



Plateau 20 Restoration IESC Visit January 2024

Guinea Alumina Corporation Conakry, Republic of Guinea

GAC PROJECT

IESC Monitoring Report: Eleventh Monitoring – Site Visit January 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	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)
CE	Critically Endangered (on IUCN Red List)
CEMED	Multi-Consultancy on Environment and Development Expertise Firm (Cabinet d'Expertise Multi-Conseils et Environment et Development)
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
COVID-19	Coronavirus Disease 2019
CR	Community Relations
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
FSPMCICA	Professional Trade Union Federation of Mines, Quarries, Chemical and Similar Industries (Fédération Syndicale Professionnelle des Mines, Carrières, Industries Chimiques et Assimiliées)
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
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
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

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 30th July 2019, and is now fully operational with a focus on improving efficiencies and progressively. 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 16.7 MT in 2024 through getting 26 trains/week. Future targets are 18 MT in 2025 and 20 MT in 2026.

This report presents the IESC's findings of the Project status at the time of review of the eleventh 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 22nd and 25th January 2024, with a wrap-up session on Thursday 25th January 2024, with the lenders and IESC departing for Conakry early on the 26th January. Due to Covid the IESC biodiversity expert undertook their review remotely supplemented by the observations from the IESC EHS and Communities Experts. 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 16th February 2024, to provide the IESC more clarity or verify several discussion items. The monitoring visit was initially planned for November 2023 but was cancelled due to security concerns in Conakry at that time. This monitoring visit therefore has considered a longer period from April 2023 through to the end of December 2023.

The site visit enabled the IESC to meet some of the new management in the ESG and Environment teams in person and undertake detailed discussions and review of GAC's management systems and operations. 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. This visit was shorter than the previous visit due to the need for travel time to and from Conakry and was completed in 3.5 days. For the community team this restricted the number of visits which they could undertake.

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 Environment and Communities to the CEO, H&S (including Health), 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.

Since the last audit there has been some reorganisation of the environment and biodiversity team reflecting the outcomes of a review by the Environment Manager who joined in 2023, and the loss of one team member to another mining company (Rio Tinto). The revisions to the team have included a review of job descriptions and development of KPIs, with the aim of increasing competency and performance and the improving the culture in the team. GAC presented the training to be undertaking in 2024 which included Borealis, training in We-Enviro GIS, TBC Protocol for monitoring Chimps, Support for Marine team, Biotope training after Lenders (Quality HA Method). In addition, the IESC recommends that there is training to the various levels within the team as part of their personal development and progression in GAC.

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).

This team along with the Community Relations team now report to GAC's new Community, CSR and Environment Director. This new director position will report to the CEO and is understood to provide a more strategic direction and also tie into the management of areas such as the Aluminium Stewardship Initiative (ASI). Based on the initial impressions, the IESC considers that this new Director position should strengthen ESG at GAC.

Safety Management continues to be managed separately from Environment and Communities, with a direct report from the HSE Manager to the COO. The HSE Manager has two reporting lines to him, one for the Mine and one for the Port. The Chief Medical Officer is based at Kamsar and is responsible for health across GAC's operations. This position also reports to the CEO and has medical staff and offices (including ambulances) at the Mine and the Platform/Port. This structure is well established and appears successful in managing the risks in these areas.

For biodiversity and natural resource capability/capacity within the Environment Team, see detail in Section 7.2.2. In summary, the Biodiversity Team currently still lacks a senior Biodiversity Specialist, following the previous incumbent's contract not being renewed in early 2022, then the external consultancy Okapi's contract being curtailed 7 months early, then a further single Biodiversity Specialist contractor not renewing their contract at the end of 2023. 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. As the IESC Biodiversity Specialist was not present on site during this review, further observations on Team capacity and resources will be a focus area of the next visit.

The social management function is divided into two main areas: Community Relations and Social Investment, 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.

Management Systems

GAC's Environmental Management System (EMS) and Social Management System (SMS) procedures were in the process of being updated, and the team responsible appeared to be managing the need to upload updates to EGA's SharePoint DMS. On this occasion there was fewer concerns raised about not having the documents locally under GAC's control. GAC with the support of its consultant is now in the process of updating the Standard Operating Procedures (SoPs), many of which are now very dated. There is now a planned return to using Borealis for data management (with a trainer due to attend and increase user knowledge) and there will be the necessary effort to load the missing data to the system. It is critical that when this is done, adequate QA/QC reviews are carried out. The Environment team is using VelocityEHS to track its incidents and actions (i.e. following the approach in the H&S team). Borealis is still effectively used by Communities. Much of these improvements have been driven by management systems consultant (THOR) and new Environment Manager, and lessons from the ASI audit.

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 operations on these Plateaus. The IESC considered that GAC needed to fully review and provide written clarification whether a further ESIA Addendum/Addenda was necessary to comply with Guinea's ESIA regulations. GAC have now reviewed the situation, noted that this is a breach of 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 – the non-compliance M10.1 is retained in the Issues Table until these can be reviewed.

Environment

Over the last few months GAC has been reviewing its operational environmental management strategy, undertaking a water and air risk assessment, updating the water monitoring (incl. IWMP) and air, the waste strategy and management, and the biodiversity programme management. In addition, it has strengthened its monthly EXCO reporting (so issues can be escalated as needed). These changes have come about following the review by the Environment Manager (joined in 2023). The changes will be occurring through 2024 and supported by external consultancy THOR.

These changes recognise an issue raised previously by the IESC that data collection was not resulting in it informing management decisions, it is considered that if these changes are successfully implemented, and senior management alerted to breaches, compliance with the Project standards will be better ensured as well as continuous improvement achieved.

Based on the environmental score card (in GAC's Q4 2023 Monitoring Report) and discussions GAC environmental performance has continued to be good with no regulatory notices or major environmental releases. In 2023 there

were 46 environmental incidents ranging from minor oil spills (the most frequent issue) to excessive blast noise or unauthorised land clearances. Contaminated soils are removed for bioremediation at the Tinguilinta waste management area.

Greenhouse Gas Emissions

GAC has continued 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 over Q4 2023 are above the Bauxite industry benchmark, although both continue to decrease over the quarter and in December 2023 GHG intensity dropped below the benchmark for the first time. This data feeds through into the publicly disclosed data in EGS's sustainability report, which includes the commitment to net zero in 2050. The KPI sheet also tracks land management (permits, land cleared etc.) and biodiversity and restoration, as well as training and awareness.

GAC's reviews of its system has picked up that within the current team there is no longer an 'owner' of the GHG data, and no verification and auditing. Actions are being put in place to address this. Given EGA's stated aim of zero GHG emissions by 2050 and stated aspirations (on EGA website) to review other low GHG power sources (not just the on-site diesel power plants) and consider electric light vehicles and biofuels, having robust GHG data now is crucial to feed into future decisions.

Overall, GAC is meeting its targets. The exception continues to be for GHG intensity (kg CO₂-eq/Mt) although it dropped below the bauxite industry benchmark of 5.0 in December (and was lower than December 2022) September to November ranged from 5.91 to 6.8 kg CO₂-eq/Mt. It is recommended 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 if this data is available. This could provide GAC with more focus areas for GHG emissions reduction if the industry data is available.

Total Scope 1 GHG emissions for 2023 were calculated as 78,462 t CO_{2eq} a slight increase on the total for 2022 (76,381 t CO_{2eq}). The monthly emissions averaged approximately 6,540 t CO_{2eq} and showed less variation than in 2023. 2023 continued the trend of increasing absolute volumes of GHGs due to the increasing exports, the energy intensity continued to decrease indicating an increasingly efficient operation.

Water Use and Monitoring

The period since the tenth IESC monitoring visit, comprised the end of the wet season and start of the dry season and water use has ranged from 9,000 m³ in September to 31,400 m³ in December 2023. Total water usage in 2023 was 322,400 m³. This equates to an average water intensity over 2023 of 0.023 m³/t of ore exported which is similar to 2022, and significantly lower than the industry average of 0.404 m³/Mt.

GAC brought in a consultant hydrogeologist in Q4/23 with the brief of undertaking a full review and assessment of GAC's water monitoring. The scope of works covers all the discharges, extraction (including campsite and community boreholes), and tracking usage across the Project. The outcomes will be, as needed, repositioning the measuring points, adjusting procedures and protocols, as well as building the capacity of the team. This included a focus on the sewage treatment plants which still have compliance issues.

Currently surface water quality data are collected at nine surface water points, and groundwater at 13 rated control points, there is also water flow data is collected at five points. Surface water quality will also be measured at these locations. GAC is considering installing limnometric scales to enable water levels corresponding to given flows to be verified at any time (without the need to enter the river). Meteorological data, including precipitation, will be collected at the mining area site. The work will result in ownership of the data being in the team and assist avoid errors in the reporting. The use of Borealis as proposed will also assist address this latter point.

The review of the flow monitoring in the Tinguilinta should be an opportunity for GAC to resolve the clear errors in the current data, which report higher discharge rates higher in the catchment compared to locations downstream (errors which are unlikely to be attributed to calculation errors, and possibly sampling on different days and changes in rainfall). The installation of limnometric scales will also speed up monitoring and assist resolve these issues.

Waste Management

The main change to the waste management area on the Kamsar Platform was that the incinerator was now only being used for medical waste. This has led to a buildup of some wastes previously incinerated as well as other wastes streams while GAC's team set up new waste disposal contracts following the audit and review of its approved contractors. At the Kamsar site a new area was being used to store plastic waste and oily rags. Similarly, at the Tinguilinta waste management area the incinerator was only being used for medical waste, and with the issue

of the time to approve new waste contractors, waste was building up. The mixed cardboard and plastic waste was the most significant part of this waste volume. GAC was confident that these issues would be addressed through the new waste management company contracts (and once fuel was readily available in the country and collections can start). GAC is also revisiting the need for a landfill to be constructed to manage some difficult waste (such as incinerator ash). If constructed it would be to the north of the existing waste management area.

Air Emissions

GAC has been continuing its monthly air monitoring of particulate matter (PM_{2.5} and PM₁₀), and as part of the review of the strategy has identified the need to move some locations due to the lack of mobile signal which allows the data to be automatically downloaded. This lack of a signal affects the ability of GAC to detect and respond to dust issues in real time and requires regular visits by a technician to these locations to collect the data. Plans to rectify this are underway and would expect to be in place after Q2. In this review of monitoring, GAC has identified that some of the monitoring is poor quality and there is insufficient monitoring of stacks/exhausts for compliance. There is also no external verification audits and QA/QC issues are present (such as for the water monitoring). The IESC is satisfied that GAC has now recognised the issues and the required actions and is developing a plan to address these ties into the planned move to Borealis.

GAC reported that there had been no issues regarding compliance with the 24-hour limit air emissions limits. 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. GAC reported that it is testing the use of an additive Cypher's DUST/BLOKR[®], which is reported to be non-corrosive and environmentally friendly, and which if successful should result in a reduction in the required application of water and a reduction in dust emissions.

Health and Safety

GAC has brought in a Mine Safety Advisor to increase its focus on this area which is seen as the highest risk part of the operation (also reflecting the improvements in other areas which GAC has achieved. There is also a new Safety Contractor Compliance Officers appointed. These improvements assist offset the loss of three safety officers to another mining company (Rio Tinto). Safety training being undertaken also includes GPC and DTP (both of whom are losing some staff to Rio Tinto). GAC also now has a female safety officer. GAC is placing some additional focus on succession planning within the team.

GAC's H&S team provided an update on the use of VelocityEHS to manage its H&S system. This is considered to be functioning well and allowing the team to successfully track actions and issues. VelocityEHS is also reported to be accepted by DTP and GPC who report into it. GAC continues to use EGA's SharePoint and had success in getting agreement for a parallel French language version of the documents. GAC's H&S lead and COO and CEO have undertaken a review of the OHS Management System as part of an annual review of the Project and compared it with the mineral industry risk management materiality matrix, which found GAC to be compliant.

While there are no significant H&S risks, GAC's H&S team has a focus on H&S risks around the ramp-up and also a focus in 2024 will be managing risks around a planned big refurbishment of some of the large areas.

The walkover of the areas of the operations did not identify any areas of H&S concern. The significant improvement was at the water treatment plant in the Tinguilinta camp. This unit has been totally replaced and almost all of the H&S risks removed. The remaining areas of concern at this location was that there was no locally held PPE and also there was no emergency eye wash (or shower) which is consider a necessity given the use of water treatment chemicals and risk of splashes. A review of the placement of all eyewashes and emergency showers is recommended.

H&S data was presented in GAC Q4 Safety Performance Review and discussed during the site visit. At the end of the year GAC's lost time incident (LTI) rate (which includes subcontractors) was zero. GAC's Total Recordable Incident Frequency Rate (TRIFR) was 2.2 at the end of 2023. No significant medical issues were reported, and GAC continues to respond to and educate on malaria prevention around the wet seasons when there are spikes in cases.

Biodiversity

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

- ✓ There are no new PS6-relevant areas of non-compliance, and none closed;
- ✓ In total, there remain 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.

The IESC Biodiversity Specialist was not present in country so were not able to observe directly. All observations are derived from GAC's provided ppt presentation files and accompanying documents.

Biodiversity Team staffing, resources and resilience:

The Biodiversity Team again lacks a senior Biodiversity Specialist; the last staff incumbent left the company in April 2022, Okapi consultants were present Nov 2022 to June 2023 (when their contract was curtailed seven months early), and another individual consultant was present July to Dec 2023 then chose not to renew their contract. The core personnel of Biodiversity Superintendent, Biodiversity Supervisor and Senior Technicians are still in place. GAC again has contracted a number of external resources to supplement the core Team, many of whom have worked with GAC for several years; however, a senior internationally experienced biodiversity management specialist would help manage the work program in a way that would deliver a Lender-compliant program.

GAC presented that the last 6 months have focused on a review of the structure, roles and performance in relation to gaps flagged by Lenders/IESC and other audits. The process is ongoing to ensure the Environment and Biodiversity Teams are fit for purpose for a Lender-compliant program. The gap analysis also identified areas for training that have been flagged for some time, including GIS training, chimpanzee monitoring, marine monitoring and quality hectare methodology application.

Continued implementation of the biodiversity work program through 2024 will indicate whether the support above is sufficient to enable a PS6-compliant work program to be undertaken, and that training availability and capacity of resources in the Team are improved.

Biodiversity Management Program (BMP) implementation:

For the last review, Okapi had provided a progress-status spreadsheet noting percentage completion of a number of their key BMP topic areas. For this review, although again requested, GAC did not provide a systematic update on the implementation of all BMP general & species control measures. Due to the Biodiversity Specialist not being present for this visit to make direct observations, a review of the full BMP implementation will need to be undertaken during the Completion Certificate review during 2024.

GAC incident presentations note an unauthorised ongoing pipe discharge occurred into mangrove habitat at Kamsar during 2023. Following visual inspection and initial investigation the discharge was stopped. GAC identified that an oil/water separator was missing from the wash bay. Incorrect pipework design changes had meant that a treated effluent, a brine, and water from the power plant all combined and were being discharged at this pipeline point. GAC did not state whether there had been resulting investigation into the ecological health of the receiving mangrove habitat as a result of these unauthorised discharges.

Lenders will recall observations in recent IESC reports around a lack of due process in ore appraisal activities at Plateau 7 (and Plateau 15 before that), where no biodiversity impact assessment had been conducted prior to opening access into new areas in the north of the concession for drilling activities. A memo to IESC indicates that a review was undertaken of the land disturbance procedure for these events. GAC identified gaps in the process including instances where no pre-clearance risk or baseline assessments were recorded, indicating that formal process approval and sign-off lacked the required rigour. GAC also found instances where there was no evidence of linked mitigation strategies when disturbance permits were requested. As a result of the review, corrective actions are being implemented and that the non-conformance, the review and resulting changes have been discussed at Production meetings and at ExCo.

The goal for 2023 was to reinstate and revegetate 120 hectares of mined land with local species, and to buy 80% of the plants from local nursery groups supported by GAC alongside recruitment of community members to support the revegetation process. GAC reports that planting was undertaken primarily through the rainy season, Jul-Oct. Twenty-five day labourers were recruited for the replanting, with the supplementary aim to raise awareness amongst community members of the value of natural resources. At the end of the campaign, a total of 124 hectares had been replanted, using over 108,000 seedlings of local species within GAC's Rehabilitation Procedure. GAC report there was sufficient quantity of top-quality topsoil preserved from site clearance to provide good soils for planting.

There was no update on analyses on priority species distribution, the identification and preservation of wildlife corridors, or road-routing plans intended to protect corridors and minimise fragmentation. When writing this report and liaising within the IESC team, the IESC Biodiversity Specialist learned of GAC's plans to build a new metal bridge over the Tinguilinta River to facilitate access to the national road. This also needs to be considered from the perspective of allowing increased vehicular traffic into an otherwise low traffic area, with related implications for

preserving ecological values in the Thiouladjiwol valley – GAC should provide PS6-considered information to IESC/Lenders on this development ASAP.

GAC have developed a tracking tool for registering records on the removal of weeds e.g. quantities of plants removed, area cleared, etc. GAC reports this tracking tool is used by the Operations, Environment and Infrastructure Teams. GAC state improved communications between the teams as resulted in improved removal of invasive species. The IESC appreciates that that records are now being kept of which weeds are cleared from where, but data should be maintained consistently. The data tracked during the year has not been consistent and areas of square metres cleared is not shown for each month. Lenders have requested the square metres of areas cleared of weeds a number of times, so GAC should ensure these records are captured and presented. The tracking tool indicates that *Chromolaena odorata* has become a significant challenge at the mine site, even though this was not recorded during site baselines. GAC note a number of constraints that have hampered implementation of the program over the last 6 months, including sourcing sufficient numbers of labourers and transportation, plus presence of snakes.

Regarding cumulative impacts, no update was provided on the BEN work program or progress. To ensure all ESIA predicted and actual cumulative impacts are being effectively managed, GAC should identify the specific cumulative impacts they are seeking to manage through the BEN collaboration, determine how these impacts are being managed and monitored. Again, where there are cumulative impacts that BEN will not resolve, GAC should propose to Lenders how these gaps will be filled as a priority.

Biodiversity Monitoring and Evaluation Program (BMEP) implementation:

GAC acknowledge that their marine monitoring program has taken time to get going. They state there is now a plan in place, resources are available, the Team is trained up and the program has started. A schedule is shown in Section 6.6.4.1. A graduate and a Technician have been appointed to roles focussed on marine monitoring, based at Kamsar. GAC are negotiating for access to boats and crew (a boat for dedicated monitoring use will be sourced in 2024) as Marine Mammal Observer monitoring was meant to be in place since 2017 (when the BMEP was developed). GAC is yet to provide an update on the benthic habitat monitoring (required annually since 2017) to assess the status of, and pressures on priority fish species potentially affected by GAC: these are the Daisy Stingray and the Blackchin Guitarfish. There was again no update provided on the specialist external surveys intended to support scientific research on African Manatee, Atlantic Humpback Dolphin and marine turtle species, meant to run from 2020-21 for an initial 3-year period. GAC state they have undertaken a gap analysis and intend to perform a correctly designed fully resourced monitoring program, along with comparisons against baseline, by end of Q2 2024.

For freshwater species monitoring, GAC advise that their external surveyors have completed studies during 2023, including presence/absence and distribution/abundance of priority species. GAC did not present results during this or the last IESC review on SAMEC's freshwater ecology or herpetofauna studies, the significance of these results or analysis of the survey findings, or an interpretation of what the results might mean in terms of adaptive management in GAC's operations. The reservoir itself has not been sampled, whether using traditional techniques or by using eDNA. As the water body has been created by GAC through the construction of the dam, it is IESC opinion that the ecological characteristics of the reservoir itself should be better understood. GAC state that water has prioritised to be a focus area over the next 6 months; usage, discharge, and all impacts that their operations may cause.

As part of terrestrial monitoring, GAC's external consultants TBC (The Biodiversity Consultancy) have provided targeted technical support during 2023, a large part of which is related to chimpanzee monitoring responsibilities under IFC PS6. TBC have now developed a protocol for camera installation and for the collection of chimpanzee faeces for genetic analysis, as per the requirements of the Chimpanzee Data Collection Methods procedure – a schedule is presented in Section 6.6.4.3. GAC has camera trap data for the past three to four years. Although images are reviewed for priority species, they have not yet informed any spatial or temporal analysis across the concession.

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

A Preliminary version of GAC's Biodiversity Action Plan (BAP) has been developed by Okapi and given to the IESC for review (detailed feedback provided separately). It includes detail on the species that trigger Critical Habitat (or not) and repetition/reinforcement of mitigation measures in the BMP and Procedures. The BAP reinforces in detail the case for why a BAP is necessary. However, there is very little detail on options that GAC will take to achieve

biodiversity gain in key priority species and habitats to attain NNL or NG (no net loss/net gain). It does not yet sufficiently consider or present technical detail observed in other good international industry practice BAPs, such as: identifying appropriate metrics for NNL/NG accounting; baseline data that will be used as a reference from which to measure gain; timeframes over which NNL/NG will be attained (then maintained); what counterfactuals have been used and why; assumptions used or uncertainties accounted for; potential threats to achieving sufficient gain; whether multipliers are deemed appropriate, which multipliers will be used and why; whether the use of proxy indicators might be necessary or appropriate; specific targets (and interim targets) to ascertain whether biodiversity gain progress is sufficient or timely; inclusion of residual impacts associated with drilling and other activities in the northern part of the concession; nor suggestions for monitoring whether progress is on track. There is little detail on how the Moyen Bafing Offset Program is intended to offset significant residual impacts on chimpanzees even though the program has been in place for several years. Similarly, there is little detail on how GAC's mangrove restoration activities will form part of a mangrove offset program in line with good international industry practice. GAC note the Preliminary BAP is undergoing review and edit by TBC.

GAC presented they are reviewing their approach and method for how to track NNL/NG in relation to Quality Hectares (QH); this relates to the methodology that was developed for them by Biotope in 2022.

With activities now taking place in the northern half of the concession (as noted above in Section 7.2.3.4), GAC will need to update the scope of the BAP, reassess their biodiversity loss (and gain) calculations, in addition to updating the residual impact assessment.

Detail is provided in Section 7.2.5 on GAC's Moyen Bafing Offset Program (MBOP) for chimpanzees, including: monitoring missions to the Moyen Bafing National Park; development of an MoU with the government; the loss of implementation partner Wild Chimpanzee Foundation, and the change of offset management model to one managed directly by GAC and CBG; that social management programs in the Park are being transferred to a Canadian organisation, UPA, so no longer under the direct control of the MBOP; the PPP feasibility study is finalised and the Request for Proposals will possibly be published in March 2024; there is still no Biodiversity Offset Management Plan to guide progress in offset implementation; offset expenditures to date are described. Under separate contract from this IESC contract, RINA has undertaken a third review of the MBOP and draft report provided in Dec 2023; factual corrections and feedback have now been received and the report will be finalised during March 2024. The report contains a considerable number of recommendations for compliance with IFC PS and good international industry practice.

At the port, prior to the construction and operation of the Kamsar platform, the original 2015 estimates of direct footprint residual impacts on mangrove Critical Habitat required a biodiversity gain of at least 68 ha to enable net gain. Since that time, GAC's external contractors Guinee Ecologie have attempted a number of small area pilots of mangrove propagule planting at both Taïgbé and Taïdy very close to the platform, each of which have not yet proved successful. Following Okapi's review of progress to date, Guinee Ecologie is again to plant propagules at Taïgbé and Taïdy plus now also at the Rio Kapatchez, a Ramsar site under considerable threat from habitat degradation to the south of Kamsar. Jan 2024's presentation states the objectives of the program include reforestation and reclamation of 70 ha of mangroves, alongside implementing initiatives to support local economic activities. GAC states that 50 ha of mangroves will be planted in 2024, and restoration work on abandoned rice fields will commence. The IESC notes GAC's efforts to date and continued planning, however flags that the original estimate of 68ha needs recalculation based on direct and indirect impacts post-construction, and that the time lag between platform construction commenced and the restoration of fully functioning mangrove habitat will require consideration of multipliers and/or some expansion of targets to achieve sufficient NG. The IESC have repeatedly recommended GAC scale up their approach so that the offset program is more aligned to good industry practice. Okapi highlighted in March 2023 that the Guinean government will potentially make the Rio Kamsar watershed a formally protected area, following commitments made at COP15 in Montreal. The prospects for GAC to support larger-scale mangrove preservation at an existing Ramsar site, recognised internationally for its wetland importance, that is purported to be under threat from land use change, appears to be a perfect opportunity to scale-up, design and implement an offset program that meets Lender requirements.

Legally protected and internationally recognized areas i.e. Key Biodiversity Area (KBA):

Regarding onsite set-asides, previous IESC reports have long recommended that GAC contract technical specialist support to help assess the opportunities/feasibility of preserving the ecological value that remains at Boulléré, aligning with CBG efforts, plus develop a conservation plan to restore the Boulléré KBA. Slides provided by GAC during this review indicate that set-aside management plans are being developed for Dambanthiam and Boulléré; the same locations as the original Community Based Natural Resource Management (CBNRM) areas undertaken by contractor SYDEV several years ago; that phase of work stalled once the management plans were developed. Priority objectives of the Plan are provided, although the work appears to align more closely to a CBNRM program

than what would be expected in a conservation-based set-aside. The ecological values at either of the two areas have not been determined through updated baseline information, or their preservation feasibility presented. The program seen to date does not appear to target scientifically robust, conservation-based objectives and activities as would be expected for a set-aside aligning with Lender expectations. There has been no confirmation that these areas are excluded from GAC's mining plan (i.e. set-aside). As the IESC Biodiversity Specialist was not on site, this will be a target issue during the IESC's next visit.

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

From slides shared, it appears there is still no systematic tracking of EcoS mitigation measure implementation, either at the mine or port sites, or 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).

Although a Terms of Reference (ToR) was circulated in 2021, no update was available on recruitment of this consultant. In the meantime, widespread land use change continues 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 that should be included in biodiversity loss: gain accounting.

GAC continue to develop a site-specific CBNRM program in the Thiouladjiwol 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. As noted above, this work was presented as a 'set-aside', although does not align with the requirements of a set-aside. 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 December 2023, the project had 3,208 workers including 460 direct employees and 3,092 contractors' workers, 18 less than at the end of the previous year. GAC direct employees grew by 25 employees from the end of 2022 to 460. There were 66 expatriates, 4 more than the previous year, and 394 or 20 Guinean nationals more than at the end of 2022, maintaining the percentage 86% reached in March 2023, compared to 80% in September 2019. Through the Guineanisation program GAC continues to identify and support Guinean candidates to replace expatriates in due course. However, given expected increase of mining operations in the country, skilled workers with management experience will likely become increasingly harder to recruit and retain. The percentage of expatriates in the contractors' workforce is 1.8%. The trend of contractors' local workers (from Sangarédi, Tanènè, Kamsar and Boké) in relation to the total workforce has also generally increase from 2,383 in 2020 to 2,668 in March 2023, with a slight decline in December 2023 to 2,660, as a result of a decrease on the total number of workers, although the percentage of local worker continued to increase over 2023 from 95% at the beginning of the year to 96% in December.

GAC continues to implement the recruitment process with the aim of strengthening diversity and inclusion while prioritising recruitment of local community member. The total number of female direct employees was 47, an increase of 6 from March 2023, reaching 10% of female participation in the direct workforce (up from 9% the previous year). There were 160 women working for the project through contractors, 28 less than in March 2023. The percentage of female participation remains at 6% for contractor workers. Women recruitment in 2023 reached 26%,

up from 10% in 2022. Requests from the Women's Committee such as allowing for a dedicated space and additional time for nursing, and day-care facilities for young children would help reduce the gender gap.

The "Libra Project" launched in 2022 to improve the climate of the organisation, foster gender equality and reduce the risk of GBV and harassment continues to be implemented. Based on a comprehensive survey directed at all GAC and contractor workers to better understand potential issues related to discrimination, harassment, and bullying, GAC developed an action plan, which includes training and education, and revising the workers grievance mechanism to ensure that concerns of retaliation expressed in the survey are addressed. GAC is considering hiring a consultant to address the fear of retaliation among employees and contractor workers. 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.

The new Union executive committee considers that the gap in salary and benefits between GAC direct employees and those hired through labour brokers by contractors and between Guinean nationals and expatriates of similar positions needs to be addressed. GAC is encouraged to develop and implement a housing strategy, which can address issues related to transportation, turnover and workers concerns with gaps between benefits for expatriates and local workers. Training for the new union executive committee has not been provided due to disagreement on the institution that will provide the training. This needs to be resolved as soon as possible to help the executive committee act in a more efficient and productive manner.

In the previous supervision, it was reported that Laguipres, the security service provider and contractor with the second most workers in GAC (over 450), had not allowed their workers to form a union as required by Guinean legislation. With the support of GAC, who enforced its contractual agreement with Laguipres, in August 2023, Laguipres workers were incorporated to the Professional Trade Union Federation of Mines, Quarries, Chemical and Similar Industries (FSPMCICA).

There were discrepancies reported in the workers grievances information provided. This may be due to lack of integrations between grievances of direct employees vs. contractor workers, or grievances received through the compliance mechanism vs. directly through HC or other issues. The lack of consistency on registration and management of the workers grievance mechanism has been an issue that has been identified and addressed on several occasions since the start of operations. In addition to hiring a contractor to address issues of fear of retaliation when using the grievance mechanism, as GAC is planning, there is also a need to engage a consultant to review the grievance mechanism and ensure consistency of communication and awareness of the mechanism for direct and contractor workers, registration, and management of all workers' grievances.

Contractors conduct a self-assessment of their labour practices against Guinean labour legislation, GAC labour policies and Lenders' requirements. In addition, 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). Audits conducted by HC during 2023 included issues related to industrial relations, recruitment, remuneration and benefits, working time, communications and disclosure of workers' rights, workplace management, freedom of association and collective agreements, child and forced labour, discrimination and harassment, transportation, accommodations, safety and security, training and demobilisation. Samples of audits provided as part of the supervision visit indicate that full audits of grievance would be conducted at a later time. Considering the inconsistencies found in workers' grievance management, this needs to be prioritised. Furthermore, an internal audit of industrial relations identified that GAC is not auditing its contractors and subcontractors as required by its policies and procedures. GAC needs to ensure its contractors are auditing their own contractors and extend their audits to their subcontractors.

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 again encouraged to prioritise this initiative.

Social Management

Social policies, plans and procedures have been developed and approved by management and awareness and training for the social team is underway. The core documents for social management within OESMS are the Stakeholder Engagement Plan (SEP) including the external communications and grievance mechanism, the Land Acquisition, Compensation and Resettlement Framework (LACRF) and the Community Investment Strategy (CIS).

The Community Relations (CR), responsible for Social Management, including stakeholder engagement, resettlement, livelihood restoration and compensation, and influx management, reports to the newly appointed Director of Community, CSR and Environment. This new structure is seen as positive change that will allow better integration and coordination between the CR, Environment, Biodiversity, Communications and Corporate Social

Responsibility teams, specifically to address aspects related to community health, natural resource management and cultural heritage. The function of Security continues to be managed by the Security Manager, under the COO.

Stakeholder Engagement:

The Stakeholder Engagement function at GAC is comprised of two main units – Community Relations and Social Investment. Utilising the Borealis system, all engagement activities, community grievances, and external communications are recorded and monitored. The Community Relations unit, encompassing 14 direct full-time positions and 30 contractor positions, divided in five areas: Land Acquisition and Compensation, Resettlement, Grievance Management, Livelihood and Migration Influx and Stakeholder Engagement. The Social Investment unit, managed by a Social Investment Manager, coordinates programs in line with the Community Investment Strategy (CIS). A position that was vacant and supposed to be filled by a female team member has been eliminated from the organisational structure or transferred to a contractor position. It should be reinstated and covered with a female team member as originally planned and GAC should consider prioritising hiring women for all new CR positions and for any position available through turnover in the team, including community relays. Adding women with experience in community relations, ideally in their area of influence, would help to reduce the current extensive gender gap in the CR team and strengthen social management.

The stakeholder mapping is updated regularly to prioritise and tailor the type and frequency of engagement with each stakeholder group. The zoning of communities also continues to be updated to facilitate and make engagement with communities more efficient, focusing on those with higher impact or risk.

In 2023 the CR department recorded 1,574 communications with local stakeholders focusing mostly on Land Access (24%), Resettlement (15%), Compensation (14%) and Livelihood Restoration (8%), the rest of the communications were regarding a variety of topics such as safety, social support, local employment, influx and environment among others. Through these communications close to 20,000 people (30% women) were engaged.

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, and as part of the Community Gender Strategy, GAC conducted an awareness campaign in August, reaching 449 male and female community members in 11 communities to promote girls' education. Women participation in community engagement and social programs undertaken by the CR team has been steadily improving but women are still underrepresented with 30% participation.

However, a gender gap persists in the CR team, with only one woman, impacting the effectiveness of gender-related programs. The recommendation is to prioritize hiring women to bridge this gap. In terms of Community Grievances, the mechanism is yielding positive results, with an increased number of grievances in 2023, emphasizing the importance of the mechanism in conflict prevention.

Grievances and Conflict Management:

The community grievance mechanism continues to be implemented with positive results. Since March 2023, 78 community grievances were received related to land access (46%, up from 22% in Q1), resettlement (25% down from 36%), Compensation (9%), local employment (5%), Safety (4%), livelihood restoration (2%), and environment (2%). At the time of the site visit, the average time to resolve grievances was 20 days, and there were four that were yet to be closed.

In 2023 there was one community-imposed blockage at plateau 26 related to community compensation. The issue was recorded in January and was quickly resolved by the community development team with no significant consequences for GAC or the community members.

Social Investment:

GAC's 2019-2023 Social Investment Strategy (CIS) involved contributions of 0.5% of its revenues to the Local Economic Development Fund (*Fonds de Développement Economique Local* – FODEL) as established by Guinean legislation, a five-year Social Investment Agreement with the IFC (IFCSIA), and discretionary initiatives. In May GAC made the fourth annual contribution to FODEL, however, the funds remain frozen by the government. Completed initiatives under the IFCSIA and discretionary projects focused on improving the livelihoods and economic development of 26 villages, benefited 571 people (74% women) during 2023. The projects included fish smoking, market gardens, fruit production, sewing, soap production, community nurseries and the mechanical training school. In 2023 support for the latter six initiatives were finalized and the projects were fully transferred to their beneficiaries. The mechanic school will continue to be supported by GAC. The first graduation ceremony for two groups took place on November 2023, recognizing the successful completion of the program of 48 participants (10 women). The third class is composed of 25 students, 11 of which are women.

In addition to the above initiatives, GAC, in partnership with other private organizations help establish a “Digital House” in Béli Kindy, made an emergency donation of food, clothes and school materials to the Tanènè orphanage, and conducted a communication campaign explaining the negative consequences of early marriage for girls, in 13 villages.

The new 5-year CSR strategy (2024-2028) focuses on gender and climate change by supporting enrolment and attendance of girls in school, reduce the maternal and infant mortality rate, and develop agriculture projects at a commercial level. The CIS and in particular the development of agriculture projects needs to be carefully analysed to ensure sustainability and protection of natural resources important for ecosystem services and for biodiversity, considering the reduction in available land from mining activities in the region. The first phase of the strategy for 2024 will be on identifying specific projects to be implemented in the following four years.

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. The community map classifying villages by level of risk developed in early 2023 to facilitate both stakeholder engagement and health and safety risk management was updated in September.

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. During the review period, GAC completed the upgrading of a 10 km community road between Béli Kindy and Popmpo Missidé improving road safety by providing a safer alternative to the mining roads used by communities and facilitating access to local resources and encouraging economic development in the affected villages. GAC are also planning to build a new metal bridge over the Tinguilinta river to facilitate access to the national road for the community of Sinthourou Thiouladji. The bridge will reduce risk of accidents in the road to the dam and related to river crossing.

Previously it was reported that GAC had also initiated the construction of fences along the railway in the concession area near the processing facility to help prevent accidents in coordinating with CBG and CFB. Most of the work during 2023 was conducted east of GAC’s concession. In 2024, the work will continue towards Kamsar, and the CR team has initiated a series of awareness campaigns on rail safety in villages along the railway facilities. In 2023, GAC conducted a safety campaign in 17 schools of communities along the railway reaching 1,344 children (48% girls). Topics covered in the campaign included dangers of the railway, safe behaviour near railway tracks, basic knowledge of railway signals, safely crossing railway tracks, proper use of level crossings, and importance of reporting dangerous situations. Post-campaign surveys showed a significant increase in students’ knowledge about railway safety.

GAC commissioned a consultant specialized in fishing impact studies, to conduct a study of the use of GAC’s transshipment by fishers and identify measures to avoid incidents that may affect fishers. The study was completed in Q2 2023 and the results were shared the port authority, local authorities, fishers and fishmongers in September. Based on the study, the following recommendations were made by stakeholders: (i) create posters to disseminate the information from the study, (ii) undertake safety awareness campaigns in other ports, fishing camps and landing areas, (iii) require lifejackets prior to boarding fishing or transportation boats, and (iv) the maritime authority to purchase a fast boat to rescue fishers at sea. In the next visit, the IESC will follow-up on the implement of the recommendations.

The Environmental and the CR teams conduct monthly meetings and communicate as needed to coordinate and align community natural resource management across the project area. Collaboration has been focusing the Community Based Natural Resource Management (CBNRM) pilot project in the Thiouladjiwol valley and more recently on the development and rollout a CBNRM programme for the concession based on a landscape approach. In the Thiouladjiwol valley power project, GAC have been engaging with three communities to implement beekeeping, small ruminants, and community garden projects. The projects are expected to be transferred to the three participating communities in early 2024. Although the proposed projects are expected to improve community production and economic development through the sustainable use of natural resources, there has been no in-depth analysis of their effects in conservation of the area’s biodiversity and ecosystem services.

Influx Management:

GAC continues to implement its 5-year Project Induced Influx Management Strategy (PIIMS) 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.

As per the PIIMS, in 2023 GAC provided training at the commune level in Sangarédi and Tanènè for communal committees to improve management of migration flows with the participation of 22 and 18 people (7 and 5 women) respectively. At the village level, GAC provided training to 30 established village migration management committees in Kamsar, Sangarédi and Tanènè where 15, 242 and 254 people participated, including a total of 159 woman. GAC also supported 10 villages to develop land use plans and is in the process of finalising socio-demographic studies of 75 villages in the concession area.

Studies conducted by GAC in 2020 and 2022 indicated that the population in nine priority villages of the area of influence of the mine increased 93% from 2015 to 2020 and that the main reasons for migrating to the area can be directly or indirectly attributed to the increase of activities in the mining industry. GAC should update this information through additional surveys and develop a new PIIMS for the next five years also considering and informing the CBNRM and landscape management approach under development.

Security:

GAC informed that the security risk continues to be rated as medium, and there has been no significant change. Security arrangements have not been modified and GAC continues to work with the private security contractor Laguires who provides over 450 unarmed guards. Public security forces are assigned by the army, police and gendarmerie for the protection of GAC's facilities and are operating as per the Memorandum of Understandings in place.

During the 2023 were two blockage of GAC's operations carried out by community members, one was related to and working conditions of a GAC subcontractor, the other involved blocking the railway and road due to a dispute between the community with other company operating in Kamsar. There was no need for the involvement of GAC's security forces in the resolution of the blockages, which were quickly resolved the same day.

There has been an increase on theft and theft attempts reported by GAC, most with only minor consequences. One of such incidents, however involved a violent theft-related intrusion within the operations the subcontractor GPC's operation area where 4 Laguires security guards and one GPC worker suffered cuts and bruises. Witnesses also mentioned gunshots from the intruders, but this was not confirmed. An analysis of the incident recommended to have mix patrol teams with military and private security in the area, reinforce mine security, improve lighting within the premisses of workshops and conduct community briefings.

Land Acquisition, Compensation and Resettlement:

GAC have updated the Land Acquisition Compensation and Resettlement Framework (LACRF) with three new 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" to minimise impacts to good quality agricultural land,
- b) the "Post Resettlement Action Plan Amendments and Accelerated Compensation Payment Procedure" to expedite the acquisition and compensation process for small mining extensions (under 20 ha.), and
- c) the "Cumulative Community Displacement Prevention and Mitigation Management Procedure" to minimise the risk of affecting people more than once.

These procedures are now under implementation, but the updated LACRF needs formal management approval.

In addition to the above changes to the LACRF and considering the decreasing availability of land for agriculture due to mining activities in the region and population growth through in-migration, GAC is in the process of developing a strategic CBNRM at the landscape level to set aside areas for agriculture, ecosystem services conservation and mining activities. The ToR for the CBNRM procedure is under revision to incorporate comments provided by the IESC after the January site visit. The approach should be considered in the LACRF but centered 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 approach, including those related to mine rehabilitation, influx management, land acquisition, livelihood restoration, biodiversity management, community health and safety, among others.

GAC continue implementing three RAPs for physical displacement of 176, 94 and 43 households respectively from Béli Kindy to Hakoundé Thiandi (now also known as Béli Kindy), from Daprass to Filima and in the village of Sinthiourou Thiouladji uphill from its original location to avoid the risk of flooding from potential dam failure. The completion audits for the two latter RAPs and for the RAP for the dam on the Thiouladjiwol river and the water pipeline have been completed. The audits found that the resettlement process was mostly adequate allowing for affected people to maintain or improve their quality of life. Gaps with the objectives of the RAPs and recommendations to close them were identified. Key recommendations provided include:

- (i) strengthen servicing factors of the resettlement site, in particular the water systems,
- (ii) finalize legal and administrative support for households to obtain land titles,
- (iii) improve electricity system for the school and health care facilities,
- (iv) continue building organisational capacity to manage community resources,
- (v) work with the government institutions support securing agricultural and livestock activities,
- (vi) work with the government institutions to support waste management, and
- (vii) establish programmes to reduce vulnerability of households who have not been able to adequate and sustainably restore their livelihoods.

The most important gap identified in the implementation of the Filima RAP was the delay on the construction of the artisanal centre. GAC expect to complete the construction in Q1 2024. GAC needs to develop an action plan to implement the recommendations of the completion audits. This will include the development of a registry of gaps, objectives, current condition, required actions, actions implemented and results. As GAC continue to work with the communities addressing the gaps identified in the completion audits, it will also continue to implement social development programs through its CIS. It is important to make a clear distinction between actions to mitigate impacts of the resettlement process and corporate social responsibility initiatives in order to close the RAPs and initiate a new type of relation with the resettled communities.

In March 2023 GAC reported that they had completed the design and started the construction of the 6.5-km community access road for Sinthourou Thiouladji. In January 2024 GAC reported that they will instead build a metal bridge over the Tinguilinta River to provide easier pedestrian access to the national route as requested by the community. According to GAC, they are finalizing the topographic studies and expect to finalize the construction of the bridge in June 2024.

In accordance with Livelihood Restoration Plans, in 2023 GAC implemented the following livelihood restoration programs: (a) support for entrepreneurship, (b) support to improve agricultural production, (c) relocation of farming activities, (d) revenue generating activities program, (e) monitoring of 12 EIGs, (f) rice production project, and (g) establishment of a palm grove. GAC engaged a consultant to assess all livelihood restoration programs. Each program was assessed based on its effectiveness to provide income and restore livelihoods, its sustainability over time and its contribution to gender equality. Recommendations to improve livelihood restoration programs include reinforce training on governance for participants, improve monitoring and assessment of productivity, and provide emergency support when needed, among others.

Compensation for loss of assets is underway for the sites of drilling and sampling in the north of the concession, and the extension of plateaus 20 and 26. It is expected that all compensation for these losses will be completed by May 2024. Of a total of 429 PAPs that have lost agricultural land, 412 have found replacement land and have been fully compensated as they have completed the land preparation (14 during the reporting period). Community compensation for 16 villages is underway through projects such as sewing centres in Guidaly and Thiouwaye, water wells in Guidaly and Bingal, renovating of the primary school in Tantoulmani, community garden in Thiouwae and a small ruminants breeding project in Thowae.

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, three cultural heritage sites were identified and are being managed in consultation with communities.



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