared with 432 in November 2022). The number of expatriates is 61, 12 less than in May 2022, while Guinean nationals remain increased 374, 11 more than a year ago, showing progress in the Guineanisation process. The percentage of Guinean nationals in the contractors' workforce has also increased from 95% in 2020 to 97% in March 2023. All employees in the departments of Community Relations, Information Technology and Government Relations are Guineans. Among the positions where Guineans have been identified and are being trained to substitute expatriates are Financial Controller, Environment Manager and Mine Director.

The number of workers from the region where GAC operates (Sangaredi, Tenene, Kamsar and Boké) has also continue to increase from 2,383 in 2020 to 2,441 in November 2022 and 2,668 in March 2023. The number of workers from affected communities went from 484 a year ago to 491 in November 2022 and 573 in March 2023.

Concrete actions aligned with the Diversity and Inclusion Policy include increasing of the maternity leave period, facilitating nursing for new mothers, minimising night shifts to address security and other concerns associated with working during the night, and improvement of recruitment and promotion of women. After a negative trend on women participation in the workforce during 2020 and 2021, the total number of female direct employees slight increase by 3 during the last review period to 41, and the number of women working for contractors has remained at 188 since November 2022. The percentage of female participation remains at 9% for direct employees and 6% for contractor workers. Although the improvements on the amount of women participation in the workforce is modest, there is some evidence that the implementation of initiatives targeting gender equality are rendering positive results in the last review period. To strengthen their efforts, GAC is encouraged to carry out career development sessions with male and female workers separately to understand specific goals and needs, and review health and safety training procedures with a gender lens.

GAC continues to implement programmes and projects to improve working conditions based on the information gathered during the second half of 2022 through a survey of all direct and contractor workers to identify issues related to discrimination and harassment, and a campaign to disseminate and improve the grievance mechanism.

It was previously reported that Laguipres, with over 500 workers providing security services to GAC, had not allowed their workers to form a union. After talks with GAC, Laguipres have stated that they will allow their workers to unionise; however, the company is not providing the support required by law, effectively blocking the workers efforts form a union. GAC continues to engage with Laguipres to encourage management to provide the necessary support. Freedom of association is a core principle of the ILO and IFC PS2. GAC need to ensure that all its contractors respect the right of workers to organise and form a union. If Laguipres do not respect the principle of freedom of association of its workers, GAC should replace them with firms that comply with all GAC's labour policies, Guinea legislation and the Lenders requirements.

As of March 2023, a total of 123 grievances had been received and recorded through a new system developed by the department of compliance. Each grievance is directed to the relevant GAC department or contractor. As contractors have their own grievance mechanism, they are not required to report on the status of the grievances, however, GAC will use the information gathered through the new system to strengthen the audits of the contractors' grievance mechanism in a bi-annual basis. GAC developed and disseminated among direct and contractors' workers an Anti-Retaliation Policy. The elevated number of grievances recorded suggest that through awareness and education as well as by addressing grievances transparently, workers have increased their trust on the grievance mechanism.

GAC has developed and is implementing a labour audit plan which indicates when each contractor will be audited (semi-annual or quarterly depending on the results of a risk assessment). In average HC plans to conduct five audits each month during 2023. In addition to the general labour audits, grievance mechanisms of contractors will be conducted semi-annually, including review of the status of grievances received by the general grievance mechanism.

The finalisation of the workers' housing strategy has been pending for several years. Finalising, communicating, and implementing the strategy will help improve labour climate and workers retention. GAC are encouraged to prioritise this initiative.

Social Management

With the commitment of management to improve social conditions in the area of influence of their operations, the social team (community relations and social investment) continue to be strengthened. Currently the CR department is organized in five areas: Land Acquisition and Compensation, Resettlement, Grievance Management, Livelihood, Migration Influx and Compliance and Stakeholder Engagement with a total of 15 staff positions (two vacant) 16 contracted positions. In addition, the Corporate Social Responsibility area has two staff positions under the director of the department to manage social investment.

GAC has implemented a tool to help focus stakeholder engagement and social management activities in priority areas. Each community within the area of influence is classified based on the type and level of impacts caused by the project, designated a zone, and mapped to facilitate and guide planning with a regional approach.

Stakeholder Engagement:

From November to March GAC had 279 interactions with stakeholders, slightly increasing the monthly average compared to the previous period (56 vs 51 monthly interactions). The leading topics addressed during community interactions were land access, and compensation, as the previous period, followed by health, safety and social behaviour, influx, and resettlement. With resettlement activities being finalised, the number of interactions related to this topic are less frequent.

GAC have installed bulletin boards in communities in the concession and port areas as an additional channel to keep communities informed; however, they need to be updated more frequently as some outdated information was noticed during the site visit in Filima. GAC should implement a procedure to review the content of the community bulletin boards weekly, updating the information provided accordingly.

The CR team has developed a strategy that provides a framework for mainstreaming gender aspects to enhance sustainability, create equal opportunities and improve access to project benefits by men and women, ensuring that women are not disproportionately affected negatively by the project and to promote their development. To monitor the effects of the project with a gender lens, GAC maintains disaggregated statistics for the participation of community members in the different programs. Women are still underrepresented in most stakeholder engagement and consultation activities with only 8% participation (slightly higher than the 7% participation in the previous period). Similarly, male participation is considerable higher in the local employment program with 90% of local employment going to men and the graduation and rail safety programs with approximately 70% participation of men. The only program that has reached gender parity is the livelihood restoration program. GAC continues to work towards gender equality in community consultation and participation, however, the current structure of the CR team, with only one woman in the team of 13 staff and no female community relay may not be conducive to facilitate the

participation of women from the communities. As the CR team is strengthened, GAC have reserved one position to be filled by a woman. GAC should consider prioritising hiring women for all new positions and for any position available through turnover in the future, including community relays, to promote the participation of women in consultation activities and in other social management and development programs.

Grievances and Conflict Management:

The community grievance mechanism continues to be implemented with positive results. During Q1 2023, 50 grievances were received, a higher number than in average periods, which is seen as positive, providing the CR team with an opportunity to engage with stakeholders and to address issues that otherwise may become the source of conflict. Only one community blockage of GAC's operations was registered during the period, the lowest number since the start of operations. At the time of the site visit, 30 grievances had been resolved in an average of 13 days.

Some inconsistency and erroneous classification and description of grievances were identified during the site visit. These misclassifications did not affect the resolution of the grievances but could have compromise the prioritisation or development of solutions to systemic issues. GAC should review the way grievances are recorded and described in the system to increase clarity and avoid confusion.

Social Investment:

GAC's Community Investment Strategy (CIS) is organised around three programs: (a) Contributions to FODEL, (b) a five-year (2019-2024) Social Investment Agreement with the IFC (IFCSIA), and (c) a discretionary component of GAC initiated projects. As per Guinean legislation, GAC made the third annual contributions of 0.5% of revenues to the Local Economic Development Fund (*Fonds de Développement Economique Local – FODEL*) in April 2022. The fourth contribution is scheduled to be done in May 2023; however, no funds have been used or will likely be used until the government releases the funds after the next elections now scheduled for towards the end of 2023.

In Q3 2022, GAC conducted an internal review of their social investment initiatives. Based on the review, GAC identified three priorities for social investment: 1) ensure successful completion of ongoing initiatives on time and on budget, 2) develop and implement a signature CSR strategy, 3) continue to support women's development. Under the first priority, GAC continues to support six of the seven initiatives active in since 2022: fish smoking, market gardening, fruit production, mechanical training, sewing, and soap production. The community nurseries project has been completed and is considered a successful and sustainable initiatives benefiting three communities, which are producing local species of trees for mine rehabilitation. Between the seven initiatives over 500 people (close to 80% women) in 26 communities have been benefited. The signature CSR strategy will be developed with the support of a Canadian NGO. Regarding the support for women development, GAC have supported the development of a digital house in Béli Kindy, provided emergency support to an orphanage in Tanene and conducted a campaign against early marriage of girls in six villages.

Community Health and Safety:

GAC keep a risk register updated regularly. Among the community health and safety risks GAC have identified road accidents, increased rail traffic, interaction with mine activities, emergency situations such as fires or dam failure, blasting, loss of access to resources, dust, vibration, blasting, red mud, in-migration and communicative diseases. During the first quarter of 2023, communities were classified by level of risk and mapped to facilitate both stakeholder engagement and health and safety risk management.

GAC continue to implement the traffic and vehicle management plan and provides road and rail safety training to communities in the concession area and along the corridor between the mine and the port, including a campaign on rail safety in nine villages along the railway. GAC has also initiated the construction of fences along the railway in the concession area near the processing facility to help prevent accidents.

Other procedures and activities that GAC continues to implement to manage health and safety risks to the communities include a blasting procedure, informing communities of time and place in advance of each blasting, watering roads to mitigate dust, drainage control to prevent red mud and flooding and sensitisation of maritime safety for artisanal fishers and other users of the canal at Rio Nunez. In relation to the efforts to minimise safety risks and other impacts to fishers, GAC contracted a consultant specialised in fishing impact studies to conduct study of the use the of GAC's trans-shipment area, and the Rio Nunez strait in general, by artisanal fishers. The draft study was submitted to GAC in March 2023 and once finalised will be used by the company implement mitigation measures in its operations and to coordinate efforts with other users of other users and the port authority to manage impacts to fishers.

The CR team in collaboration with the Biodiversity team have been focusing the Community Based Natural Resource Management (CBNRM) programme on the implementation of a pilot project in the Thiouladjiwol valley. Although the proposed projects are expected to benefit community members from a production and economic development perspective, from a biodiversity perspective there has been no analysis of the effects that these projects will have in terms of conservation of the area and protection of ecosystem services. GAC should consider promoting the exchange of knowledge and experiences between their internal Biodiversity and CR teams and the MBOP team.

Influx Management:

GAC have in place an action plan for the implement its Project Induced Implementation Strategy (PIIMS) in 2023 focusing on monitoring of in-migration to their areas of operation and capacity development of local authorities and villages to manage migratory influx. Through consultation with stakeholders in three areas (Sangéredi, Tanene and Kamsar, additional measures to mitigate negative impacts and to increase potential benefits were identified. GAC is working with other mining companies in the area to create a regional influx management network. The PIIMS was developed with a 5-year horizon that concludes at the end of this calendar year. A new strategy should be developed based on the experience and information gathered and the new regional context.

Security:

The security situation continues to be rated as medium with no significant changes that affect security risk to GAC operations or the local communities, therefore GAC's security arrangements have not been modified. During the first trimester of 2023 there were no security incidents and the only blockage of GAC's operations was carried out and quickly resolved without intervention of security forces. In the build up to the forthcoming elections in 2024 GAC anticipated that there was a risk of an increase in local protests and potential road blockages which had the potential to temporarily impact the project operations, but none were expected to be focused specifically on GAC. Security Risk Assessments (SRA) are conducted regularly, in accordance with the SMP. Considering that the security situation and social context have not deteriorated or significantly changed, it was determined that the SMP does not need to be updated. The labour issues regarding freedom of association of security guards (see labour section) need to be closely monitored by the security manager as it can represent a considerable risk to GAC's security operations.

Land Acquisition, Compensation and Resettlement:

GAC have in place a Land Acquisition Compensation and Resettlement Framework (LACRF) that outlines the principles for providing compensation and resettlement and livelihood restoration support to affected people and communities. Through a recent update to the LACRF, GAC have developed procedures to reduce impacts on high value agricultural land and to minimize the risk of displacing people more than once. This last procedure considers potential impacts of GAC on replacement land as well as from other mines operating contiguous concessions. Given the increasing scarcity of land in the area, under certain circumstances the updated LACRF allows for the providing alternative livelihood restoration options in-lieu of replacement land. Another new procedure integrated in the LACRF addresses the need to extend the footprint of mining pits on short notice through an accelerated land acquisition procedure for small extensions of land. The IESC and the lenders have requested GAC to do minor adjustments to the proposed changes to the LACRF, including defining clear criteria to apply the accelerated land acquisition procedure, as opposed to the development of a full Resettlement Action Plan (RAP).

As part of the CBNRM set-aside program in the Thiouladjiwol Valley, GAC has requested communities with land use rights in the area to refrain using natural resources in the valley since 2020. GAC has compensated the communities for loss income from their agricultural land within the valley, however, no compensation has been provided for the loss of access to natural resources, such as collection of firewood, hunting and collection of fruits and other resources. GAC needs incorporate in the LACRF a procedure to compensate for loss of access to resource. GAC needs to compensate affected communities in the Thiouladjiwol valley considering impacts during the last two years and until the alternative livelihood restoration projects are fully implemented. Once the LACRF and all procedures are approved, they need to be incorporated in the SMS.

GAC continues to implement RAPs for three physically displaced communities. Most resettlement commitments have been completed, including the recent repair of construction defects of resettlement housing and water distribution systems in Filima and Béli Kindy. Residents of Filima have expressed their concerns with the inadequacy of the latrines in the resettlement site. Although the issue is due to an increase of the population of the community to close to three times since the resettlement took place 4 years ago, exceeding its design and GAC's obligations, GAC is encouraged to support the community to build capacity to manage population growth and infrastructure requirements.

In Sinthiourou Thiouladji, all housing and community infrastructure has also been completed, with the exception of the access road, which is currently under construction with 75% progress with expected completion in 2023.

To ensure all resettled households have security of tenure of their new residences, three notaries hired by GAC continue supporting PAPs of the three communities with the registration of properties. Progress on land titling is estimated at 80%.

Through the implementation of Livelihood Restoration Plans for economically displaced by the conveyor belt in the port area, the dam and water pipeline in the north of the concession, and mining activities in Plateaus 20, 26 and 31, and those physically displaced in from Dapress, Béli Kindy and Sinthiourou Thiouladji, close to 6,000 have been benefited. GAC has completed an external review of its livelihood restoration programs assessing effectiveness to restore livelihoods, sustainability over time and contribution to gender equality. GAC will develop an action plan to implement recommendations mostly to improve sustainability, which was the main challenge identified in most projects.

In 2020 GAC reached an agreement with displaced artisans from Dapress to build an artisan centre in Filima. After considerable delays, the construction of the first phase of the artisan centre started in October 2022. The site was visited by the IESC in November 2022 and again in March 2023 witnessing minimal progress. This non-compliance will remain open until the centre has been completed and the artisan have been relocated. Support has been provided to some artisans for the development of an EIG. GAC needs to ensure all displaced artisans interested in forming an EIG receive similar support.

Of a total of 421 PAPs that have lost agricultural land, 405 have found replacement land of which 398 have been fully compensated as they have completed the land preparation (15 during the period). Of the remaining 16 PAPs 11 have yet to find replacement land and five have not been compensated due to relocation outside of the area.

GAC engage external consultant to audit the implementation of the RAPs annually. In addition, GAC are required to undertaking a completion audit of the RAPs once all mitigation measures have been substantially completed and displaced persons are deemed to have been provided adequate opportunity to sustainably restore their livelihoods and living conditions. GAC have engaged external consultants to undertake the completion audits of the Béli Kindy, Filima RAPs and the Dam and Pipeline LRP. The completion audits are expected to be conducted and finalised in Q2 2023.

Cultural Heritage:

GAC continue implementing the Cultural Heritage Management Plan including the Chance Find procedure and related training to workers. In the last review period, no new cultural heritage sites were identified.



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