



Plateau 20 Mining IESC Visit June2024

Guinea Alumina Corporation Conakry, Republic of Guinea

GAC PROJECT

IESC Monitoring Report: Twelfth Monitoring – Site Visit June 2024

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ABBREVIATIONS AND ACRONYMS

AfDB	African Development Bank
ARRC	Avoid-Reduce-Restore-Conservation Task Force (IUCN)
ASI	Aluminium Stewardship Initiative
BAP	Biodiversity Action Plan
BEN (or REB)	Bauxite Environmental Network
BMEP	Biodiversity Monitoring and Evaluation Plan
BMP	Biodiversity Management 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
CC&E	Community Engagement, CSR and Environment (CC&E Director)
CEMED	Multi-Consultancy on Environment and Development Expertise Firm (Cabinet d'Expertise Multi-Conseils et Environment et Development)
CEO	Chief Executive Officer
CFB	Chemin de Fer de Boké
CHA	Critical Habitat Assessment
CIS	Community Investment Strategy
CLO	Community Liaison Officer
CNTG	National Confederation of Workers of Guinea (Confédération Nationale des Travailleurs de Guinée)
COVID	Coronavirus Disease
CR	Community Relations
CSR	Corporate Social Responsibility
EBZ	Environmental Buffer Zone
EcoS	Ecosystem Services
EDC	Export Development Canada
EGA	Emirates Global Aluminium PJSC
EHS	Environmental, Health and Safety
EMP	Environmental Management Plans
EMS	Environmental Management System
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plans
ESMS	Environmental and Social Management System
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
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
ITP	Interim Technical Panel
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
LTI	Lost Time Injuries
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
MTI	Medical Treatment Injury
NGO	Non-Governmental Organisation
NG	Net Gain
NNL	No Net Loss
OHS	Occupational health and Safety
OS	Operational Safeguard
PAP	Project Affected People
PFS	Pre-Feasibility Study
PIIM	Project Induced In-Migration
PS	Performance Standard
RAP	Resettlement Action Plan
RfP	Request for Proposals
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
TRIFR	Total Injury Frequency Rate
USTG	Union of Workers of Guinea ' <i>Union Syndicale des Travailleurs de Guinée</i> '

WCF	Wild Chimpanzee Foundation
WHO	World Health Organization

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, and 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 21st June 2019 and is now fully operational with a focus on progressively improving Project efficiency and increasing exports. GAC exceeded its target in 2023 shipping 14.1 MT, this was achieved with an average of 22 trains/week. The plan is to increase this to 14.4 MT in 2024. Future targets are 18 MT in 2025 and 20 MT in 2026 which are dependent on the rail upgrades allowing more trains.

This report presents the IESC's findings of the Project status at the time of review of the 12th monitoring event post financial close. This audit closely followed the previous visit format, 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. This visit was slightly extended to allow more time for the community and biodiversity elements which added value to the visit outcomes. The site visit was undertaken between the 19th and 25th June 2024, with a wrap-up session on Wednesday 26th June before the lenders and IESC departing for Conakry. GAC provided data in advance of the site visit, with additional information requested after the site visit, with the documentation cut-off date the 16th July 2024, to provide the IESC more clarity or verify several discussion items. This monitoring visit therefore has considered operations from February to May 2024 as well as the current situation at the time of the visit.

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

Top management continue to have strong oversight of the SHEC team with the Community, CSR and Environment Director reporting to the CEO, and the Safety, and Security teams report to the COO, and Health reports to the CEO. Both the CEO and COO have a long history with the project and have specific SHEC responsibilities. The Community, CSR and Environment Director has now been in position six months and appears to be contributing to a more strategic direction and also the management of areas such as the Aluminium Stewardship Initiative (ASI).

The ESHS team remains largely the same as the last audit in January, with the exception of the departure of the Environment Manager in Q1. GAC reported that it had identified a new candidate who is expected to join in July 2024. Other vacancies in the team including the lack of a Biodiversity Consultant remain challenges which GAC is working to refill. Despite these changes, and through the support of an external consultant, the team has made progress defining roles and responsibilities and progressing with the planned move to use databases such as Borealis. In order to maintain and develop the team, recruitment into vacant positions needs to be completed (the team is circa 30% below capacity) and training provided to the various levels within the team as part of their personal development and progression in GAC.

The Safety Management team has remained consistent and to be delivering a strong programme. GAC is in the process of appointing a new Chief Medical Officer (CMO) who will be based at Kamsar and responsible for health across GAC's operations. In the absence of the CMO the chief paramedics at Tinguilinta and Kamsar are responsible for operations, medical staff, and clinics (including ambulances) at the Mine and the Platform/Port. This structure is well established and appears successful in managing the risks in these areas.

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).

For biodiversity and natural resource capability/capacity within the Environment Team, see detail in Section 7.2.2. In summary, the Biodiversity Team has not had a permanent senior Biodiversity Specialist since early 2022. Incumbents in the Superintendent and Supervisor roles have been in post for many years, and experienced support is also provided by the Moyen Bafing Technical Manager part-time allocated to the Team. Two new Marine Technicians are in place, and these will be made permanent when their short-term contracts expire. 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. The interim Environment Manager is reviewing skills and capacity as part of development of the PS6-relevant Corrective Action Plan. In the interim, the remit of TBC (The Biodiversity Consultancy) has now increased, and they are now providing targeted specialist support on a range of PS6-required program components.

The social management function is divided into two main areas: Community Relations and Corporate Social Responsibility (CSR), both reporting to the newly appointed Community, CSR and Environmental Director. The Community Relations Manager has five reporting lines: stakeholder engagement, resettlement, livelihood restoration and compensation, grievance management, and livelihood and influx management. The Community Relations function has a total of 14 direct positions and 27 people engaged through labour brokers and is in the process of adding an additional 5 community relays to complete a team of 13 in the mine area and 2 in the port. It is expected that once the 5 new positions are in place, the CR function will have sufficient resources for implement all social plans and programmes and to manage social aspects of GAC's operations effectively. However, it is still necessary to increase the number of female team members to strengthen gender inclusion in community relations and to support women participation in consultation activities. The Corporate Social Responsibility Manager is supported by one staff. The Influx Management and Livelihood Restoration team of the CR function is involved in the implementation of actions of both livelihood as impact mitigation and CSR programs, potentially creating confusion and unrealistic expectations amongst communities. Establishing a clear separation of the programs by adding a member to the CSR to implement programs in the ground could help close the RAPs and initiate a new type of relation with the resettled communities.

Management Systems

GAC's Environmental Management System (EMS) and Social Management System (SMS) procedures have been in the process of being updated for a number of visits. Within the OESMS there is reported to have been progress in developing key procedures such as the Land Clearance Procedure, blasting and dust management procedures, and monitoring procedure. Following the biodiversity workshops during this monitoring visit there is plans to update the Land Clearance Procedure. There is also work being done in the legal risks which is aimed at taking an integrated approach. Once the Environment Manager is place and other more critical areas have been addressed such as clearing the environmental non-compliance items in VelocityEHS and support to the biodiversity team, GAC's consultant will assist finalise OEMS documents. While these documents are in draft, they are being used and managing the risks and impacts from the existing operations.

The OESMS documentation is also understood to be a focus area for the ASI audit which is happening at the end of June 2024.

The 2015 ESIA Addendum scope was for mining in the southern part of the concession, and it is under these ESIA approval conditions the current mining is taking place. However, GAC has been undertaking ore-grade exploration drilling at Plateaus 7 and 15. It was not clear to the IESC that the original ESIA or Addendum was sufficient to cover GAC's new exploratory operations on these Plateaus. GAC have now reviewed the situation, noted that this is a breach of internal procedure, that insufficient baseline data was obtained, and that the ESIA and BAP (Biodiversity Action Plan) will be updated. Addendums are expected in Q3 2024.

While not directly related or part of the current IESC scope, as part of the review of the project, GAC is in the process of reviewing the ESIA and updates that would be required in respect of the expected refinery design, rail spur, road access (including a potential new road crossing of the Tinguilinta adjacent to the current water pipeline crossing near to Sinthiourou Thiouladji village). This review ties into the legal review of permitting of the current operation.

Environment

GAC is now implementing the changes to its environmental monitoring programme following the review of its operational environmental management strategy. This included refining and rationalising, undertaking the water, air, noise and vibration monitoring. Also improving its waste strategy and management, and the biodiversity programme management. While these changes were initiated following the review by the now departed Environment Manager, the changes appear to have progressed with the support of the external consultancy THOR, and are owned by the environment team.

A competency weakness which has been previously identified by the IESC is the approach to the QA/QC of data being collected by the team. While this is improving, there remains a need to focus on this in future training. The imminent move to use Borealis (the licences have been purchased and training is planned) and transfer of data management to that, should assist and be part of improvements in QA/QC and data management. Then there is a need to ensure that the data is used as needed to inform management decisions and drive continuous improvement.

Positively based on the environmental score card (in GAC's Q1 2024 Monitoring Report), observations from the site visit and discussions with the environment team, GAC environmental performance has continued to be good. There have been no regulatory notices or significant environmental releases. As of the end of May 2024 there had been 27 environmental incidents to date in 2024 (there were 48 in total in 2023), and these, as for the previous months, typically ranged from minor oil spills (the most frequent issue) to excessive blast noise or unauthorised land clearances. Discussions with GAC indicated that these areas are a focus for improvement, and it is noted that there were no significant incidents (excessive blast noise are registered even slightly over the limit).

Greenhouse Gas Emissions

GAC is continuing to track its performance against both the Bauxite Industry Benchmark and its performance in the same month of the preceding year. Over January to April GAC's energy intensity (Gj/Mt) and GHG intensity (kg CO₂-eq/Mt) were at or below the equivalent in the same months in 2023. GHG intensity was above the bauxite industry benchmark of 5.0 over this period (ranging from 5.4 to 6.1 kg CO₂-eq/Mt). It is suggested as part of GAC targeting of GHG reductions that an assessment of the range of GHG emissions in the industry is reviewed to assess where it is performing against industry peers in Guinea, if this data is available. This could provide GAC with more focus areas for GHG emissions reduction if the industry data is available.

The 2024 January to April monthly emissions averaged approximately 6,840 tCO_{2eq} compared to 6,450 tCO_{2eq} for the same period in 2023 (total Scope 1 GHG emissions for 2023 were calculated as 78,462 t CO_{2eq}). The continued trend of increasing absolute volumes of GHGs reflects the increasing exports, whilst the energy intensity continues to decrease indicating an increasingly efficient operation, despite the longer haul distances. It is not clear how the new larger trucks which are now part of DPT's fleet will influence the overall energy intensity and GHG intensity.

The GHG emissions associated with the fuel used by the CFB to transfer GAC's wagons between the mine and port are considered to be Scope 3 under IFC's guidance, and GAC calculate this to average 1,261 t CO_{2-eq}/per month for January-April 2024 (the average in 2023 was 809 t CO_{2-eq}/per month). Fundamental to this calculation is the average fuel consumption per train journey which is understood to be based on a value provided by CFG in 2019. The IESC consider that it is most likely that this value is out of date and therefore these Scope 3 value may be erroneously high or low. It is recommended that GAC check with CFG as to their estimate of the latest fuel use and then check again once the new running speeds are in place.

Water Use and Monitoring

The 12th IESC monitoring visit was at the start of the wet season, and there was overnight rain although the ephemeral rivers were not yet flowing outside of the storms. The period since the January visit had therefore been dry season. Over the period January to April the average water use had been circa 40,000 m³, which was slightly up from the same period in 2023 when the average was close to 39,000 m³. The average water intensity over these four months was 0.039 m³/t of ore exported which is slightly lower than 2023. Based on discussions with the GAC environment team and their consultant it is expected that the confidence in the water use value and therefore water intensity will improve and likely reduce. At Kamsar when water is present in the stormwater settlement pond, the water is abstracted of use for water suppression, and there are plans that once the STW is replaced and meeting performance requirements, the treated water will be collected and used also for dust suppression year around, instead of being discharged offsite. Overall water use appears to be in accordance with Good International Industry Practice (GIIP) and the move to recycling more will assist further improve the water intensity value, and at Kamsar reduce the need to use desalinated water for low value dust suppression.

GAC is procuring limnometric scales to enable water levels at the river monitoring points to be verified at any time (without the need to enter the river), and the flow rates calculated. These would also enable GAC to utilise local

community members to take the readings in the wet season when access from Tinguilinta is challenging. Once limnometric scales are in place and Borealis data entry is taking place GAC can focus on the QA/QC of the data and resolve any error in the flow assumptions.

Surface and groundwater quality monitoring is being undertaken and GAC is fulfilling its obligations, however the IESC has concerns over the quality of the monitoring and its interpretation. It is recommended that GAC review the approach to the QA/QC of the data it collects and the data provided by third party laboratories to ensure that it has a high confidence in the data collected, and then uses Borealis (when this starts to be used) to assess and monitor data trends to enable GAC identify changes in water which are occurring before they become critical.

Waste Management

There has been good progress with the waste management on the Project, with four new contracts being signed with waste companies and also the re-permitting of the incinerators at Tinguilinta and Kamsar to enable them to burn oily rags and contaminated cardboard, as well as being used for medical waste. The signing of the new contracts has already led to the removal of stockpiled tyres and oils. The restarting of the incinerators should also lead to GAC beginning to reduce the substantive stockpile of soiled cardboard, soiled paper and oily rags.

It is notable that the tracking and accounting for wastes has improved with the new spreadsheets developed with support from an external consultant. This makes the waste database searchable on waste type, producers, area, and disposal route etc., improving GAC ability to implement proper duty-of-care obligations. It also assists track waste volumes on site within the environment department's management areas and picks up details of waste generated and stored elsewhere on the Project (as is the case often with scrap metal). GAC has a programme to undertake audits of the waste contractors used every six months.

While not a direct environmental risk, there is a business risk for GAC in not having a system for measuring the weight of materials disposed of off-site; the current system relies on estimates of weight and the honesty of the contracted company to report the weight it receives. It is recommended that GAC install some system which will enable the weight of materials arriving at the waste management areas and, more importantly, exiting the area.

An overall observation is that waste contractor team are required to undertake a lot of sorting of mixed wastes. This poses an increased risk of injury for the workers (from sharp objects in the waste for example) and is time consuming (the impression is that this approach is not keeping up with the volume of materials arriving at the sorting area. It is recommended that GAC review this and implement area by area targeted training programmes to better sort waste at source.

Air Emissions

During the monitoring visit air emission from dust were minimal due to the start of the wet season. Therefore, there was no requirement to undertake dust suppression on the roads or operate the automatic dust suppression systems at the car dumper or the mine crusher. Dust around the operations at the tie of the monitoring visit was not considered to be an issue from the general operations and vehicle movements. There was also no update on the outcome of the tests of the use of an additive Cypher's DUST/BLOKR[®], which is reported to be non-corrosive and environmentally friendly, and if effective would result in a reduction in the required application of water and a reduction in dust emissions.

The dust monitoring (PM_{2.5} and PM₁₀) continued to undertake monthly at the 10 monitoring locations, six of which are village locations. The results showed compliance with the WHO limits for both parameters and also the inferred start of the rains in April lead to a marked reduction on dust levels across all locations.

Ambient air monitoring by GAC has included diffusion tubes monitoring for hydrogen fluoride, nitrogen dioxide, and sulphur dioxide which are placed at eight locations which are four are around the Kamsar platform, one at Tinguilinta camp, and at three in village locations (Béli Kindy, Tambagourou, chemin de Tambagourou, and Horewedou Misside). None of the monitoring points show elevated levels of these three gases.

Air monitoring of the power station generators at Kamsar and the generators at other locations on the Project indicated elevated levels of nitros oxides (NO_x) and also carbon monoxide (CO). The monitoring report states that NO_x levels are high but typical for that type of facility, and abatement measures can be considered if necessary to comply with regulations. To reduce NO_x and CO emissions from the various generators in the short term, the monitoring consultant considers that it is necessary to install after-treatment systems on exhaust ducts. In addition the use of diesel particulate filters, and diesel oxidation catalysts, can reduce NO_x and CO emissions. This will be an area of follow-up on the next monitoring visit.

Health and Safety

GAC continues to focus on building the safety culture within the business this has included training the Guinean managers from supervisor and above in 5 Whys incident investigation with 6-months of one-on-one coaching on H&S investigation. On the mine there is also one-on-one of the mine manager on safety by a Mine Safety Advisor. The use of VelocityEHS continues to function well and allowing the safety team to successfully track actions and issues. The challenge is that the superintendents don't have an incentive to close out issues and therefore these are accumulating (even if closed). GAC is working on this issue in its training and tracking of performance, this training will lead to better investigations and improved turnaround on these. There are also changes being implemented for VelocityEHS which automatically allocates the response time based on severity.

A key focus area has continued to be driver fatigue with DTP have 6 incidents in the last 12 months were truck crashes and roll-overs occurred with fortunately no injuries or significant damage. In March there was a significant focus with DTO into the root causes and this included evaluation of the impacts of Ramadan and home life. The investigation of home life pressures which had been agreed with the unions and labour brokers, revealed issues of people taking second jobs or not being able to get to bed early enough. Drivers needing these interventions were identified through the information from the Hexagon software.

Visits to both the Kamsar and Tinguilinta clinics were undertaken during the monitoring visit. No issues were identified, and it was noted positively that the coverage provided continues to improve including the installation of an X-ray system at Kamsar which was awaiting commissioning. There is also planning underway to centralise the main medical facilities to the mine area once the mining contract retendering is complete, this would consolidate the mine contractor's (currently DTP).and GAC's medical facilities at the location with the highest risks and reduce duplication and redundancy. A small clinic would be maintained at the Tinguilinta camp. Medical SOPs are being updated to reflect the new equipment and procedures which have been brought in.

GAC's Q1 2024 continues to be very good with no lost time injuries (LTI), and one medical treatment injury (MTI) (bees stings leading to an allergic reaction) . This MTI led to a Total Recordable Incident Frequency Rate (TRIFR) of 2.1, which is similar to 2023 for the same period, and well below GAC's target of 4.3. Incidents tended to be predominantly related to fatigue related traffic accidents (as discussed above).

Biodiversity

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

- ✓ There are two new PS6-relevant areas of non-compliance (incident response & Natural/Critical Habitat, and marine Additional Conservation Action studies), and one closed (land disturbance procedure not applied at Plateau 7 & 15);
- ✓ In total, there are 14 areas of non-compliance with Lender requirements related to biodiversity and natural resource issues – nine high priority, five medium priority. Five relate to outstanding non-compliance items identified during the Due Diligence phase.
- ✓ The IESC are encouraged by GAC's proposed approach to resolving these long-standing area of non-compliance through (a) the development of a Corrective Action Plan, (b) significant levels of support from external technical consultants, both hopefully to embed lender-compliant approaches into strategic program improvement. At the request of the CEO, a follow-up call with Lenders/IESC is planned within 1-2 months of the end of the site visit [note at the time of report finalisation (Sept), a call had not been scheduled].
- ✓ The IESC recommends GAC leadership (C-level/board/EGA) be fully briefed on IESC/Lender concerns over the significant gaps in biodiversity management performance at site, and the urgent need for measurable action by GAC.

Note: GAC proposes the development of a Corrective Action Plan, responding to a letter from Lenders in May 2024, building on their observations and previous IESC reports, ESAP items not yet closed and flagging long-term outstanding non-compliances. Due to the majority of visit time taken up with useful workshop discussions for the Corrective Action Plan and expectations going forward, very little time was available to receive updates on performance and activities since the last IESC visit. This precluded the usual structured discussions between the IESC, Lenders and the Biodiversity Team. PowerPoint updates were requested to be sent immediately following the visit, but many were not received. A draft version of the Corrective Action Plan was due to be circulated on the 10th July, but this was not shared. Therefore, the report text reflects information sourced through discussions and expectations building on previous knowledge, for input into Corrective Action Plan.

The IESC maintains that reporting on future intent rather than recent and current action is not typically considered appropriate or good practice for an IESC audit; special exemption was made for this visit given the seriousness of

cumulative concerns, and the opportunity of being at site with Lenders, GAC and IESC to discuss GAC's Corrective Action Plan. However, the IESC and Lenders will consider the Project non-compliant status as of high concern until evidence of delivery and implementation of these proposals are demonstrated.

Biodiversity Team staffing, resources and resilience:

The Biodiversity Team has continued without a permanent senior Biodiversity Specialist since early 2022, although GAC advise they are finalising contractual details for the recruitment of a replacement (not confirmed at the time of report finalisation in Sept). Other staffing is the same as the last report, apart from the addition of two Marine Technicians to be based permanently at Kamsar (currently short term-contract, but will be employed when these contracts expire).

As the Team embarks on this period of targeted transition to develop and implement the Corrective Action Plan, GAC management will be assessing the skills within the team to ensure sufficient capacity and skills alignment. The Team will need significant technical and managerial support over the next 12-24 months to get the work program on track and fully implemented. Core specialist support will be necessary for key Lender compliance activities such as BMP, BMEP and BAP update and implementation. TBC (The Biodiversity Consultancy) will continue to support GAC: their remit is expanding and they're currently providing specialist review and alignment with Lender requirements.

The non-compliance raised in March 2023 (M10.7) is retained until it becomes clearer that staffing resources are sufficient to achieve the required work program.

Biodiversity Management Program (BMP) implementation:

The BMP requires adherence to a number of General and Species-specific Control Measures (GCM and SCM). Recent performance against each GCM and SCM was not presented, and the situation remains that GAC are not systematically tracking their biodiversity program implementation, its performance or implementing adaptive management. The May 2022 non-compliance M8.9 is therefore retained.

TBC have undertaken a gap analysis of biodiversity of monitoring approaches, and a memo was provided for this visit summarising linkages and gaps amongst key documents. GAC advise that TBC will provide technical support in the review and revision of the BMP to ensure Lender compliance. Lenders agreed that the IESC should use this updated BMP for the purposes of assessing compliance for the Completions Certificate, assuming it is adequate and comprehensive. The Corrective Action Plan workshop reviewed these in detail, and it was agreed the majority of measures were still relevant, but many required revisions to best-reflect good practice and the objectives for impact avoidance and reduction. Choice of and use of KPIs and indicators will be key to understanding impact-mitigation performance and when adaptive management is required. The BMP will not only need to be updated to be fit-for-purpose, but GAC will need to demonstrate implementation of its requirements before the Certificate can be signed off.

No updated information was presented related to recent PS6-specific incidents. There was no information provided on whether any investigations had occurred into impacts on mangrove habitat related to the incident noted in the last IESC report of a missing vehicle wash-bay oil/water separator and the associated contaminated discharge. To be in compliance with PS6 Natural Habitat requirements, GAC needs to be able to demonstrate that no significant degradation has occurred and that any degradation is mitigated according to the mitigation hierarchy. There have now been a number of occasions where mangrove habitat could have been impacted at different locations around the Kamsar platform, but GAC has not followed up to identify the extent or significance of impact on mangrove habitat. A new non-compliance is noted (M12.6)

Regarding the exploratory drilling on Plateaus 7 & 15 that proceeded with due regard to the Land Disturbance Procedure, although requested, there were no updates on implementation of corrective actions and no updated procedure has been provided. The detailed memo provided following the January visit is sufficient to close the non-conformance M9.5, however, the IESC recommends that amendments are formalised in an updated Land Disturbance Procedure updated by the end of the year.

No updates were presented on revegetation and regeneration, although visually regrowth appears good. Surface water run-off has caused some washout on Plateau 26, and burning of vegetation was observed, potentially due to community burn to encourage new grass growth as cattle were feeding on fresh growth nearby. The IESC continues to recommend that a protocol be developed for GAC to measure and monitor success, so that expectations on habitat regeneration can be established and activities performance-driven.

The Corrective Action Plan workshop discussed the locations and design of potential wildlife corridors at length. It is important that GAC strategically plan the retention of wildlife corridors, in locations proven to be the most valuable for wildlife across GAC's concession (plus linking to other neighbouring concessions where appropriate). The lack of coordinated planning to date, with limited consideration of important corridors to be retained, will potentially cause direct conflict between GAC's infrastructure development and its plans for biodiversity corridor preservation. As GAC is operating in an area of Natural and Critical Habitat that contains species that move widely within and between concessions wide-ranging species, corridors are considered important; however they do not necessarily preclude mining activity, they just need to be factored in and infrastructure designed accordingly. A number of practical and theoretical options were discussed, linking known and predicted areas key for chimpanzees – the IESC looks forward to receiving more details on GAC's proposed corridor plans once they've further considered options for connection of ecological values, internal feasibility with the mining & infrastructures plans, and neighbouring opportunities where relevant.

Slides were received post-visit on GAC's weed control, although it is not clear the extent to which weed management is effectively stopping ingress of new species, reducing abundance or expansion of existing weed distribution. There have been challenges in sourcing labour in sufficient numbers to tackle weed removal, in transporting sufficient numbers of crew to work sites, plus health and safety concerns related to a snake-bites. It appears *Chromolaena odorata* is still the sole focus for weed removal as no other species are named or noted as being priority species. From visual observations at the reservoir, it appears that the invasive species bamboo, although considered native by GAC, has spread and may be detrimental to restoration efforts that GAC is pursuing. A number of recommendations are again included at the end of this section, and the non-compliance M10.8 retained.

Although there was no presentation on updated activities, costed workplans for 2024/25 were provided for the Bauxite Environmental Network (BEN/REB). To ensure all ESIA predicted and actual cumulative impacts are being effectively managed, the IESC again recommend GAC identify the specific cumulative impacts they are seeking to manage through the BEN collaboration, determine how these impacts are being monitored, and how is mitigation being demonstrated. Again, where there are cumulative impacts that BEN will not help GAC resolve within 2-3 years, GAC should propose how these gaps will be filled within that timeframe.

Biodiversity Monitoring and Evaluation Program (BMEP) implementation:

No presentation materials were provided to update the IESC on monitoring activities. Gaps in monitoring program implementation have been flagged in successive IESC reports, and Non-Compliance M10.9 was raised in March 2023. GAC have provided a memo from TBC regarding a gap analysis of biodiversity monitoring approaches relating to the BMP, the BMEP and the Biodiversity Action Plan (BAP). They note a lack of consistency and synergy between monitoring requirements in each document and acknowledge this would place an unnecessary burden to achieve them all. They found that not all required monitoring activities were initiated on the ground, whilst others were stopped for unknown reasons. The detail available in spreadsheets linked to the memo will be useful as GAC looks to refresh their monitoring program so that it delivers information necessary to understand whether impacts are being avoided and/or managed, plus en route to demonstrating gains in biodiversity associated with NNL/NG requirements.

Analyses of monitoring results for the purposes of comparison to thresholds for intervention or adaptive management are not yet forthcoming. By not analysing and interpreting monitoring results, there is a significant risk that GAC does not fully understand how well direct and indirect mining impacts are being managed and the resulting effects on priority species; this in turn affects GAC's ability to demonstrate progress towards NG/NNL and meet PS6 Para 17. Non-compliance item M8.9 (May 2022) is retained.

No update was presented on implementation of marine monitoring activities according to GAC's Procedure, or results gathered to date. The detailed, tabular schedule of marine biosurveillance activities as presented during the last visit was not updated/available. The recruitment of two new Technicians at Kamsar will be valuable in enabling dedicated attention to both coastal and marine impact management and monitoring activities.

There were no updates provided on freshwater studies across the concession, analyses performed, or adaptive management required. For last visit, GAC presented that water was to be prioritised as a focus area over the following 6 months; usage, discharge and all impacts that their operations may cause. As flagged in the last IESC report, the reservoir has still not been sampled ecologically, either traditionally or by using eDNA. As the water body has been created by GAC through the construction of the dam, the IESC's opinion is that the ecological characteristics of the reservoir itself should be better understood.

TBC have continued to provide targeted technical support to GAC's chimpanzee monitoring activities. The IESC noted earlier this year that new protocols had developed by TBC for camera trap installation and chimpanzee faeces for genetic analysis. GAC advised that their team of Para Technicians will shortly be going into the field for deployment of 91 camera traps at the mine, now using the updated protocol. Faecal samples were sent to Leipzig for analysis in January 2024. A combined analysis using findings from both surveys will be led by TBC and should be available in September 2024. Discussions during the workshop on wildlife corridors indicated that GAC could expect to produce updated chimpanzee population numbers across the whole concession by the end of 2025. This will be valuable as the Moyen Baffing Offset Program (MBOP) has been scaled to only account for potential chimpanzee losses across the southern part of the concession (including the reservoir footprint), not for the north – additional offset opportunities will need to be considered to fully achieve the required NG for the full concession. GAC committed to follow up with ARRC/ IUCN Species Specialist Group on Great Apes, to undertake a formal direct 'engagement' (ref. IFC PS6 GN, paragraph 73).

There was no information on monitoring of other terrestrial priority fauna or flora species.

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

GAC developed a methodology for calculating habitat condition scores (Quality Hectares, QH) several years ago which would be applicable for habitats both at the mine concession and the port platform. The assessment of condition has not yet been undertaken. The IESC awaits further update and encourage GAC with some urgency to consider how best the QH methodology can be used during development of the BAP and GAC's approach to demonstrating NNL/NG.

The IESC provided feedback on GAC's draft BAP for the last visit. Following Corrective Action Plan workshop discussions, the group agreed that TBC will hold the lead role in development of the next BAP iteration, as they have sufficient insight from supporting the development of CBG's draft BAP for the neighbouring concession. However, core aspects of the BAP should be informed by the Biodiversity Team, and their engagement in BAP collation and finalisation will be critical. There could be potential synergy and cost savings in GAC referencing/adapting the existing CBG BAP as they are currently further down the development path than GAC. AS noted above, to take account of the losses associated with activities in the north of the concession, the BAP scope should be expanded to cover both north and south. The BAP should include a description of how GAC intends to use area-based accounting alongside science-based targets for priority species to meet NNL/NG targets (and embellished further in Biodiversity Offset Management Plans, BOMPs, where appropriate). Workshop discussions reiterated the strategic importance of the BAP, and all parties agreed its continued development was a high priority. For the moment, the Jan 2022 non-compliance M7.1 is retained in the Issues Table until such time that a Lender/IESC approved BAP is available.

The outcomes from a land use change assessment (undertaken already), the QH condition assessment (not yet done), and development of appropriate metrics (not yet done), all need to be detailed within the BAP, and hence all contribute towards NNL/NG non-compliance; in this regard, non-compliance issue M4.5 is retained.

As no MBOP presentation was given during the site visit, there was no usual structured discussion between the IESC, Lenders and GAC. Specific updates were provided post-visit. More detail is included in Section 7.2.5.2. The MBOP Team restructured the offset site operation program at the start of the year, replacing the previous model where WCF was Implementation Partner. A labour broker was hired to source staff for field and office activities including a large number of personnel that were originally in WCF. Workplan and budgets were validated in January 2024, and a new Implementation Plan was finalised in May. During RINA's review end of 2023, the social management activities were being transferred to UPA, an organisation already working in the Moyen Baffing National Park (MBNP); collaborative activities were being negotiated – however the MBOP Team now advise that UPA is not currently operational. The IESC has sought additional clarification on actions taken/planned to address the potential implications from the lack of continuity if there has been a gap in social program execution. A Biodiversity Offset Management Plan has still not been developed. The Request for Proposals (RfP) to recruit the new Park Operator (under a Private-Public-Partnership model) is at an advanced stage of development but has not yet been released. Offers received from a prospective contractor to undertake the required ESIA to assess impacts related to the Park have been reviewed and GAC is preparing the contract for the work to commence. RINA's contract to undertake a further 3-yrs of annual review of the MBOP will commence with a visit in Nov 2024.

For the biodiversity offset at the Port, no program update presentations were provided although the workshop enabled detailed discussions on GAC's offset options related not only to mangrove restoration/protection but also for other NNL/NG priority species going forward. An updated residual impact assessment is required to fully understand the biodiversity loss that requires compensation, although with the consideration of multipliers due to the delays in

restoring functioning habitat that was lost as a result of construction and port activities. In essence, GAC has agreed to scale up their offset approach to identify broader protection measures for areas within the Rio Kapatchez Ramsar site, in addition to continuing small-scale mangrove planting campaigns nearer the Kamsar platform. By working to establish effective protection measures for existing mangrove at Rio Kapatchez, this should allow GAC to generate biodiversity gains in mangrove habitat by averting predicted, as the site is allegedly under threat from conversion to rice paddy. An offset program at this site will allow GAC to also undertake baseline studies and establish protection measures related to other priority species identified in their Critical Habitat Assessment (CHA). The IESC were encouraged by discussions around reframing this as a marine offset (rather than solely mangrove planting) so that all of GAC's coastal and marine NNL/NG could be targeted. GAC will design an offset program accordingly and provide further details in due course. In the interim, the non-compliance M3.10 (linked to the original Due Diligence ESAP item #41) is retained.

There were no updates presented on EGA's support to three marine studies to contribute towards GAC's NNL/NG for priority marine species. Funding for a 3-yr program had commenced in 2020, but there has been little follow-up in terms of findings and implications for GAC's marine program. GAC acknowledge they had lost touch with each of the three survey leaders (the work fell under the responsibility of the Biodiversity Specialist, post empty since early 2022). A new non-conformance is listed (M12.7).

Lenders have long encouraged GAC's original suggestion to support the establishment of a set-aside at Boulléré (considered a Key Biodiversity Area, KBA) for priority species, especially for restricted range species, affected by GAC's operations. Boulléré straddles the boundary between GAC's northern concession and CBG's South Cogon concession to the east. Previous IESC reports have recommended that GAC contract technical specialist support to help assess the opportunities/feasibility of preserving the ecological value that remains at Boulléré through a set-aside program, aligning with CBG efforts, plus develop a conservation plan to restore Boulléré. The IESC was told during this site visit that a consultant has now been engaged (by CBG) and is undertaking survey work to identify preservation options for the KBA. More information should be presented during the next visit.

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

No updates on ecosystem service impact mitigation were presented, and it seems there is still no systematic tracking of ecosystem service-specific mitigation measure implementation, either at the mine or port sites; neither is there analysis of whether the measures are effectively minimising impacts. The IESC are not able to determine the extent to which impacts to ecosystem services are being managed in compliance with Lender requirements (such as IFC PS6 Para 25).

As a result of discussions with Lenders 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).

The work has still not been performed, and thus identification of priority biodiversity and community areas has not occurred. In the meantime, widespread land use change continues. There should be more urgency in wider landscape planning as a priority to help preserve the ecological value that remains on the concession. The IESC acknowledge this is community-related land use change but is driven by the desire for compensation associated with the expanding footprint of mining. With no planned and managed pro-active intervention, there will continue to be widespread loss of habitat condition; this is a GAC indirect impact that should be included in any updated Residual Impact Assessment and loss gain accounting. The Oct 2019 non-compliance item M3.11 is therefore retained. This outstanding issue relates to open ESAP item ID-45 and also Nov 2022 non-compliance M9.3.W

GAC continue to develop a site-specific CBNRM program in the Thiouladjwol Valley, with the aim to protect the headwater and surrounding forest in the catchment. The IESC notes that external specialists SYDEV have been re-engaged to perform work associated with the CBNRM program. Through the CBNRM program GAC is working with the three communities that own the land in the Thiouladjwol Valley based on a 5-year agreement (2021-2025) to provide compensation and sustainable economic development projects to avoid agricultural activities and extraction of natural resources. Three projects (small ruminants, market gardens and honey production) are being implemented but with significant delays in rendering results, causing distrust and frustration among the affected communities. The communities are considering not to continue with the program after the current agreement expires

in September 2025. GAC needs to make considerable efforts to advance the implementation of the projects underway and implement the ones that have yet to be started. From a biodiversity management perspective, as noted in the last report, the IESC encourage GAC to demonstrate how the CBNRM pilot program will address unsustainable pressures on natural resources and how the program will make widespread natural resource use more sustainable.

Labour Management

At the end of May 2024, the project had 3,228 workers including 463 direct employees. Since December 2023, the workforce was increased by 20 (17 contractor workers, and 3 direct employees). In total there were 4 workers more than the previous year (March 2023). The number of expatriates working in GAC was reduced from 66 to 62 since the end of 2023. The total number of Guinean nationals increased to 401, 7 more than at the end of 2023 or 27 more since the end of 2022. With 49 foreigners in the contractor workforce, the percentage expatriates remained at 1.8%. The total number of female direct employees remained at 58, representing 12% of female of the direct workforce and the number of women working for the project through contractors remained at 150.

The proportion of Guinean nationals working for GAC has had a positive trend since September 2019 from approximately 80% to close to 87% in May 2024. The Guineanisation plan program continues to identify and support Guinean candidates to replace expatriates in due course. GAC has identified and is preparing 20 Guinean Nationals to substitute key positions currently held by expatriates in 1 to 4 years. GAC are in the process of identifying external candidates to cover an additional 5 positions currently held by expatriates for which suitable successors have not been identified internally and one vacant position that was formally occupied by an expatriate. Since January 2024, 21 Guinean nationals have been promoted in GAC, (20 men and one woman). With 49 expatriate workers in the contractors' workforce (one less than in December 2023), the percentage of Guinean nationals has also steadily increased from 95% in November 2020 to 96% in May 2024. The number of contractors' workers from the region where they operate (Sangarédi, Tanènè, Kamsar and Boké) has steadily increased from 2,383 in 2020 to 2,671 in May 2024, while the number of workers from affected communities decreased slightly from 580 in December 2023 to 574 in May 2024.

The Diversity and Inclusion Policy, which includes aspects regarding discrimination, harassment and bullying, continues to be implemented through the Libra Project, the Women's Committee and other initiatives. Women recruitment in 2024 reached 27%, up from 10% in 2022. Since January 2024, of the 21 people promoted, only one was a woman. GAC is planning to launch a mentoring program for at least 15 women in the organisation and increase the number of women-owned businesses in the procurement process by identifying and giving preference to companies owned by women. Although female participation in GAC has improved from 8% in December 2021 to 12% in May 2024, the percentage of women among contractor workers declined from 8% three years ago to the current level of 5%. Some requests from women such as additional time off for nursing, a space for nursing and day-care facilities for young children could help increase women participation. Other actions identified to improve diversity and inclusion are (i) improve awareness and training to increase confidence on reporting discrimination and other gender issues among employees, (ii) training members on the compliance team to manage sensitive issues, (iii) improve information to the board on gender issues, (iv) improve response time and feedback to people reporting gender related issues, (v) review the Code of Ethics to improve clarity on gender and inclusion issues, and (vi) improve training on the Code of Ethics for contractors

In March 2024 a collective agreement consisting of 17 points was signed with the Union, including a 7% wage increase retroactive to January 2024. Of the 17 points of the agreement, 4 were deferred to be reviewed by the labour authorities. Agreements were reached regarding (i) development of a study and models for a housing program for employees, (ii) rotation for local employees and statutory holidays, (iii) extended benefits for employees leaving the organization, (iv) revision of clauses related to the business committee, (v) contributions to a fund for social issues, (vi) increase health coverage to all children of employees, (vii) annual salary increase, (viii) long term employment incentive plan, (ix) management of multi-functions of employees, (x) creation of income-generation support (declined), (xi) support for transportation for Union matters, (xii) donation of used goods to employees (declined), and (xiii) education bonus. The four items that are being reviewed by the labour authorities due to different interpretations of the law by management and the Union are: (i) identification of Guinean candidates and substitution of expatriates in management positions, (ii) wages of expatriates and Guinean employees, (iii) cost of living and other bonuses for permanent employees (accepted) and disclosure of the salary scale and criteria for progression, (iv) disclosure to the Union committee of the carrier plan for all employees. Regardless of the results GAC is encouraged to improve communication with Union representatives. For example, although it may not be a legal requirement, it is considered a good practice to disclose salary scales. GAC's guineaisation process, although could be considered to have had modest gains, has been progressing. Additional communication and transparency in this regard, may help improve the relationship with the Union.

Human Capital (HC) informed that it had recorded 7 grievances during 2024, related to harassment and intimidation, transportation, dismissals, payroll, and strike notices. Five grievances had been resolved at the time of the site visit. The compliance department has a parallel system to record and manage grievances focused on GAC, contractors, and subcontractors, but also receiving and managing grievances from other stakeholders. During the June site visit, the IESC was provided with information indicating that there were 89 grievances pending resolution, 85 of them were by contractors' workers and 4 from GAC's employees. Other documents presented during the visit indicate that compliance had received 23 grievances 7 of which were substantiated. The apparent discrepancies appear be due to lack of integrations between grievances of direct employees vs. contractor workers, and to the fact that grievances are received through the compliance mechanism, directly through HC or through the department managing the specific contract. It is recommended that GAC engages a consultant to review the workers grievance mechanism.

Contractors conduct a self-assessment of their labour practices against Guinean labour legislation, GAC labour policies and Lenders' requirements. In addition, GAC conducts audits of labour issues of contractors based on a risk assessment. The audits conducted in 2023 observed that GAC does not have a demobilisation procedure in place, and that GAC is not auditing its subcontractors as required by its policies and procedures. In June 2024, GAC provided information regarding audits conducted to 16 of its subcontractors while there is no evidence that seven of their contractors were audited. The development and cascading to contractors of a demobilisation procedure is of crucial at a time where the contract with the main mining operator who engages close to one third of the entire workforce of the project is under review and may be allocated to a different firm. In previous site visits, GAC informed that in addition to the general labour audits, audits of the grievance mechanisms of contractors would be conducted semi-annually, including review of the status of grievances received by the general grievance mechanism; however, there was no evidence provided that indicate such audits are being conducted.

Social Management

GAC are in the process of reviewing all social components of the OESMS. The core documents for social management in the OESMS are the Stakeholder Engagement Plan (SEP) including the external communications and grievance mechanism, the Land Acquisition, Compensation and Resettlement Framework (LACRF), the Corporate Social Responsibility Strategy (Community Investment Strategy – CIS), and the related procedures.

GAC has mostly adequate resources for social management with the CSR manager supported by one staff and the Community Relations manager supported by 13 staff and 27 contractors. The CR function is organised in 5 areas: Land Access and Compensation, Resettlement, Grievance Management, Livelihood and Migration Influx, and Stakeholder Engagement.

Stakeholder Engagement:

GAC maintains a registry of each community, community representatives, contact information and number of interactions with each of them, to ensure the frequency of interaction adequate and commensurate with the project risks and impacts. Communities are classified and grouped in zones to facilitate engagement in a more efficient manner, focusing on those areas with higher impact or risk. There are, however, some communities with relatively low risk/low impacts that are not mapped and may be overlooked or neglected. For example, although operations do not have significant impacts in Taidy, GAC has engaged an NGO to implement a mangrove offset program in the immediate surroundings of the community, yet the community is not mapped or classified in the impact zone matrix.

As of mid-June, the CR department had recorded 803 interactions with stakeholders in 2024 engaging over 11,000 people, of which 30% were women. This is comparable to the number of interactions typically recorded in a six-month period. Most interactions were related to Resettlement (20%), Land Access (18%) Local Employment (15%) Environment (9%), Compensation (7%) and Livelihood Restoration (5%). Some notable differences in the topics of engagements from the previous period include a reduction in Land Access and Compensation, potentially due to a slow down on mine expansion, and an increase in Resettlement and Local Employment. The increase in communications related to Resettlement may be due to the efforts undertaken during the period to close the gaps identified in the resettlement completion audits. The increase on Local Employment interactions has been identified by the CR team as a crucial issue to be addressed in order to reduce social risks to the project.

GAC uses the Borealis system to record community engagement activities and to track output indicators, however, to take full advantage of the tool, it is necessary to improve the CR team members capacity to manage and analyse data to identify trends and adjust plans and programs to minimise social risks. GAC are encouraged to also develop and monitor outcome indicators.

GAC are using the boards to supplement other communication channels and provide a range of information including job postings, scholarship opportunities and general information about a variety of topics. GAC have initiated the development, posting and distribution of announcements with key messages published in English and Pular. During the first half of 2024 the key messages posted include information on noise and vibration, water quality, safety risks in the railway, sensitisation on the use of mining roads and prevention and control of bushfires. GAC also developed a mechanism to track the information posted in the community boards, however this is yet to be implemented.

GAC have developed a procedure to implement a Gender Strategy for the social management components, focusing on stakeholder engagement, resettlement, livelihood restoration and community investment. Women participation in community engagement and social programs undertaken by the CR team has been steadily improving but women are still underrepresented in CR activities with 30% participation. Male participation continues to be higher in local employment, compensation programs, consultation activities, engagement and community committees, while GAC has successfully increased involvement of women in livelihood restoration and income generation initiatives with over 55% of female participation.

Grievances and Conflict Management:

The CR Team with the support of communications department has developed and is distributing new flyers and posters in French with illustrations and posters to increase awareness and understanding of the community grievance mechanism. The information materials will be translated to Pular with Arabic character for continued distribution over the coming weeks and months.

In the first five months of 2024 GAC received 177 community grievances and at the time of the visit had resolved 168 in an average of 23 days. Most grievances were related to local employment (24%), resettlement (22%), land access (17%), environment (17%) and compensation (11%). The number of grievances increased significantly from the previous period where 78 were received. This may be due to an increase on the awareness of the grievance mechanism and improvement in the registration of grievances brought forth orally during community meetings.

GAC is supporting the development of mediation committees at the prefecture, commune and district levels. Between April and May 2024, 11 committees were engaged to clarify the roles and responsibilities of the members and the issues on which the committees can support the resolution process.

Social Investment:

GAC's has recently updated its Corporate Social Responsibility Policy and developed a Corporate Social Responsibility Strategy focusing on three areas: education, health and economic development. The new 5-year CSR strategy (2024-2028) was developed based on the assessment of sustainability of socio-economic development projects previously implemented and lessons learned from the previous strategy. In addition to the CSR strategy and other social investment initiatives, the company contributed in April to the Local Economic Development Fund (*Fonds de Développement Economique Local – FODEL*) as per Guinean legislation. FODEL funds continue to be frozen by the current government.

In 2023, GAC completed six of the seven initiatives of the 2019-2023 CIS, which were fully transferred for to the beneficiaries. Most projects appear to continue being implemented by the communities. However, some projects that had been successful have stopped operations. GAC is encouraged to monitor the outcomes of these initiatives as with relatively limited additional support the projects can provide significant benefit to the communities and become sustainable. This recommendation is aligned with the livelihood restoration assessment commissioned by GAC in 2023, which advised reinforced training on governance for participants of all projects, improve monitoring and assessment of productivity, and provide emergency support when needed.

Through the vocational program which has been supported by GAC since 2021, a total of 48 students (10 women) have been trained as mechanics, 23 of them are now working in their field. Currently 25 students (11 women) are being trained through the program.

The CSR strategy has a strong gender centered approach with the education element focusing on direct support to bring elementary teachers to meet UNICEF standards, increase enrolment rate and decrease absenteeism of girls by eliminating barriers to their education such as early marriage and lack of sanitary conditions. The health component also has a gender aspect, focusing on holistic support for women-child health. For the implementation of the economic development component, the CSR team has been working with the environment and mine departments to identify 400 ha of suitable land for commercial agriculture projects. Three areas have been identified in Petel Kindy, Kantambafenda and Poutere.

GAC has developed a process to receive, record, analyse and process requests from the communities for social development programs. As of June, GAC had recorded 12 requests from communities. GAC has established a “Governance and Ethics Committee” with the purpose of assessing community requests to ensure that the supported projects comply with GAC’s policies, procedures and values.

Employment has been identified by the CR team as a crucial and increasingly social risk for the project. GAC should develop a plan to improve employability of local community members. This may include integrating additional monitoring and support to local contractors to hire locally, implement programs that create local employment through the CSR strategy, working with the government to start applying FODEL funds in the region, and clearly communicating efforts and labour statistics to communities.

Community Health and Safety:

GAC keep a risk register updated regularly and continues to implement an overarching health and safety plan that refers to, and incorporates all initiatives related to the reduction and management of health and safety risks to its operations and the communities in their area of influence. 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 in the mining area. Currently GAC is in the process of building a metal bridge and alternative route for Sinthourou Thiouladji that is a safer option than the dam road currently used by the community. The construction of the route has suffered significant delays and is now expected to be completed by the end of 2024.

With the ongoing refurbishment of the railroad, additional train trips at a higher speed increase risks to safety in communities along the railroad. In coordination with CBG and CFB, new fencing and pedestrian bridges are being built. In addition, as part of the risk mitigation strategy the CR team conducts awareness campaigns on rail safety in villages along the railway facilities in their concession area. It is important to improve safety features of the railway infrastructure, and support the operator, as possible, to complete the rail signalling project and increase safety awareness in communities adjacent to the railway.

To reduce safety risks of blasting, an information letter is submitted to nearby villages in advance, and community relays notify community members of the place, date, time and safety buffer area limits 24 hours before each blasting event. The area within 1 km of each blasting is looked over and an alarm goes off 30 minutes before the blasting.

After an in-depth investigation conducted by the CR and Environment teams triggered by community concerns during the previous rainy season, GAC drilled and equipped 4 boreholes in communities in the area of the expansion of Plateau 26. As a result, 295 residents have access to drinking water. Additional measures need to be implemented to minimise the risk of red mud affecting communities and water sources in a proactive manner.

Besides informing the port authority of Kamsar the schedule of vessel movements for the transshipment to improve safety of fishers, in 2022 GAC distributed 5,000 personal flotation devices through fishers’ associations. During this site visit, a member of one of the fishers’ associations, informed that they have not yet distributed the devices because they do not have enough for all their associates. GAC should investigate if that is the case and facilitate the distribution of the devices as needed. In 2024 as a trial, GAC is in the process of purchasing radar reflectors and lights to assist fishing community in making fishing nets visible to marine traffic in the area.

Influx Management:

GAC are in the process of updating the Project Induced Influx Management Strategy (PIIMS), meanwhile they continue implementing elements of their 5-year Influx Management Strategy developed in 2018 with a focus on monitoring socio-demographic characteristics of the area and supporting local governments and villages to coordinate and manage population increase. According to a demographic study GAC’s area of influence completed in October 2023, population has increased from 12,001 in 2015 to 18,594 in 2023. Approximately 26% of the households are immigrants, with the higher proportion of immigrant households found in Filima district with close to 68%, followed by the Dambanthian with 34% and Tanènè Centre with 24%. The rate of immigration to the area appears to be decreasing with an approximately 24% of the migrants having arrived more than 2 years ago, 1.5% between 1 and 2 years ago, 0.36% between 11 and 7 months ago and 0.18% within the last 6 months. Review of the demographic study shows some discrepancies and potential misinterpretation of the data presented by GAC during the site visit. GAC is encouraged to review the information of the study and use it to support the development of the PIIMS.

In addition to the demographic study, with the support of GAC, community relays and other community representatives keep records of newcomers to each village. The reasons for arriving to each village and where are they staying are recorded. These helps the community keep track of visitors and ensure they are behaving in

accordance with community rules and local culture. However, the time that people expect or actually stay in the village is not documented and this data does not help to understand permanent migration and population growth of the villages. GAC is encouraged to review the records and procedures applied at each village and ensure consistency and completeness of the information to help understand and manage influx to the region and each village.

The areas of intervention of the Influx Management initiatives for 2024 are (i) monitoring of indicators of the impact of migration flows through workshops to present the results of the demographic study and migration flow trends at the district level, (ii) strengthening dialogue frameworks on migration for regional development through workshops with Boké prefectural committee and the Sangarédi and Tanènè communal committees, and (iii) implementation of measures to mitigate impacts of migration flows through the revision and implementation of the migration flow management strategy, and recruitment of a consultant to strengthen the capacity of local elected officials in management of migratory flows in 50 villages of the concession.

Security:

At the country level, two major events including a prison escape and the explosion of a major fuel depot towards the end 2023 in Conakry created a fuel crisis that sparked increased protests and crime rates. As fuel supply is recovering, the low level of water in hydroelectric reservoirs may cause power shortages and potentially protests. While there has been some opposition to the Government, this has not affected GAC operations. The political transition process has been marked by negotiations with opposition parties and civil society groups, but the timeline for democratic elections remains uncertain, creating some uncertainty for the following months.

In relation to GAC's operations directly, as the construction of fencing along the critical areas of the railroad ramps up between Kamsar and Tinguilinta, GAC is expecting disruptions from affected communities. However, after considering Internal and external risks it has been determined that security arrangements do not need to be modified and GAC continues to work with the private security contractor Lagupres who provides 450 unarmed guards (working 12-hour shifts) and with public armed forces under MoUs in place. Human rights, use of force and procedural security training is provided as part of the induction process and every six months for private and public security forces.

Land Acquisition, Compensation and Resettlement:

As part of the Land Acquisition, Compensation and Resettlement Framework (LACRF), GAC have recently developed three procedures to improve efficiency of mining operations, while minimising impacts to landowners and land users: a) the "High Value Land Identification and Displacement Impact Avoidance Procedure", b) the "Post Resettlement Action Plan Amendments and Accelerated Compensation Payment Procedure", and c) the "Cumulative Community Displacement Prevention and Mitigation Management Procedure". The revised LACRF and these procedures are in under management approval and will be incorporated in the OESMS. Once the process is completed, they should be disclosed in GAC's webpage.

Based on a landscape approach under development, GAC will be able to provide broader long-term support for viable livelihood restoration options for communities affected by their operations. Procedure to be developed will include aspects related to management of land acquisition and will be referred to in the LACRF, however the approach should be centred in protection of ecosystem services, community livelihoods and natural resource rather than land acquisition. GAC should make use of all the relevant management tools already under implementation to enhance the landscape approach, including those related to mine rehabilitation, influx management, land acquisition, livelihood restoration, biodiversity management, and community health and safety, among others.

Rehabilitation to the area's state prior to mine operations with natural vegetation has been prioritised; however, there is pressure from communities to use these areas for cash crops, subsistence agriculture or pastoralism. GAC has developed a Land Restitution Procedure to lay out the activities to be carried out with stakeholders to propose and facilitate the modes of access and use that will govern the areas rehabilitated by GAC, and eventually returned to local communities. The land restitution procedure does not include granting of the land title to the communities, but only a transfer of the rights of use and access. The eligible communities and individuals will therefore receive a right of usufruct. The procedure considers an integrated land management plan through the Community Natural Resource Management Programme, currently underway. GAC will engage communities proactively to avoid potential related conflict.

GAC is in the process of closing the two RAPs for physical displacement of 176 and 94 households respectively from Béli Kindy to Hakounde Thiandi (now also known as Béli Kindy), and from Dapress to Filima by implementing the recommendations of the completion audits done in August 2023. GAC have made progress with the improvement of the water system both in Filima and Béli Kindy installing additional storage tanks and new filters to reduce the iron content in the water. Beyond the commitments of the RAP and the recommendations of the

completion audit, GAC is also evaluating the possibility of increasing the number of water fetching points and have committed to repairing the roofs and install improved windows in the houses in both communities and to supporting Filima in the improvement and construction of additional latrines and showers for the growing population. The improvement of the waste management systems of the communities recommended by the auditors has proven to be a difficult task and GAC continues to support the initiative.

Close to 6 years after the resettlement of Dapress and two years after the start of construction of the artisanal centre, in June 2024 two blocks of workshops, a block of stores, and a multiuse facility have been completed, with the supply and installation of equipment expected in July. The transfer of the facilities to the artisans, however, is not expected for another three months pending the construction of a perimeter fence recently requested by the artisans. GAC has completed a graduation program for artisans and supported the creation and registration of an Economic Interest Group (EIG) that potentially can become part of GAC supply chain. As requested by the artisans, GAC is donating scrap metal and wood to the artisans for the production of crafts and is developing a program to support vulnerable artisans which include donation of food and school supplies for children and a health care initiative for sick artisans.

In relation to livelihood restoration of physically displaced people (and a host community) during the review period, GAC have supported 306 people, (96% women) through the improvement of the water supply system for the vegetable garden in Hakoude Thiandi and the creation of three additional women's group in Béli Kindy producing and commercializing soap, groundnut paste and dyed textiles. In Filima, the support for market gardens continues through the engagement an agronomist who has analysed the soil to define crops most adequate for the conditions. The disputed area adjacent to the village where market gardens are established is being used by both the claimants of the area and the people resettled in Filima.

As GAC continue to work with the communities addressing the gaps identified in the completion audits, they will also continue to implement social development programs through its CSR Strategy. It is important to make a clear distinction between actions to mitigate impacts of the resettlement process and corporate social responsibility aspects. In order to make that distinction clear for the community, GAC should consider using different teams to coordinate and implement actions aimed at mitigating impacts associated with the resettlement process and mine operations from CSR initiatives.

The implementation of the RAP of the relocation of 43 households in Sinthiourou Thiouladji uphill from its original location to avoid the risk of flooding from potential dam failure is underway. Construction of all housing and community infrastructure committed (mosque, school, and community multipurpose centre) has been completed. The water system has been installed and GAC are working on water treatment, well rehabilitation and training the community to maintain the infrastructure. The topographic study for the metal bridge over the Tinguilinta river for access to the community has been completed, but the construction of the bridge, which in January was expected to be completed in June, has yet to start and is now expected by the end of the year.

There are currently four livelihood restoration projects being implemented with the participation of over 1,200 affected people in 13 communities including the relocation of livestock of the 22 farmers affected by land acquisition in plateaus 20, 26 and 31 which is being finalised. The second phase of the rice production project in Taigbé is now underway with the expansion and consolidation of a dike, installation of pipelines for irrigation and drainage, provision of seeds and training on production techniques. These activities are expected to be concluded in Q3 2024. In plateau 26 south, 100 households are being supported on rice cultivation, market gardening, soap making, palm oil extraction and post-harvest processing. These projects were initiated in November 2023 and will continue to be supported until December 2024 before being fully transferred to the beneficiaries, once the projects are considered to be sustainable.

Cultural Heritage:

Since the completion of the SEIA, 11 additional cultural sites have been identified through the continued implementation of the Cultural Heritage Management Plan including the Chance Find procedure and consultation with communities. Two of the recently identified cultural sites are non-replicable and are being protected. With the primary objective of increasing the protection and securing the 92 irreplaceable cultural sites, GAC has launched a project to install permanent signage beginning in July 2024. Although the signage will help protect the sites, there is a possibility that bringing attention to some cultural sites to people from outside the region or that do not share the same cultural practices, may increase the risk to those sites. GAC is encouraged to assess this risk and only install the signage after risk mitigation measures are implemented in consultation with the people for which these sites as significant.



RINA Consulting S.p.A. | Società soggetta a direzione e coordinamento amministrativo e finanziario del socio unico RINA S.p.A.
Via Cecchi, 6 - 16129 GENOVA | P. +39 010 31961 | rinaconsulting@rina.org | www.rina.org
C.F./P. IVA/R.I. Genova N. 03476550102 | Cap. Soc. € 20.000.000,00 i.v.