



Guinea Alumina Corporation Conakry, Republic of Guinea

GAC PROJECT

IESC Monitoring Report: Fourth Monitoring - Remote Audit June 2020

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ABBREVIATIONS AND ACRONYMS

AfDB	African Development Bank
BEN	Bauxite Environmental Network
BMEP	Biodiversity Monitoring and Evaluation Plan
BMP	Biodiversity Management Plan
CAGF	FODEL Management Support Commette (Comite d'Appui à la Gestion de FODEL)
CASSM	Company for Security Support of Mining Companies (Compagnie d' Appui à la Sécurité des Sociétés Minières),
CBG	Compagnie des Bauxites de Guinée,
CBNRM	Community-Based Natural Resources Management
CE	Critically Endangered (on IUCN Red List)
CEO	Chief Executive Officer
CEFAD	Centre for Training and Development Support
CFP	Centre for Professional Training (Boké)
CHA	Critical Habitat Assessment
CIS	Community Investment Strategy
CLO	Community Liaison Officer
CMIS	Mobile Intervention and Security Company (Compagnie Mobile d'Intervention et de Sécurité)
COVID-19	Coronavirus Disease 2019
CPSES	Prefectural Committee for Environmental and Social Monitoring (Comité Préfectoral de Suivi Environnemental et Social)
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
ENAE-Koba	National School of Agriculture and Livestock of Koba (École Nationale d' Agriculture et d'Élevage – Koba)
EPC	Engineering, Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESMP	Environmental and Social Management Plans
ESHS	Environmental, Social, Health & Safety
FODEL	Local Economic Development Fund (Fonds de Développement Economique Local)
FOOS	First Ore On Ship
GAC	Guinea Alumina Corporation SA
GCM	General Control Measures (in BMP)
GIIP	Good International Industry Practice
GIS	Geographic Information System
GBV	Gender Based Violence
HC	Human Capital
HR	Human Resources
H&S	Health & Safety
HSE	Health, Safety and Environment

IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IUCN	International Union for Conservation of Nature
IWMP	Integrated water management plan
KBA	Key Biodiversity Area
KCT	Kamsar Container Terminal
KPI	Key Performance Indicators
LACRF	Land Acquisition, Compensation and Resettlement Framework
LTI	Lost Time Injuries
MIGA	Multilateral Investment Guarantee Agency
MoU	Memorandum of understanding
NGO	Non-Governmental Organisation
NG	Net Gain
NNL	No Net Loss
OGPR	Office Guinéen des Parcs et Réserves
OHS	Occupational health and Safety
OS	Operational Safeguard
PAP	Project Affected People
PCBS	Pre-Clearance Biodiversity Surveys
PIIM	Project Induced In-Migration
PS	Performance Standard
QRF	Quick Reaction Force
RAP	Resettlement Action Plan
RO	Reverse Osmosis
SCM	Species-specific Control Measures (in BMP)
SEIA	Social and Environmental Impact Assessment
SEP	Stakeholder Engagement Plan
SHE	Safety, Health, Environment
SHEC	Safety, Health, Environment, and Community
SMP	Security Management Plan
SMS	Social Management System
SNAPE	National Water Service (Service National des Points d'Eau de Guinée)
SOP	Standard Operating Procedure
SPV	Special purpose vehicle
SSC	Species Survival Commission
SSG	Species Specialist Group
SYDEV	Synergies and Development (NGO)
TBC	The Biodiversity Consultancy
ToR	Terms of Reference
TPI	Technology Partners International
UCOMB	Unité de Coopération pour l'Offset Moyen Bafing
UNDP	United Nations Development Programme
USTG	Union of Workers of Guinea ' <i>Union Syndicale des Travailleurs de Guinée</i> '
WCF	Wild Chimpanzee Foundation
WHO	World Health Organization
WWTP	Wastewater Treatment Plant

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 ESHS monitoring throughout the construction and operation phases of the Project, to verify whether Project plans and procedures and Lenders' environmental and social requirements (including International Finance Corporation (IFC)) Performance Standards; applicable IFC Environmental, Health and Safety (EHS) Guidelines, African Development Bank (AfDB) safeguards policy), are properly implemented at field level during the ongoing activities

The Project includes the mining of bauxite within GAC's concession in the Boké province of Guinea, the operation of a port terminal with an offshore export berthing facility at Kamsar, and railway spurs connecting the bauxite mine and the port terminal to the existing railway system. The Project entered the start of Operations on the 30th July 2019, and is now essentially fully operational with all aspects commissioned, and, other than a limited snagging and support team, all construction contractors have been demobilised.

This report presents the IESC's findings from the fourth monitoring event post financial close. Due to the Covid-19 situation, this monitoring event was undertaken remotely through a series of interviews using Microsoft Teams involving the GAC team (almost exclusively based on the Project in Guinea), and the IESC and Lenders based in their representative base offices, in Africa, Europe, and Canada. The interviews were conducted between the 1st June and 4th June 2020, with a wrap-up session on Friday 5th June 2020. The lack of the site visit was partially offset through the use of a series of drone films shot across the main Project elements.

The IESC's remote monitoring event allowed a detailed review of the status of GAC's management team, published documents, and review of previous actions, and IESC considered that the GAC's team was open and supportive of the process. The remote nature of the audit also meant that additional Lenders experts could attend specific workstream discussions that would not be feasible on a field visit. The remote nature of the audit did not however allow visual verification of the performance of GAC, or the ability of the IESC to identify potential new areas for discussion and assessment which are relevant to GAC's compliance with Lender requirements and where the IESC might provide suggestions to GAC for further improvements to their ESHS performance. It also put constraints on any direct engagement with affected communities and other stakeholders. Overall, the IESC considers the remote audit was a success but would stress the need to undertake a detailed site visit, if feasible, for the future fifth monitoring audit.

SHEC¹ Management

The HSE and Community Relations Management structure remains in essence the same (noting some changes to titles) as for the last IESC visit (October 2019). The Health, Safety & Environment (HSE) Director has overall responsibility and it is understood that he still has four main reports, namely the H&S Superintendent Port, H&S Superintendent Mine, Chief Medical Officer (covering all operational areas), and Environmental Manager. GAC has also increased its medical capacities in response to the Covid-19 threats and kitted out new areas to deal with any cases of Covid-19 (GAC has not reported any cases). GAC's General Director is also the Stakeholder Engagement Director and has direct responsibility over all aspects of social management (See Social Section below).

Following the last IESC visit the new Biodiversity Specialist resigned shortly afterwards and the position remained unfilled for six months. The Biodiversity Team also lost the Biodiversity Superintendent – both positions are now filled again, and the new staff are getting up to speed. The need for further capacity is likely. The rest of the EHS team remains essentially unchanged but has seven vacancies at the Monitoring and Compliance Officer and Technician levels. Stakeholder Engagement Department continues to operate on four strategic axes: Communication with Stakeholders, Mitigation of Operational Impacts on Communities, Grievance Management, and Local Economic Development. The department is structured under six functional units: Relocation and Compensation, Social Investment, Community Complaints, Community Relations, Communication, and Compliance. At the time of the remote monitoring there was one vacant position in the Stakeholder Engagement structure.

The Environmental, Health and Safety Management System (EHSMS) has evolved further since the last audit is considered to meet Good International Industry Practice (GIIP), with the environmental component of the system

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).

considered to be aligned with ISO 14001, and identifies the main risks and impacts. There are operational plans available although some are still being prepared, and some of those published are out of date, as are some of the procedures and other documents (e.g. Standard Operating Procedures (SOPs) and Work Instructions (WIs)). The EHSMS is reported to be interfaced with DTP's (the mining contractor) and VIVO's (fuel contractor) management systems. Based on the discussion held, the IESC is reassured that the management system is progressing and will ultimately be fit for purpose but is considered to be progressing very slowly given the Project has now been in operations since June 2019, and it should have been in place at that date, and so is a year behind schedule. Based on the discussions held, the finalisation of this system does not present a significant EHS risk to the Project given the EHS team has remained consistent from construction through to operations. However, there is a need now to drive the finalisation of the ESMS forwards and roll it out formally.

The Stakeholder Engagement Plan (SEP), the Land Acquisition, Compensation and Resettlement Framework (LACRF) and the Community Investment Strategy (CIS), are the core of community management and are aligned with the HSEC policy. All three documents are currently under revision. Procedures to implement each component are currently in place but may need to be adjusted to align with the new versions. The structure of the stakeholder engagement functions needs to be integrated in a Social Management System (SMS) for operations to ensure consistent implementation, evaluation, and continuous improvement. The SMS should be integrated to the EHSMS with clear linkages between both systems. GAC has focused its efforts on improving the social information management system and has committed to retain an international consultant to support the development of the SMS.

Environment

The senior environment team has remained consistent since the last audit and it was apparent from the interviews that there continued to be a solid appreciation of the environmental matters at the Project. However, it is noted that the team lacks junior team members which are essential both for the delivery of the monitoring and data management and also to protect the team from the impact of any departures in the future.

The environment team are actively using the Borealis data base to track performance GAC's has reportedly purchased the laboratory equipment needed to replace the laboratory previously run by the contractor Technology Partners Limited International (TPI), however this is not yet up and running and field monitoring equipment has still not been acquired. As a result, GAC is not undertaking the regular recording for parameters such as dust, noise, vibration, or surface water levels. This should be rectified in the next few months, but is considered to reflect a lack of focus on the need to have all the monitoring systems on place ready for the departure of TPI when their contract came to an end in June 2019. The IESC also has a concern that once the equipment arrives the vacancies in the environment team at the officer and technician levels will lead to a delay in the ability of GAC to roll out its monitoring programme and close this data gap as soon as feasible. The current absence of monitoring means that GAC cannot defend itself or provide data to communities in response to complaints about, for example, noise & vibration, and dust, and assess whether there have been impacts from the Project.

While the Project is now in operations, the resource efficiency management remains largely focused on tracking a few significant parameters such as monthly fuel and water usage, and based on this monthly GHG emissions are calculated and presented on the environmental score card to senior management. GHG emissions from the Project are reported have increased from 2,270 t CO_{2eq} in February to 3,000 t CO_{2eq} in April 2020, however this is considered to be an under representation of the GHG emissions from the Project, and it is inferred that this does not include significant emission sources such as those associated with the rail transport. A detailed review of this data is required and any systematic monthly under reporting corrections back-tracked to FOOS. The Project should undertake more granular tracking of GHG emissions by area and key performance indicators (KPIs) on resource efficiency such as fuel use per tonne of product exported. As detailed in the last IESC visit the tracking and checking of fuel usage by the different divisions and balancing this with the fuel supplied through the VIVO fuel system, should be part of the Waste and Resources Supervisor's role under the Environment Manager. As previously observed, GAC will need to ensure there is sufficient granularity in the data collected to evaluate where improvements can be made and have a system with suitable cross-references to assess accuracy. Out of this resource efficiency effort further KPIs can be developed.

Water use through the 2019-2020 dry season was supplied entirely by the water from the dam and there was no requirement to abstract from the Tinguilinta. Water use was highest in March 2020 at 43,247 m³ (April was slightly less at 42,119 m³). There have been some complaints from the communities about dust on their crops which, while they were reportedly closed within 30 days, indicated a weakness in dust control by water trucks. To address concerns from communities (adjacent to the haul road to plateau 20), designated community observers provide feedback on visual dust emissions, and the scheduling of water trucks.

The lack of environmental monitoring equipment means that water flux data from the rivers in the Project are not being collected. As discussed in the previous IESC report, this monitoring data will inform and refine the IWMP assumptions, and provides data to the Project to assist the environment team assess the interaction of various parameters (e.g. rainfall and turbidity), inform management actions and decisions, as well as identify short and longer term trends which may affect the Project (e.g. changing rainfall patterns).

A number of the actions raised during the IESC's first and second monitoring visits have been closed, and there has been progress on others which remain open, the IESC's main concerns with the remaining open actions, is the lack of closure in a timely manner (such as the installation of redesigned culverts to allow the drainage of the creek adjacent to the Platform). Following this IESC monitoring visit there are a number of new remedial actions as detailed in this report, which in general, are considered to be straightforward to implement, and the IESC will review the remedial actions during the next monitoring visit.

GAC report that the new waste management facility's incinerator has broken, and spare parts are taking time to deliver. To manage the wastes and minimise the build-up of wastes awaiting incineration, GAC has instigated the use of a SmartAsh Cyclonic Barrel Burner to dispose of paper and cardboard. The intermediate waste management facility at the Platform has been partially installed and is awaiting the delivery of the incinerator and once in place this will reduce the volumes of materials being transported from the Platform to the Tinguilinta waste management facility.

The findings from the last audit in relation to HSE issues associated with the Tinguilinta camp generator area appear to have started to be addressed, with the area now having a separate designated HSE inspection rather than being rolled into the one for the whole camp. The issues in this generator area around unsealed areas for the storage of hazardous materials, holes in the bund etc. appear to have been addressed based on discussions with GAC and the IESC's review of the actions raised in Borealis.

Health and Safety

GAC has continued to manage the Health & Safety (H&S) to the same high level as previously observed and to present the monthly Safety Performance Review in the Green Book (report for January 2020 provided in the data room) which includes H&S highlights themes and initiatives from the month. The Green Book is the monthly report to senior EGA management on the performance of the project, of which ESHS matters are a part. Based on the last E&S Quarterly Performance Monitoring Report (March 2020) there were 2,344,000 hours worked which were lost time injury free over the period, there were 3 medical treatment injuries, 11 first aid cases for the period and only nine cases of malaria reported for the period resulting in 27 lost days. Health and Safety campaigns for Q1 2020 included Covid-19 protocols, personal hygiene, Ramadan preparedness, wet season preparation, and mobile equipment safety.

A Compagnie des Bauxites de Guinée (CBG) train taking empty wagons from the Port to Tinguilinta derailed damaging seven GAC wagons however there were no reported injuries. During the period between the last and current IESC audits, there was one fatality and two injuries to contractors which were associated with a sub-contractor's truck crash that occurred on the 1st May 2020. This was reported to the Lenders and IESC, but was not recorded as a fatality or Lost Time Injuries (LTI) by GAC as GAC considers that according to OSHA reporting requirements it was not reportable as it was on an "uncontrolled road", and the contractor was undertaking a delivery and not formally linked to the works .

Biodiversity

Lenders will be aware of the significant number of Non-Conformances on this project related to PS6 requirements, a number of which have been ongoing for several years and continue to be unresolved. From this remote review, there are three new PS6-only Non-Conformances for Biodiversity/Ecosystem Services, therefore now thirteen PS6-related PS6 Non-Conformances are Open; three of which are considered High and nine are Medium; three PS6-relevant Non-Conformances have been open for all four IESC reviews to date; and two relate to multiple PS's. Plus, four High priority ESAP issues still remain from the Due Diligence. Lenders should be cognisant of the potential risks associated with the ongoing broad-scale Non-Conformance situation. This is especially the case as this has been a remote review of GAC's current performance, coupled with the lack of continuity in systematic implementation of biodiversity management/monitoring measures resulting from repeated senior staff turnover. The IESC flags that the level of Non-Conformances observed on this project should indicate to Lenders the need for an urgent reassessment and prioritisation of PS6 requirements at GAC's senior management level.

Biodiversity Team staff and implications of staff turnover:

From a Biodiversity Team perspective, GAC's ability to implement the required Lender-approved biodiversity program is dependent on having sufficient capacity, capability, and resilience within the biodiversity team. As highlighted in previous IESC reports, the retention of senior biodiversity staff has been an ongoing challenge for

GAC. At the time of the Oct 2019 site visit, the senior position of Biodiversity Specialist had been vacant for six months, and a new incumbent had just joined the company; however, that person resigned shortly after the site visit. The position then remained vacant for a further six months until April this year – the IESC had recommended that specialist technical consultants be deployed, but this option was not adopted. A new member of staff joined the company as Biodiversity Specialist on 1st April 2020. This incumbent has been working remotely so far (due to COVID-19 restrictions), and GAC anticipate his arrival at site within a matter of weeks (i.e. July 2020). In early 2020 the GAC biodiversity team also lost the long-term incumbent from the Biodiversity Superintendent role, with this staff member taking up the Field Manager role at GAC's Moyen Bafing offset program. The Biodiversity Supervisor from the last IESC visit, a suitably qualified Guinean national, remains in the team. A new incumbent has now filled the Biodiversity Superintendent role, and is also a suitably qualified Guinean national, which assists in ensuring the team is not overly reliant on international experts. During this time, the Environment Manager and Environment Supervisor have provided some oversight, however without an operational Biodiversity Team, implementation of the biodiversity management and monitoring programs has not progressed sufficiently, resulting in the large number of Non-Conformances in the Issues Table.

Overall, momentum and adequate implementation of GAC's biodiversity program continues to be affected by staff turnover. With the existing workload, the backlog of activities, and the current need for two staff members to get up to speed on site, a review is required to assess current skill gaps, capacity building needs, and staff retention issues, then resources increased accordingly to make the team more resilient to account for the type of staff turnover experienced.

Biodiversity Management Program (BMP):

Biodiversity is now included in the developing Operational EMS Aspects Register and a number of Biodiversity Procedures are in Draft form – the IESC is available to review these as Lenders see necessary (IFC have confirmed need for IESC review).

A status update is provided in Table 6.1 against all Biodiversity Management Plan (BMP) general control measures, although not all information requested was available at time of writing. The majority of measures are marked as status 'Orange' i.e. at risk of being delayed/attention required. In Section 6.2.2.2, the IESC summarise a number of the BMP species-specific control measures that are not yet being implemented at the mine or the port site. Regular and systematic implementation of the BMP activities, and insufficient demonstration of program progress to Lenders, has meant this has been an area of ongoing Non-Conformance.

The Land Disturbance Management Procedure is now finalised, and via remote review, appears to be working well. GAC presented instances of incidents where permit conditions were not adhered to, but that were then picked up within the system. It appears that disturbance permit applications that have the potential to affect priority biodiversity features are being challenged by the Environment Team where necessary.

There has been limited revegetation/rehabilitation during the last six months. The plan for 2020 is to rehabilitate eight borrow pits (22 Ha). Separate EMS Rehabilitation Management and Monitoring Procedures are being drafted as part of the EMS. A centralised nursery is now operational managed by the Community Team, and the 2021 intention is to develop commercial community-based nurseries, with a transfer of skills from the central nursery. As the Community team will have responsibility for the centralised and community nurseries, GAC needs to ensure that the ecological commitments to rehabilitation and restoration are adhered to and demonstrated. For example, that areas are not rehabilitated primarily with commercial crops, that only indigenous species are used, that ecological value is maintained and enhanced. A key Lender concern would be the potential establishment of commercial nurseries exacerbating widespread cash-crop expansion, in a landscape already threatened by unrestricted conversion to cashew nut plantation.

Although requested, there was no update available on the Bauxite Environmental Network (BEN) and how GAC are managing cumulative biodiversity impacts at the port. The IESC flag the ongoing slow progress in implementing measures at the port marine environment as a Non-Conformance Action. The Critical Habitat Assessment identified the Atlantic Humpback Dolphin as requiring Net Gain. A number of marine species of conservation concern were deemed to require No Net Loss (NNL); several could have been categorised CH-qualifying had there been sufficient data available to assess their status. There is currently no indication of how GAC intends to achieve NNL and Net Gain for these species and there is currently no evidence of a marine ecology monitoring program being implemented. If GAC are not able to commence implementation of marine monitoring through BEN, they should consider proceeding with GAC-only surveys, following appropriate consultation with marine species experts.

No update was available on strategic haul and access road network planning; GAC noted they would be able to provide a full update at the next IESC review – this should be prioritised for full discussion. There are several PS6-relevant aspects to be considered, including opening up new areas not previously accessible by vehicle, wildlife collision, bush-meat extraction, firewood harvesting, habitat fragmentation, edge effects, and undue disturbance of

core preferred habitats. As it is not clear how these are being managed, the IESC recommend GAC consider how best to mitigate these impacts, including the incorporation of suitable wildlife corridors and safe crossings/underpasses/overpasses as appropriate.

Biodiversity monitoring and evaluation program (BMEP):

A number of EMS Biodiversity Monitoring Procedures are being developed, and these should align with the monitoring activities detailed within the BMEP already developed.

Regarding surveys or studies actually undertaken, GAC advised that due to biodiversity staffing challenges, the biodiversity monitoring program had still not been implemented. In Section 6.2.2.3, the IESC summarise a number of the BMEP monitoring activities related to freshwater ecology, birds, amphibians, reptiles, mammals, flora and habitats (e.g. data collections, analyses, collaborations) that have not been implemented to date, at either the mine or port sites. Without the effective implementation of a robust monitoring program, the Project is not in compliance with PS6, including specifically Para 17: GAC are not currently able to demonstrate that measurable adverse impacts on biodiversity values (or the ecological processes supporting those values) are not occurring – there may be unknown adverse impacts not being detected. These issues are retained as Non-Conformances in the Issues Table.

GAC advised that the peer review had been undertaken of the 2018/2019 chimpanzee survey report by technical consultants TBC, and that their recommendations were to be incorporated into the EMS Biodiversity Monitoring: Terrestrial Procedure under development. IESC/Lenders should be provided with detailed feedback from the peer-review, to better understand the reviewer's technical opinion on the adequacy of the chimpanzee survey approach, methodology, results and analyses, and whether any re-analysis is warranted.

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

GAC should develop metrics to calculate updated biodiversity loss/gain figures, at both impacted (mine and port) and offset (Moyen Bafing and mangrove restoration) sites. GAC had retendered for external contractor support to develop a methodology to assess habitat 'condition' and area affected, plus undertake an assessment of land use/condition change between the 2017 baseline and 2020. Proposals are currently being assessed and Lender/IESC feedback will be sought. GAC should reassess originally predicted residual impacts with actual loss numbers and refine targets for required biodiversity gain at both the mine and port offset programs. That GAC are still unable to determine condition scores and use informed loss/gain metrics to demonstrate Net Gain and No Net Loss is a key Lender risk and PS6 compliance gap – see new Non-Compliance Action.

Regarding the onsite set-aside, previous IESC reports have noted GAC's intention to establish a set-aside at Boulléré, an internationally recognised Key Biodiversity Area (KBA), that straddles the boundary between GAC and CBG concessions. Oct 2019 site visit discussions indicated a potential expansion of the set-aside area linking from Boulléré westwards across the northern concession to the forests north-west of the reservoir. During this review, GAC stated the current focus for set-aside is around the reservoir area in the Tiouladiwol valley. The IESC recommend that set-aside planning is prioritised, as progress for onsite protection is a key priority for Lenders and no clear proposal has yet been made. The IESC flag that the choice of onsite set-aside area should be guided by its ecological values, ability to deliver biodiversity gain for No Net Loss features, and feasibility of long-term protection.

Regarding the Moyen Bafing offset, UCOMB provided an updated on their administrative functions, operational structure, reporting and budget mechanisms. Little information was available on activities on the ground. Travel restrictions have hampered the UCOMB Team's access to site. The 2020 Action Plan has not yet been approved, but a COVID-19 plan of action has been developed. A proposal for governance of Moyen Bafing National Park has been developed by Wild Chimpanzee Foundation and is being review by UCOMB. Note: RINA's contract for monitoring the offset program is ready to be signed once clarifications have been received from GAC. The intention for 2020 is to progress with a desktop review during Q3 once contracts are finalised.

Regarding the mangrove habitat restoration offset, the external review has not progressed in the timeframe as expected due to protracted contractual discussions and restrictions on travel to site. A desktop review will be performed by the team from University of the Sunshine Coast instead and is due to be completed by the end of July. There have been significant delays and challenges in achieving successful mangrove restoration to date, and thus delivery of sufficient 'gains' to contribute to the overall Net Gain of functioning mangrove habitat. The IESC acknowledges the ongoing efforts of the Environment Manager to keep the overall offset program on track. Nevertheless, the IESC reiterates its previous recommendation that a strategic rethink of the mangrove offset program is required, and strongly advise the external desktop review to be targeted to help deliver this. GAC's requirement to develop appropriate metrics for loss/gain calculations is equally valid for biodiversity losses at the

port, as well as updating previous predicted-loss calculations with actual-loss data. The Non-Conformance Action is retained.

Invasive Alien Species:

GAC advised there had been no invasive species management at the mine site since the previous IESC site visit, and it was not clear the extent of management at the port site. Field inspections are now re-starting with the new Biodiversity Team almost in place. The IESC again recommend the Plan be reviewed and refreshed to Rev.1 if necessary, to ensure current operational risks are addressed and that weed/pest management guidelines are adequate. As GAC are not able to demonstrate effective implementation of an invasive species program, the Non-Conformance is retained and escalated.

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

GAC Environment Teams advise that monthly meetings are now being held with the Communities Team and the Mining Team and are working well. The IESC's understanding at the last site visit was that GAC were to commence a more strategic consideration of cross-cutting topics such as ecosystem services and CBNRM at a steering committee level ('SteerCo'), to help align work priorities across multi-departmental programs. However, during this June 2020 remote review, GAC advised this was not the case, and that they were instead implementing a site-based program with the resettlement community at Sinthiourou Thiouladji, downstream of the dam.

Mitigation measures to protect prioritised ecosystem services were included in GAC's 2017 Ecosystem Services Assessment. The SYDEV program had built on these measures, and these programs produced a number of recommendations. A GAC gap analysis was undertaken in early 2019, and almost half of the gaps required implementation of an ongoing CBNRM program. A strategically planned CBNRM program would help GAC achieve the necessary ecosystem and biodiversity Lender requirements, building on the earlier SYDEV work. The IESC reiterate that Lenders have repeatedly expressed concern related to the significant risks to ecological values across the concession, resulting from large-scale land-use change and habitat conversion to commercial crops/cashews. Without carefully planned community engagement, natural resource management, strategic road planning and access restrictions, continued habitat conversion seems highly probable, and GAC's restoration efforts will likely be compromised. Lenders/IESC will closely monitor GAC's next steps in relation to how the CBNRM program is expanded pro-actively across the concession, and it is recommended that GAC maintain dialogue with Lenders/IESC in the short term as a suitable program is developed, expanded and enhanced. The Non-Conformance is retained.

Supply chain

No update was available from GAC on the verification of its primary suppliers or contractor supplier practices – this is now escalated to a Non-Conformance Action, as the IESC is unable to determine whether GAC's supply chain is PS6 compliant

Labour Management

GAC subscribes to the main International Labour Organisation (ILO) conventions, which are also adopted by Guinean Labour Code (2014). The company's Human Resources (HR) policy is reflected in a comprehensive Internal Regulations document that guides labour relations and includes recruitment and hiring; social services and benefits; work regulations and disciplinary actions; health, safety and security; work termination; conflict management and resolution, and working conditions in general. The Internal Regulations was revised in July 2019 in consultation and with the participation of the workers' union.

Labour and working conditions are managed by an adequate team under the new Director of Human Capital (HC), who reports to the Chief Executive Officer (CEO). The team is comprised by 14 staff divided in four areas: Learning and Development, Recruitment and Onboarding, Business Partners, and Payroll and Administration. In addition, the Compliance team supports the management of workers' grievances.

In June 2020, the project had 2,314 employees, including contracted workforce (1,692 employees, which is less than in April 2019). In the last six months, the number of GAC direct employees has slightly increased from 407 to 419. The percentage of Guinean nationals employed by GAC directly increased from approximately 80% to 82%. Of the 1,747 contractor workers, 1,670 (95% of the total employees) are Guinean nationals. The number of direct employees and contractor workers is expected be stable for the operational phase, but the proportion of Guinean nationals is expected to continue increasing.

The percentage of female direct employees has slightly increased over the last six months from around 11 to 12%, but is still under the 15% achieved on November 2018. The contractors' female workforce remains at approximately 8%, showing the need to increase effort to fully implement the gender strategy.

GAC continues to meet formally with union representatives every three months and on a regular basis to address day-to-day issues, such as clarifications of benefits and overtime payments, resolution of workers grievances, etc. The union leader confirmed that good relationship with management has been re-established in the last year and that wages were adjusted based on the remuneration study conducted by GAC. After GAC experienced 11 stoppages during the first six months of 2019, there have been no worker-led stoppages since June 2019.

Turnover has been reduced from close to 10% in 2019 to less than 4% in 2020 by increasing the participation of Guinean nationals in managerial and supervisory positions and long-term employment incentives. However, retaining and attracting highly qualified personnel has proven to be difficult with several positions in the HSE and Biodiversity teams vacant and with high turnover.

GAC has implemented a plan to reduce risk of Covid-19 contagion and address any case, doubling its medical staff and upgraded its medical facilities. Non-production employees are working from home or alternative locations; the rest of the employees are divided in two zones with strict protocols. All workers are required to practice social distancing, constant hand washing and disinfection of tools. Prior to returning to work from rotations all employees must quarantine for 14 days. There have been no Covid-19 cases among GAC workers.

GAC reported having received six grievances so far this year through the compliance system, four of which are yet to be resolved. The IESC requested statistics and other information about grievances received by Human Capital, but at the time this report was written no additional information in this respect was provided. GAC needs to review its workers grievance mechanisms to ensure all workers grievances, regardless of the channel used by workers, are registered and consolidated in order to document and be able to analyse issues and trends to be in a better position for early detection and correction of possible issue.

From the start of the project, over 8,570 workers had been demobilised by May 2020. As expected, demobilisation has slowed down from more than 2,500 workers demobilised in 2019 to 883 in the first five months of 2020. GAC continues to successfully implement its demobilisation strategy. With only a small number of workers finalising commissioning, demobilisation is now not considered a significant risk.

Social Management

Social management is organized in four strategic axes: Communication with Stakeholders, Mitigation of Operational Impacts on Communities, Grievance Management, and Local Economic Development. The Stakeholder Engagement department is structured in six functional units: Relocation and Compensation, Social Investment, Community Complaints, Community Relations, Communication and Compliance, under the supervision of the Community Manager, who reports to the General Director and Stakeholder Engagement Director. Currently, the Stakeholder Engagement department has a total of 26 staff with one position for a Livelihood Restoration Supervisor vacant since the previous supervision mission. In addition, 24 people are hired on a contract basis, including the Social Investment Manager, 13 representatives in the communities, and 10 consultants supporting resettlement and compensation. All the Stakeholder Engagement staff and contracted personnel, with the exception of the Social Investment Manager and the General Superintendent for Resettlement and Compensation, are Guinean Nationals.

While FOOS was reached in June 2019 and GAC has been in operations for a year, the Social Management System (SMS) is still being developed. The SMS needs to be finalized and implemented as soon as possible. The Stakeholder Engagement Plan (SEP), the Land Acquisition, Compensation and Resettlement Framework (LACRF), and the Community Investment Strategy (CIS), are the core of community management. All three documents are currently under revision. Procedures to implement each component are currently in place but may need to be adjusted to align with the new versions. As these documents are updated and integrated into the SMS training will need to be provided to the entire team to ensure they are implemented adequately.

During remote monitoring meetings, GAC informed that an Engagement Strategy has been developed with the objectives of identifying key stakeholders affected and/or able to influence the company and its operations, identify methods to disseminate information and ensure adequate consultation building mutually beneficial relations with stakeholders. Stakeholders were identified and geographical areas where stakeholders may be affected by GAC's operations were divided into four categories based on the stakeholders' potential exposure to risks and impacts.

In compliance with the Guinean health system and the World Health Organization guidelines, GAC has adjusted its strategy and methods for community relations, given the Covid-19 pandemic. Since March, GAC has been relying more on community relays, telephone communication with community leadership and authorities and using social media and public radio.

From November 2019 to April 2020, GAC reported 427 interactions with stakeholders, that is approximately 30% more than in the preceding six-month period. The percentage of interactions where the community team considered the general atmosphere to be negative is slightly higher at 6% compared to 4% in the previous six months. Based on an analysis of the interactions, including grievances, the main social risk is associated with dust management,

followed by PAPs returning to the land that has been taken and compensated for by GAC and safety of fishers in the area of operations.

Monitoring should be used to determine if dust generated by the project is negatively affecting biodiversity, community health and the yields of their crops. Besides optimising the dust suppression techniques to avoid impact, GAC needs to monitor sensitive community areas that may be affected by dust and inform the monitoring results to community members and if agricultural production is impacted by GAC's operations, compensation will need to be provided to affected people.

GAC continues to engage with fishers and is implement measures to create awareness for fishers' safety in seven artisanal ports. GAC has acquiring 500 Personal Flotation Devices (PFD) to be distributed among fishers; however, distribution of the PFDs has been put on hold due to Covid-19.

Between November 2019 and May 2020, 10 grievances were recorded, compared with 56 between May and October 2019, and 27 in the previous six months. The distribution of grievances by topic remained relatively steady with about one third of the complaints related to compensation issues, one third to land access, and the remaining related to community development, economic impact, and environmental issues. The average time for grievance resolutions was reduced to approximately 13 days from 72 days the previous period. From November 2019 to May 2020 GAC reported seven blockages by the communities which were directly related to GAC operations, all were resolved within a few hours.

Social investment programs are divided in three themes: Economic Development, Health, and Education. Some of the social investment programs and budget has been redirected due to Covid-19. GAC has donated medical equipment worth over US\$200,000 to support Guinea's health services response and is implementing an income generating program working with community women to produce soap and facemasks, which are then bought by GAC and donated to the surrounding. All projects are gender inclusive with four of them focusing specifically on women development.

With the start of production, the first payment of US\$500,000 to the Local Economic Development Fund (*Fonds de Développement Economique Local* - FODEL) was made by GAC in March 2020. GAC is working with other mining companies to establish rules for accountability in the fund management.

To address safety of communities, GAC has a traffic management plan and is controlling the community access routes and crossing of the haul roads through stationing personnel at the crossings. During the next IESC monitoring visit, this will be reviewed as well as the outcomes of a proposed study by a task force set up to undertake a detailed assessment of the community access routes for better control. GAC informed that water safety awareness and training has been provided to local communities who use areas by the dam for palm oil production and fishing. GAC indicated guards are posted at the river crossing, who help avoid the use of the pipeline to cross the river.

From November 2019 to April 2020, 129 explosions were set off by GAC in plateaus 20 to 26, close to three times the number of explosions set the previous 6 months period. GAC has in place control measures for before, during and after blasting. Some community members have raised concerns with blasting, from annoyance from limiting their ability to work on their agricultural lands to cracks on their houses. GAC needs to monitor noise and vibrations and develop a strategy to address community concerns related to impact of vibrations from blasting to their houses, however as noted in the environmental discussion GAC is missing the monitoring equipment to undertake this monitoring. Once it is available, monitoring equipment should be placed in the communities as soon as possible.

GAC's influx management plan focuses on two areas: a) influx management on GAC's concession through direct actions in collaboration with stakeholders in specific locations, and b) influx management at the regional level through the facilitation of the development of a sustainable development strategy for the prefecture of Boké. At the local level, GAC has been working with 10 priority communities supported the establishment of multi-stakeholder influx committees, facilitated the use of buffer zones for agriculture, pastoral and other livelihood activities, and raised awareness influx effects in local communities. GAC is now in the process of expanding the program to all 50 communities in its area of influence. Demographic studies of these villages are underway and expected to be concluded in Q3 2020.

The main security risks directly related to GAC's operations were related to demobilisation of local workers, but as the construction phase is almost completed this risk has diminished considerably. The number of security guards provided by the security contractor was reduced from 560 in October 2019 to 504 in May 2020. GAC has finalized revisions to the SMP, which is now in place and considered adequate. The MoU and protocol for engagement of public security forces with the Ministry of Mines is mostly adequate, and is being revised to clarify and strengthen alignment with GAC security policies. Although the revised MoU has not been signed, GAC engages with the public security detailing its human rights policies and expectations should the public security forces needed to act to protect GAC's assets, personnel, and operations. Four armed public security guards are stationed at the explosives' magazine, and agents of the National Police are deployed at the access points of the Kamsar facilities.

GAC has completed most resettlement commitments in Béli Kindy and Filima. However, there have been issues in both communities related to the quality of house construction, and an inadequate drainage system and water supply. GAC is in the process of repairing and improving the water drainage system in both communities in coordination with the National Water Service (Service National des Points d'Eau de Guinée – SNAPE). Extensive repairs need to be done to houses at both sites due to technical construction faults and the use of inadequate materials. This issue is being addressed with the contractor that built the houses. Once the houses are repaired GAC needs to complete an assessment to ensure all house construction issues have been addressed. When all mitigation measures have been substantially completed, GAC will need to conduct a completion audit as per the LACRF. In addition, GAC needs to conduct an assessment of the issues found in both communities and apply lessons learned to future contracts to avoid similar problems in future resettlement processes, including the one being currently conducted in Sinthiourou Thiouladji.

After failing to implement the RAP to restore the livelihood of displaced artisans from Dapress, GAC continues to analyse alternatives to support the re-establishment of workshops and restore the livelihoods of artisans. Considering that the issue has been pending since 2018, the IESC's recommendation to develop and implement a plan to support the resettlement of the artisans and ensure that their livelihoods have been restored has been updated to high priority.

The implementation of the RAP in Sinthiourou Thiouladji is now underway with the construction of 33 houses that are expected to be completed in August. GAC will start the construction of the remaining 8 houses once the first phase is completed and the parcels are available. The second phase of the relocation is expected to be completed in April 2021. According to interviews conducted by GAC community members are generally satisfied with the resettlement process. The interviews were conducted by GAC at the request of the IESC and the Lenders *in lieu* of direct interviews that could not be conducted due to travel restrictions associated with Covid-19. Results will be verified during the next IESC site visit. Their main concern relates to accessing the community from the national route. The route for the access road for the community is yet to be determined. The design of the road will need to consider potential social and environmental impacts, including avoiding access to critical habitat and biodiversity sensitive areas.

GAC informed that compensation payment for affected crops and assets has been paid to all individual and communities in the port and the concession areas. Accordingly, community projects have been completed in nine affected villages. The agricultural land of 287 people has been affected by construction and operations activities in the concession area. Of these 99 have been fully compensated as they have completed the land preparation in replacement land, and an additional 109 have been compensated for 70% of their land and have identified replacement land and are preparing this for agricultural use. 71 PAPs have identified replacement land but have not started the preparation of the land, and the remaining eight PAPs, from the most recent resettlement in Sinthiourou Thiouladji, are still in search of replacement land.

According to interviews conducted by GAC, people economically displaced from plateau 20 north were generally satisfied with the compensation process. In their opinion, consultation and communication could be improved. Their main concerns/issues were delays on the payment of compensation (now resolved), and support to find replacement land.

The LACRF requires compensation for community assets to be provided in community projects rather than cash. GAC received instructions from the Minister of Mines to deposit the funds in the accounts of the affected communities (sub-prefectures) at the Central Bank of Guinea in accordance with local legislation. This restrains GAC from exercising any level of control over the funds or how they are used, bridging the Lenders' requirements to ensure compensation is transparent and applied consistently so that the standards of living of those affected are improved or at least re-established to pre-project levels. GAC needs to develop a strategy to ensure that affected people are consulted on the way compensation will be applied and to monitor and evaluate compensation projects and programmes throughout their implementation. Prior to the implementation of any changes to the LACRF, the Lenders will have to review and approve the document.

Livelihood restoration programmes continue to be implemented in accordance with the RAPs. GAC informed that the livelihood restoration program for PAPs in Sinthiourou Thiouladji will be developed and implemented after the first phase of the resettlement is completed. Even though economic displacement of the PAPs is not expected to be significant as they will continue to have access to most of their existing farms, it is recommended that GAC initiates the implementation of the livelihood restoration program as soon as possible to reduce the transition period.

Cultural management and chance find training for direct and contractor workers continues to be provided. GAC provided geolocated information on the identified cultural heritage sites in plateaus 20 and 26, where DTP's operations are located, has been provided to the mining contractor. Between November 2019 and April 2020, GAC visited cultural heritage sites and conducted consultation meetings with representatives of the villages of Béli Kindy and Tambafenda. Strategies for improving identification and management of cultural sites will continue to be discussed with village representatives.

ESAP STATUS TABLE (Update of Active Items on ESAP July 2020)

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment Nov 2019	IESC Update July 2020
PS1 Assessment and Management of Environmental and Social Risks and Impacts – Management System									
M0004/17	4	D1.6.1; 1.6.3;	<p>The Emergency Prevention and Response Plan (EPRP) is limited in its extent and is largely inward looking other than the cross reference to security plans. The EPRP should include details on the main components and consideration of the different risks in construction and operation.</p> <p>The EPRP does not include any requirement for, or details on how to, interface with community authorities. To meet Lenders standards, measures to support communities in responding to an emergency are necessary.</p>	<p>Refine EPRP and define project facilities and emergency situations to be addressed, incorporating Lender guidelines.</p> <p>Define potential situations having impacts, and extent of communities and individuals subject to potential impacts. Consult communities so that their views and concerns are incorporated in the plan.</p> <p>Assess the capabilities of communities, government agencies and related parties to respond to emergencies at the mine and port, and identify what active community/local authority role(s) in preparing for and responding to emergencies associated with the project are necessary. Identify notification, communication, and support measures to include local authorities in the plan.</p>	Before Financial Close	Revised EPRP		<p>In Progress</p> <p>The IESC considers that there remains work to do but this is as expected as the project transitions from construction to operations - specific areas to be reviewed on the next monitoring visit include assessment of the updated EPRP and the extent to which it covers the dam and also operations (such as the fuel transfer and spill response planning) and addresses the current lack of discussion of the interface with the communities within the EPRP.</p>	<p>The IESC considers that there has been limited progress on this aspect to close the remaining areas which include the interface with operations such as the fuel transfer and spill response planning. GAC should now have the documents available from the contractors to update the EPRP and reference the interaction between GAC and contractors' (VIVO and DTP) EPRP.</p>
Assessment and Management of Environmental and Social Risks and Impacts – Stakeholder Requirements									
PS2 Labour and Working Conditions									
PS3 Resource Efficiency and Pollution Prevention									
R0002/17	14		<p>Water monitoring by GAC is limited to some aspects of water use, there is no detail water monitoring plan which is required for GAC to be able to monitor its water use, the natural water levels/flows, etc.</p>	<p>GAC to develop and implement a comprehensive water monitoring programme based on the key aspects of the IWMP and the water features (surface and groundwater) in the area. This should include selected headwaters around the plateaus. GAC should capture the monitoring data within an appropriate data bases to allow data interrogation, and assessment of temporal changes.</p>	Before Operations	Details Water Monitoring and Management Plan		<p>Water Monitoring and Management Plan – This remains under development. The new Environmental Superintendent understands the issues and is currently transferring all TPI data to Borealis and will be reviewing the current monitoring and assisting develop the future plans.</p> <p>It will require effort from GAC to establish a better monitoring network which is robust enough to withstand floods and provides information which can inform management decisions. Critically this should also tie in with freshwater ecological aspects of the BMP & BMEP given the presence of aquatic critical habitat species</p>	<p>While GAC has been held back implementing its monitoring program through the delays in the procurement of monitoring equipment, it should have reviewed and prepared a reactive monitoring plan which tied into the overall IWMP and its conclusions and recommendations. The water monitoring and management plan need to also tie in with freshwater ecological aspects of the BMP & BMEP given the presence of aquatic critical habitat species</p>

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment Nov 2019	IESC Update July 2020
R0005/17	17	D3.2.2	Air model impacts were assessed in SEIA Addendum based on generic assumptions regarding equipment and operations. This may not be reflective of the impacts likely to arise from the planned equipment and operations. The SEIA Addendum also includes the assumptions that humans have a medium sensitivity, and that 50% reductions in emissions can be achieved through water suppression or 95% through chemical dust suppression, and no justification of these assumptions is provided.	GAC to have the air model re-run once the equipment is confirmed and include an evaluation of whether the sensitivity of human receptors in the SEIA Addendum (set at medium) is correct, and provide justification for the assumptions on expected emission reductions used in the mitigation scenarios.	Prior to start of Operations	Air modelling report update/ addendum, and air quality monitoring and management plan		Air Modelling Report update/ addendum, and air quality monitoring and management plan - GAC report that the ToR has been produced and has been sent out for bidding. This Air Quality Model will be reviewed during the next monitoring visit in October 2019	Air Modelling Report update/ addendum, and air quality monitoring and management plan. This update has not yet been provided the IESC understands that GAC is working with ERM on this and the IESC plans to review this during the next monitoring visit
R0006/17	18	D3.2.4	The fuel handling on the GAC Port Platform appears to be designed to minimise spills and provides suitable containment and spill response capabilities. The final design and management plans will need to include detailed consideration of leak detection procedures and protection of the transfer pipelines (e.g. from accidents or fuel theft) to minimise the potential for releases and contamination of soils, groundwater and surface water (and therefore impact the mangroves and fisheries).	GAC to review fuel handling procedures and ensure that these contain specific procedures to minimise the risk of a release, such as the testing of transfer lines before use, and the monitoring of pressures during fuel transfers.	Prior to start of Operations	Detailed fuel handling procedure(s)		The detailed fuel handling procedure(s) from VIVO is a condition of their contract and has yet to be provided. IESC anticipates that this document will be available for review on next monitoring visit in October 2019. Assuming the documentation discussed has been prepared and rolled out this will be closed.	IESC understands this is agreed with VIVO. The IESC anticipates that this item will be formally closed on next monitoring visit assuming the documentation discussed has been prepared and rolled out, and should be linked to the EPRP
R0012/17	24	D3.2.12	The use of bio-solids for beneficial uses such as mine rehabilitation and agricultural land improvements are considered appropriate if done with management oversight to reduce risks. Although bio-solid volumes are likely to be limited, they will be substantial over the life of mine. They need to be classified appropriately and if deemed not to be hazardous then they should be disposed in a beneficial manner.	GAC will develop a suitable procedure within the waste management plan (WMP) to classify bio-solids waste, its handling (which will need to consider management through the wet season when drying will be limited), and safe disposal/use.	Before start of Operations	Incorporation of bio-solids in the WMP or appropriate procedure		An assessment of the WWTP at Tinguilinta has been prepared and immediate actions, and the remedial plan has been provided to GAC. The WWTP can be remediated and the process made efficient. GAC now needs to schedule the remedial actions and repair/rehabilitate the WWTP, and improve its efficiency, and enable bio-solids to be removed from the system. Management of bio-solids has been incorporated into the WMP v02, and GAC intends for bio-sludge to be solar-dried on flat bunded/bioremediation pad, and then added to composting material. IESC will review progress and	The Tinguilinta camp WWTP is has not been subject to testing to demonstrate that it is functioning correctly, however based on the reported visual inspections it is assumed to be functioning as planned. The new WWTP at the Platform is reported to be now receiving all sanitary wastewater from the camp. As per last visit the IESC understands GAC intends for bio-sludge at the Tinguilinta Camp to be solar-dried on flat bunded/ bioremediation pad. The process is for sludge to be gravity fed to the drying beds.

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			The project, and potentially the incinerator, will generate hazardous wastes and a disposal route will need to be established once a suitable volume has been generated to justify its transfer to a suitable disposal site.					GAC's proposed strategy on the next monitoring visit in October 2019.	Once in the drying beds, excess liquid will be drained through a gravel/sand bed with an underdrain connected to the buffer tank. The drained sludge is then left to dry in the sun. The 'end-product', or bio-solid, once dried will then be removed, and used as a soil improver. IESC will review progress on remediating the WWTP and GAC's proposed strategy on the next monitoring visit
PS4 Community Health Safety and Security									
C0004/17	30	D4.2.1	Guiding principles for hiring, training, equipping and monitoring security personnel for the mine and port areas and other facilities and operations, including Conakry office and transportation routes, are not defined and consolidated in a Security Management Plan.	GAC will develop a Security Management Plan for the concession, port, and other GAC facilities aligned with IFC PS4 and the VPSHR and based on a security risk assessment. The plan should include Guiding Principles, Code of Conduct security personnel, rules of engagement, vetting process for security personnel, procedure for investigation of incidents involving security personnel, and reference to the memorandum of understanding (MoU) with the GoG on the Provision of Security services	Before Financial Close	Security Management Plan	GAC - Security management plan.pdf	ADEQUATE The draft security management plan is completed and adequate. The plan. A Memorandum of Understanding (MoU) with the Ministry of National Defence through which a military attaché was appointed to liaise with the company is in place and being implemented. In addition, GAC engages with public security forces to inform of its security and human rights policies and expectations when public security forces are required. Final, management approved version of the Security Management Plan is required.	CLOSED The final and management approved plan was provided to the IESC in July 2020 as evidence of its incorporation into GAC's operations. The MoU and protocol for engagement of public security forces is in place and revised as necessary to ensure alignment with GAC security policies, including the protection of human rights.
		4.2.2							
		4.2.3							
		4.2.4							
		4.1.1							
PS5 Land Acquisition and Involuntary Resettlement									
PS6 Biodiversity Conservation and Sustainable Natural Resource Management									
B0009/17	40	D6.2.5A	GACs advisors (WCF/TBC) have recommended a permanent on-site set-aside. In addition to potentially offering refuge for chimpanzees, this will provide protection for Restricted Range species, and potentially the Temminck's Red Colobus.	<i>GAC to provide details of on-site set-aside once forthcoming chimpanzee surveys by EEM are completed.</i> <i>Once initial design of the long-term chimpanzee monitoring program is completed, integrate this into the Project's BMEP (in accordance with the BMP).</i>	Before start of Operations	Chimpanzee survey analysis and on-site set-aside delivery plan.		This remain open until an acceptable proposal on the onsite set-aside is provided to Lenders. Chimpanzee survey analysis and on-site set-aside delivery plan – the 2018 surveys and analyses are now completed, and a final report received. GAC is to inform Lenders on their future monitoring program and put forward their proposal for an onsite set-aside(s).	A peer review of the 2018 chimpanzee surveys has been conducted, but Lenders/IESC have not seen the review. GAC has yet to propose their plan for set-asides on the concession; This remain open until an acceptable proposal on the onsite set-aside is provided to Lenders

Ref	ESAP ID	ESDD Source	ESDD Issue /Topic	Required Action	Timeframe	Deliverable	Documents Provided	GAC Status / Comment Nov 2019	IESC Update July 2020
B0010/17	41	D6.2.6	GAC is undertaking a biodiversity offset program for the purposes of achieving net gain for Critical Habitat at the port terminal site. A mangrove restoration program at two selected sites in the Taïgbé and Taïdy Islands commenced in June 2015, to compensate for the loss of mangrove habitat related to the rail/platform/jetty footprint. Mangrove restoration efforts at Taïgbé were recently lost due to storm surge	GPS-SARL to provide a monitoring and evaluation plan which provides clarity on progress of the program and details indicators which GAC can use to demonstrate and measure progress towards net gain.	By start of Operations	Monitoring and Evaluation Plan	Rapport d'achèvement projet mangrove Kamsar VF.pdf	This remains open until an acceptable offset program is provided to Lenders. The program needs to be designed and implemented according to good offset practice, able to be monitored/evaluated to deliver the required biodiversity gain expected from functioning mangrove habitat. The Mangrove Rehabilitation Project was not as successful as anticipated, GAC has completed their internal review and should seek external specialist technical guidance. An external review of the program was originally proposed but did not occur. A monitoring and evaluation plan was not developed. The mangrove offset program will continue to be reviewed during future monitoring visits.	GAC's external review of the program to date has been delayed due to protracted contractual negotiations and COVID-19 travel restrictions. GAC decided that a desktop review would suffice until a site visit can be undertaken later in the year. This remains open until an acceptable offset program is provided to Lenders. The program needs to be designed and implemented according to good offset practice, able to be monitored/evaluated to deliver the required biodiversity gain expected from functioning mangrove habitat
			The scope of works for the offset includes the requirement for an independent critical assessment review of the first 2 years of offset, to assess progress against objectives and requirements.	Undertake the planned independent critical assessment review of the first 2 years of offset, to assess progress against objectives and requirements.		Critical assessment review			
				Following construction, GAC to provide an updated assessment of loss (mangrove footprint) for offset purposes		Updated Conservation Loss Footprint			
B0013/17	44	D6.3.1	It is noted that almost all EcoS residual impacts are deemed to be of minor significance following implementation of ESIA and additional mitigation measures. This is considered over-optimistic, especially considering the extent of PIIM anticipated, and significantly escalating land conversion already observed.	GAC to review the level of residual significance allocated to assessed priority EcoS impacts	By start of Operations	Revised EcoS Assessment		GAC considered that the residual impacts on ecosystem services are being mitigated through the project with SYDEV. Specific actions in SYDEV reports have not yet been tied back to specific mitigation measures, to determine completeness or that residual impact significance levels are correct.	GAC considered that the residual impacts on ecosystem services were being mitigated through the project with SYDEV. However, the project was discontinued and specific actions in SYDEV reports have not been fully implemented. An April 2019 gap analysis (of how EcoS mitigation measures were/were not being implemented) relied quite heavily on a working CBNRM program being in place – see ID-45
B0014/17	45	D6.3.1	It is unclear how priority EcoS issues are being managed overall, and who holds responsibility for ensuring that various individual measures to address EcoS impacts, when combined, are sufficient.	GAC to include EcoS as an issue requiring multi-function oversight within the new Integrated Business Planning (IBP) team. This will include ensuring organisational role linkages between Biodiversity team and Communities team, and that teams discuss priority EcoS management/monitoring regularly.	By start of Operations	IBP EcoS Oversight Plan		Remains open until development of GAC's CBNRM program. The SYDEV program looks good and appears to be making progress in the right direction in the small number of locations it is being implemented. However, internally that the community-based natural resource management program and alignment between the Environment/Biodiversity and Community teams does not yet feel settled within GAC. Successful implementation of mitigation measures to address impacts on priority EcoS will need ongoing collaboration. The IESC will	The SYDEV program set the basis to manage community-based natural resource management and ecosystem services. However, the program was discontinued. Some isolated actions are being implemented, but a strategic, integrated approach with the participation of communities is necessary to manage impacts on priority ecosystem services Program alignment between the Environment, Biodiversity, and Community teams does not yet feel settled within GAC, – this continues to be an area for

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								follow-up on this during future monitoring visits.	improvement. Remains open until development of GAC's wider CBNRM program
PS8 Cultural Heritage									