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CBG BAUXITE MINE ENVIRONMENTAL AND SOCIAL MONITORING REPORT – NOVEMBER 2023

Ramboll
Hartham Park
Hartham Lane
Corsham
Wiltshire
SN13 0RP
United Kingdom
www.ramboll.co.uk

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

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 Made by **N Laurent, P Piot, C Lissandrello, A Fitchet, V Saille**
 Checked by **N Laurent**
 Approved by **C Halliwell**

Checked by:	N Laurent
Approved by:	C Halliwell

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

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Appendix 1

Site Visit itinerary

Appendix 2

Issues closed in this Monitoring Visit

Appendix 3

Status of ESAP items (as of February 2024)

ACRONYMS AND ABBREVIATIONS

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

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

Acronym	Meaning
PMP	Probably Maximum Precipitation
PRAMS	Income Generating Activities Programme
PS	Performance Standard
PWDs	Persons With Disabilities
RAP	Resettlement Action Plan
REB	Réseau Environnement Bauxite (The Bauxite Environment Network)
RfPs	Requests for Proposals
SEP	Stakeholder Engagement Plan
SMB	Société Minière de Boké
SMPs	Social Management Plans
SNAPE	National Water Supply Point Management Services
SOP	Standard Operating Procedure
SO ₂	sulphur dioxide
ToR	Terms of Reference
VSV	Virtual Site Visit
WBG	World Bank Group
WMF	Waste Management Facility
WMP	Water Management Plan
WWTP	Wastewater Treatment Plant

EXECUTIVE SUMMARY

Background information

Ramboll UK Limited ('Ramboll') was commissioned in September 2016 by Compagnie des Bauxites de Guinée ('CBG') to undertake environmental and social (E&S) monitoring of the 18.5 million tons per annum Mine Expansion Project (the 'Expansion Project') in Guinea.

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

The IESC's scope of work allows for two in-country monitoring visits each year during the construction of the Phase 1 Expansion Project and/or during the construction of the Sangarédi to Kamsar Railway Upgrade Project associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes the monitoring of health, safety, environmental and social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG's Health, Safety, Environment, Communities and Quality (HSECQ) Department and are managed under the same E&S management system. This report provides the findings of an in-country site visit undertaken from the 27th November to the 1st December 2023 (referred to as the November 2023 site visit in this report).

A series of inspections, meetings and interviews were undertaken during the week commencing 27th November 2023. The meetings/interviews were held in person and involved representatives from the IESC, CBG, CBG contractors, stakeholders and the Policy Lenders. Following the site visit, Ramboll organised a day and a half of online meetings on 18th December 2023 to discuss the progress made in the implementation of specific Management Plans. The findings from the site visit and the online meetings are reflected in this report.

During the site visit and subsequent online meetings, the following topics were of primary focus:

- HSE&S:
 - The adequacy of the HSE&S Management System(s) and related plans;
 - The implementation of the suite of E&S management plans and procedures intended to address applicable Project Standards, notably the IFC Performance Standards on Environmental and Social Sustainability (2012);
 - Follow-up on those 'open' issues identified during previous site visits;
 - Contractor management;
 - Environmental management (air, water, waste, hazardous materials, noise and vibration);
 - The roles and responsibilities of stakeholders in the region;
 - Resource use and energy efficiency; and
 - North of Cogon (NoCo) and South of Cogon (SoCo) exploration.
- Labour and working conditions:
 - Workers' Grievance Mechanism;
 - Workers engaged by Third Parties;
 - Occupational Health and Safety.
- Stakeholder engagement:
 - Community Relations Team (staffing and resources);
 - Female participation in stakeholder engagement meetings;
 - Engagement with People with Disabilities (PWDs);

- Management of community grievances; and
- Management of community requests for assistance (doléances).
- Community health and safety:
 - Communicable disease prevention;
 - Community incidents;
 - Security;
 - Community health and safety at along the railway and active mining locations; and
 - Community development projects.
- Biodiversity:
 - Resourcing levels, organization and structure;
 - Inspection and land rehabilitation;
 - Biodiversity Action Plan (BAP) and Biodiversity Monitoring and Management Plan (BMMP); and
 - Integrated Landscape Management Plan (ILMP).
- Resettlement:
 - The implementation status of the Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP);
 - The implementation status of the Livelihood Restoration Plans (LRPs);
 - The feedback of the Communities of Guéguéré and Kagnaka on recent land acquisitions (Plateau Mbouroré and Plateau Kagnaka)
 - The update of the Resettlement Policy Framework;
 - The validation of LRPs;
 - The review of the compensation register
 - PS5-related grievances;
 - Resettlement implementation capacity.

This report aims to capture areas of progress, typically via the update of earlier findings.

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

Significant progress was being made in closing ESAP items, more specifically ESAP item #1, as its deadline (31st of January) was approaching, although not all ESAP #1 items will be closed on 31st of January 2023.

Furthermore, CBG is making progress on many fronts, albeit certain actions (as specified in various Action Plans) are behind schedule.

Update on the ongoing historical systemic issues

HSECQ reliance on other CBG Departments/decision-makers

The IESC has previously reported improved interactions on environmental and social topics between departments through the appointment of Champions and Sponsors which resulted in good progress with many issues that had historically been held up. Since July 2023, notable progress has been made in relation to the management of air quality (described later in this report).

Procurement Department

The IESC has previously identified a protracted procurement process as a key reason for the slow implementation of actions in the management plans, for example, when ordering new equipment/commissioning specialist consultant/external service providers. The slow procurement process is thought to have broad consequences across CBG's operations, and it was therefore the IESC's earlier recommendation that CBG undertakes a detailed review of CBG's procurement procedures to identify bottlenecks and/or inefficiencies responsible for delaying the procurement of goods and services. As reported previously, no specific actions have been taken to address the IESC's recommendation, and whereas there has been some apparent reduction in procurement delays, problems do persist and the IESC's earlier recommendation remains valid.

For instance, hold-ups in the procurement process are resulting in the ambient air quality monitoring station in Kamsar not collecting data for multiple months, and the request of 2 additional vehicles for the CR team made two years ago and has not yet been satisfied.

Organisational capacity and resourcing levels

Significant improvements have been made since the previous site visit in June 2023 on this point with the appointment of a Resettlement Expert (although the IESC recommended a Resettlement Manager) and an Environmental Monitoring Team Lead. However, the HSECQ Director role is still being temporarily filled by the head of the HSE department. In addition to these key people, several new appointments have been made since the previous site visit as described in section 4. Overall CBG's efforts to strengthen the team have paid off, resulting in stronger teams (with key roles being filled) and greater capacity resulting in improved HSE&S performance.

The IESC encourages CBG to continue to ensure employment/consultancy contracts are renewed in a timely manner/recruitment starts at the earliest opportunity to avoid prolong vacancies in the future.

Safety culture

Efforts to improve the safety culture and safety performance continue. The main improvement from the July 2023 site visit is the revision and implementation of the Contractor Management Plan (CMP). In addition, CBG recruited H&S professionals to strengthen the team. However, at a local level, continued improvement is required, particularly in internal inspection and audit, asset integrity and incident investigation and close out.

Resettlement

The IESC has previously reported delays/stalled actions relating to the management of resettlement, for example, Resettlement Policy Framework update¹, Hamdallaye security of tenure, cumulative impact, retrocession of rehabilitated land, monitoring, LRP validations², staffing of the Resettlement team). During the November site visit, the IESC noted significant improvements since the June 2023 site visit: The Land Acquisition and Resettlement are now incorporated into the CBG roadmap (with sponsors and champions selection undergoing), a 3-day workshop took place in Paris in December 2023 with the objective of addressing ongoing resettlement issues, the finalization of the Resettlement Policy Framework, agreement on Hamdallaye security of tenure and the hiring of a Monitoring & Evaluation Advisor in Q3 2023.

Revision of Environmental and Social Management plans

Status remains the same as reported in the June 2023 report with several environmental and other plans (security management plan, cultural heritage plan) being out of date and in need of revision. A previously

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

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

reported, update of plans is scheduled for 2024. Thus, the IESC's earlier comments remain valid; noting time and effort is required to update plans, CBG should prioritize those most in need of update.³

The Air Quality Management Plan (AQMP) is one of the plans to be updated. A specific action⁴ relating to the determination of stack emissions was intended to result in significant improvements to the ambient air quality (AAQ). However, a series of modelling studies revealed that addressing stack emissions in isolation would not result in a significant improvement in the AAQ. Consequently, a workshop was conducted in July 2023 in which CBG agreed, with lenders, to a more 'holistic' approach for improving AAQ. This approach involves consideration of all Kamsar point source and fugitive emissions and actions to reduce such emissions which are likely to result in much better improvements. A comprehensive action plan, spanning several years, has been agreed and will be integrated within a revised AQMP schedule for finalisation in mid-2024. Enhanced air quality monitoring and refinement of the air dispersion model are included in the corrective plan and will be used to verify the anticipated improvements to Kamsar air quality.

High significance findings

High significance findings have been identified that require immediate attention to mitigate their potential adverse impacts. Below we present a summarized report of these findings, segmented by the Performance Standards (PS) from which they derive. More details on each finding are provided in the related PS section of this report. Each finding in the report is assigned a unique code that reflects the month and year when it was initially identified, noting some of the findings below remain open from previous site visit report, providing insight into the duration it takes to close some of the open findings.

Assessment and Management of Environmental and Social Risks and Impacts (PS1)

- *Organizational Capacity and Competence* (Nov 2023_HS_001): The HSECQ Director role (unfilled since 2021) is being temporarily filled by the head of the HSE department. CBG needs to expedite recruitment for this crucial position to maintain effective operational management.
- *Grievance Management* (Nov 2023_SO_003 & Dec 2022_015): Analysis of the grievance register has revealed that a significant number of grievances are not resolved within the 50-day timeframe prescribed in the Grievance Management Mechanism, with a notable amount extending past 90 days. CBG must align its grievance resolution practices with the Grievance Management Mechanism to minimise frustration amongst those submitting grievances. Moreover, the persistence of open grievances from 2020 and 2021 indicates a pressing need for CBG to fortify the capacity of its HSECQ committee.
- *Stakeholder Engagement* (Dec 2022_013): CBG discloses its environmental monitoring methodology and has reportedly begun sharing the results with the communities. There is a high need for CBG to provide evidence of the distribution of environmental monitoring outcomes.
- *Environmental Management Plans* (Nov 2023_EN_005): CBG's Environmental Management Plans (EMPs) have not been updated since January 2019. Consequently, certain plans, for example the Waste Management Plan, do not reflect current CBG practices and/or outcomes from the Integrated Management System's roadmap. An urgent review and update of the EMPs are needed to ensure they are comprehensive and reflective of CBG's current activities.
- *Social Impact Assessment Issues* (Nov 2023_RE_003): The grievances and concerns raised by communities about land and living conditions question the efficacy of the plateau-by-plateau social impact assessments. CBG should review and update the assessment processes to ensure they

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

⁴ Action number 13 of the Environmental and Social Action Plan, as disclosed.

fully capture community concerns and include a comprehensive assessment when opening a new plateau.

Labour and Working Conditions (PS2) -

- *Health and Safety Risk Assessment at the Kamsar Plant (Nov 2023_HS_007)*: The risk assessment at the Kamsar plant, specifically at tower TA10 and similar facilities, is outdated. CBG should re-evaluate risks, monitor dust and noise levels, and update the Job Safety Analyses to define suitable personal protective equipment (PPE) and improve collective protection measures.
- *Working Conditions of the Train Drivers (Nov 2023_HS_002)*: The conditions of the train drivers need to be improved, including ensuring breaks during journeys and limiting journey times to a maximum of 12 hours. Moreover, thorough emergency drills should be conducted, including the development and testing of radio alert codes.
- *Train derailment (Nov 2023_HS_005)*: Following a major derailment incident, further to investigations already conducted, CBG is advised to perform an in-depth investigation of the train and wagons' conditions and include results from the latest railway inspection in the investigation report. A detailed examination of communication protocols between the railway workers and train drivers is also highlighted as a critical need.
- *Incident Investigations and Root Cause Analysis (June 2023_012)*: An action plan addressing all remaining issues related to the last railway fatality needs to be finalized, focusing on improving Health & Safety information exchange among workers, clarifying and testing new safety distances from the tracks, and enhancing communication between the Central Control Facility (CCF) and all personnel near the railway. This plan should be developed in collaboration with all parties involved on/near the railway.
- *Workers Engaged by Third Parties - camps (Nov 2023_SO_005 & June 2023_010)*: Worker Camp Conditions at the Tinguilinta camp show several non-compliances, particularly regarding overcrowding and lack of facilities. CBG is tasked with prioritizing improvements to align the camp conditions with best practices and international guidelines. More broadly, a rapid audit of working conditions, particularly concerning security guards and local contractors, is required to identify and address potential non-compliances and areas for improvement in labour and working conditions.
- *OHS System & Risk Management (Dec 2022_025 & March 2022_008)*: Lack of follow-up to the multiple action plan(s) may result in the reoccurrence of serious events. Efforts should be undertaken to discourage continued use of haul roads by communities, improve the working conditions of guards and drivers, and control the application of CBG rules by contractors. Moreover, weak control of OHS risks has been evident in numerous findings, such as blasting operations and traffic on the mine, demanding structured control systems, clear communication of risk registers, and development of baseline operational risk assessments.
- *Maintenance & Asset Management (March 2022_010)*: CBG's maintenance and equipment updating programs are progressing, albeit slowly, with notable advancements in the planned maintenance of the Dryers. A comprehensive review of maintenance practices and asset integrity must be performed.

Resource Efficiency and Pollution Prevention (PS3)

- *Drinking Water Quality at Cogon and Batafong (Nov 2023_EN_004)*: Aluminium levels in the water from Cogon and Batafong stations are exceed drinking water quality guidelines. If corrective actions applied in Cogon result in an improvement, the IESC suggests to apply them in Batafong.
- *Recalibration of the Hydro/Groundwater Balance Model (Nov 2023_EN_001)*: CBG's plans to recalibrate the Water Balance Model for Sangarédi are well behind schedule, delaying the

execution of mitigation strategies needed to ensure water availability for communities and ecosystems as mining expands. The recommendation is to prioritise recalibration of the model, such that it can be used to inform future actions that will reduce impacts to surface and groundwater resources.

- *Communities' Water Resources* (June 2023_016 & Dec 2022_032): The IESC recommends stronger coordination with SNAPE and the establishment of a communication protocol between CBG and SNAPE on water resource monitoring. In Fassaly Foutabhé, close coordination with SNAPE and the community for the investigation and improvements in water quality, including clear dissemination and recording of meeting minutes, are essential.
- *Surface Water Discharge - Kamsar* (Nov 2023_EN_014): High sediment content in Kamsar's 'Grand Canal' surface water and stormwater drainage system has the potential to adversely affect off site aquatic receptors. Regular dredging of the canal may not be sufficient; thus, an engineering solution, for example sediment traps, is recommended to adequately address suspended sediment concerns.

Community Health, Safety, and Security (PS4)

- *Community Health and Safety – Mine Site Safety* (Nov 2023_SO_010): The IESC recorded a fatal incident at the Sangarédi mine's sedimentation basin which was not reported in a timely and detailed manner to Lenders, pointing to a significant lapse in incident reporting and communication protocols. The recommendation is for CBG to establish thorough inspection programmes to regularly check the integrity of safety measures for all sedimentation basins and develop a robust incident reporting procedure. CBG has reported preparing an updated tracker for internal use which includes specific details on notification requirements, timeframes and internal reporting. However, this was not shared with the IESC and will be revisited on the next site visit.

Performance Standard 5 (PS5)

- *Management of Resettlement* (June 2023_029): Progress was made on the integration of Resettlement Management within the CBG roadmap for the purposes of tracking actions identified in various management plans. However, the sponsors and champions nomination is pending, to address these systemic issues in a tracked and accountable manner.
- *Hamdallaye Resettlement -Security of tenure* (June 2023_031): Hamdallaye's unsecured land tenure is preventing final acceptance and formal transfer to of responsibility for the land to local community. Thus, formalization of land tenure agreements is required to complete the resettlement process.
- *Livelihood Restoration Lacks Assessment* (June 2023_035): The lack of assessment to determine the status of livelihood restoration for the Hamdallaye and Fassaly Fouthabé PAPs is delaying closure of the programme. Interim support, such as food assistance, should be planned until revenue-generating Livelihood Restoration Programme activities are confirmed to have restored livelihoods.
- *Delays in LRPs* (June 2023_036): The delayed initiation of several LRPs (Kankalaré, Thiapikouré and Kagnaka) has adversely affected communities, suggesting a need for renewed interim support. Thus, renewed interim support (food assistance) is recommended until LRP activities yield revenue for the PAPs.
- *Lack of Procedure for Land Rehabilitation* (June 2023_042): Despite the Mine Rehabilitation and Conceptual Closure Plan (MRCCP), there is no formal procedure for retrocession of rehabilitated land involving the community. A procedure needs to be established immediately, incorporating best practice guidance described in the MRCCP.

- *Cumulative Impacts* (Dec 2022_047): the effects of cumulative impacts resulting from mining (opening of successive plateaus) and associated activities has not been assessed for several communities. At least, a land balance assessment must be prepared for villages listed as potentially affected by a physical resettlement by 2022 in the 2016 RPF, in coordination with the biodiversity team.
- *Fassaly Fouthabé Request for Resettlement* (Dec 2022_042): The community of Fassaly Fouthabé has formally requested resettlement due to the impacts of mining and hauling. CBG must assess the situation for its long-term cumulative impact and engage the community in deciding a response to the resettlement request.
- *Inefficient Livelihood Restoration Programs* (Dec 2022_043): In December 2022, the IESC observed the livelihood restoration activities at Hamdallaye and Fassaly Fouthabé were not meeting goals. Since this finding was opened, CBG has taken steps to address the issue, which will be closed once the new LRP implementer will start work.
- *Unstaffed School at Fassaly Fouthabé* (March 2022_032): A school constructed as per the RAP remains unstaffed, preventing its utilization. CBG should continue working with the local education authority and explore community-driven solutions to staff the school.
- *Resettlement Monitoring Framework* (Oct 2021_038): The preliminary monitoring framework developed by CBG does not align with the CRPF and LRPs and lacks outcome indicators. CBG should refine this system to distinguish progress from outcomes and invest in dedicated monitoring resources.

Performance Standard 6 (PS6)

- *Integrated Landscape Management Plan Finalization* (Nov_2023_BI_001): The Integrated Landscape Management Plan (ILMP) needs to be finalized and signed off by CBG. This finalization (and subsequent implementation) is essential for ensuring sustainability and biodiversity conservation within CBG's operational landscape, aligning with environmental and social governance standards.

Scope Limitations and Exceptions of the Assessment

The IESC has performed this monitoring audit in accordance with the scope of services outlined in its contract (CBG-5G-EXP1-019-G-S – Amendment No. 007-V1), signed in January 2023.

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

1. INTRODUCTION

Ramboll UK Limited ('Ramboll') was commissioned in September 2016 by Compagnie des Bauxites de Guinée ('CBG') to undertake environmental and social (E&S) monitoring of the 18.5 million tons per annum Mine Expansion Project (the 'Expansion Project') in Guinea.

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

The IESC's scope of work allows for two in-country monitoring visits each year during construction of the Phase 1 Expansion Project and/or during the subsequent Sangarédi to Kamsar railway upgrade project associated with the Multi-User Operators Agreement (MUOA). The scope of the visit includes the monitoring of health, safety, environmental and social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, all of which fall within the remit of the CBG Health, Safety, Environment, Communities and Quality (HSECQ) Department and are managed under the same E&S management system. This report provides the findings of the in-country monitoring visit undertaken in November 2023 and subsequent online meetings (on 13th and 14th December 2023). The monitoring visit included site inspections, meetings with CBG representatives, CBG's contractors and other stakeholders.

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

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

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

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

- Mining Department, including HR Manager at the mine; and
- CCF ("Centre de Contrôle Ferroviaire": railway control centre room).

A team of five from the IESC, accompanied by six IFC and two DFC personnel respectively, participated in the site visit meetings and inspections to assess CBG's HSE&S performance, including progress towards meeting the requirements of the Environmental and Social Action Plan (ESAP) (as amended in September 2021).

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

General:

- Status of the Phase 1 and Phase 2 Expansion and MUOA Projects;
- HSECQ structure and resourcing;
- Current short-term mine plans and proposed CBG exploration activities within the South Cogon Concession Area and North Cogon Concession Area.

HSE:

- Status of HSE Management Systems;
- H&S metrics, performance and training;
- Audit and inspection programme;
- Procedure for sharing the environmental monitoring results with the communities;
- Perceived environmental impacts by the communities;
- The roles and responsibilities of stakeholders in the region;
- Implementation of Management Plans, including those relating to: Air Quality, Noise and Vibration, Waste, Hazardous Materials, Resource Use and Efficiency, Water Quality, Environmental Monitoring, Contractor management; and
- Management of Change (MoC).

Social:

- Community Relations and Resettlement personnel resourcing and capacity development;
- Performance of the IsoMetrix software platform for managing environmental and social (including biodiversity) risks;
- Community health and safety (H&S), including communicable diseases, health infrastructure, rail-related and mine roads-related H&S issues, and incidents occurrences;
- The scope and focus of stakeholder engagement;
- Community grievance/doléance⁵ management;
- Community Development Plan;
- Betafence installation and communities' acceptance;
- Labour and working conditions and worker grievance management.

Resettlement:

- The implementation status of the Hamdallaye and Fassaly Foutabhé Resettlement Action Plan (RAP);
- The implementation status of the Livelihood Restoration Plans (LRPs);
- The feedback of the Communities of Guéguéré and Kagnaka on recent land acquisitions (Plateau Mbouroré and Plateau Kagnaka)
- The update of the Resettlement Policy Framework;
- The validation of LRPs;
- The review of the compensation register
- PS5-related grievances;

⁵ *Doléances* are community requests for assistance (such as improving a road, building a clinic, or providing a new well for water).

- Resettlement implementation capacity

Biodiversity:

- Resourcing levels, organization and structure;
- Inspection and land rehabilitation;
- Biodiversity Action Plan (BAP) and Biodiversity Monitoring and Management Plan (BMEP);
and
- Integrated Landscape Management Plan (ILMP).

Following the site visit, Ramboll organised a day and a half of online meetings on 13th and 14th December 2023 to discuss the progress made in the implementation of specific Management Plans. In addition, a 3-day workshop took place in Paris in December 2023 with the objective of addressing ongoing resettlement issues.

The site visit itinerary is provided in Appendix 1.

This report focuses on the findings arising from the site visit and the subsequent online meetings, however, it also refers to earlier findings, reflecting the ongoing nature of many ESAP deliverables and the IESC's continuing role in monitoring CBG's HSE&S performance.

2. SCOPE AND STRUCTURE OF THE REPORT

2.1 Scope

As a condition of the Common Terms Agreement (CTA), CBG is required to appoint an IESC to monitor (audit) and report on the implementation of the ESAP and compliance with the applicable IFC PSs and E&S commitments and, in doing so, present the E&S risks associated with the Expansion Project, the MUOA Project and CBG's wider operations. This report has been prepared for the attention of CBG and Lenders.

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

- A review of ESAP implementation;
- A review of certain HSECQ Management System documents, notably agreed management plans;
- Interviews held with key HSECQ staff within CBG;
- Interviews with CBG's contractors;
- Interviews with other CBG departments;
- Interviews with members of the authorities;
- Meetings with community members affected by the MUOA Project and CBG's broader activities.
- Meetings with NGOs working with CBG;
- Review of the latest environmental monitoring results provided by CBG;
- Review of recent Borrower's E&S Compliance Certificates for Q3 2023

2.2 Project Standards

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

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

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

2.3 Structure of the Report

Section 3 provides a very brief description of the Expansion Project status, the MUOA Project status and other CBG activities. Section 4 presents the recruitment and team composition updates at CBG. Section 5 describes how different levels of significance are attributed to issues highlighted in the report. The report is then structured around the seven IFC Performance Standards applicable to the Project, as listed above, and supporting WBG EHS Guidelines. The 'Open findings' tables, located at the end of each section of the IFC Performance Standard, list the key findings identified during the November 2023 site visit, the 'open' identified issues from previous site visit reports, and the IESC's recommendations to address these key findings. Findings remain 'open' if no/insufficient progress has been made, or the IESC did not have an opportunity to revisit the issue.

[Appendix 2](#) provides a status update for the consolidated list of 'closed' or 'superseded' issues during the November 2023 site visit and/or subsequent meetings. Explanations on the reason for closing the issues are given. Issues are typically categorised as superseded when an issue has evolved in such a way that the original issue is no longer relevant, or the issue has evolved and replaced by an updated finding. In this situation, if an issue is categorized as superseded on this site visit, an update of the issue is provided in the main body of this report, and the previous issue as listed in [Appendix 2](#), will include a reference to this updated text.

Within this report, the IESC has endeavoured to provide a balanced opinion, providing examples of good international industry practice. However, due to the compliance-focused nature of this report, the broad range of aspects covered, and large amounts of review documentation made available, and also for the sake of brevity, the report is predominantly focused on areas for improvement.

3. PROJECT STATUS

This chapter provides a brief description of the Expansion Project status, the MUOA Project and other CBG activities ongoing at the time of the site visit in November 2023.

3.1 Status of the Expansion Project

As reported previously, the construction/commissioning of the Expansion Project is complete.

3.2 Status of MUOA Project

During the previous site visit (June 2023), the overall progress of the MUOA Project was reported at 72%. Progress in end November 2023 was reported to be 77% complete (as of September 2023) with key tasks to be progressed, namely:

- Installation of permanent signalling and training - 76% complete with a scheduled end date (acceptance test) now in March 2024 (and reception of all equipment in Kamsar at the end of January 2024);
- Construction of the locomotive maintenance workshop (11% complete with a scheduled completion now for the end of 2025); and
- Delivery of 7 remaining reconditioned SD40 locomotives, under the Phase 1 scope, three locomotives were delivered to Kamsar in March 2023 and the remaining four will be delivered between February and June 2024 (89% complete).

Other notable developments include:

- Recruitment and internal training of new staff (88% and end date planned in December 2023)
- Purchase of track maintenance equipment (86% completion and end date planned in June 2024)

3.3 Upgrade of the train tracks

CBG is in the process of upgrading the railway infrastructure connecting Sangarédi to Kamsar. This project is being undertaken by the appointed contractor CRCC. During the site inspection conducted in November 2023, the accommodation facilities provided for CRCC personnel were observed. These facilities include the Tinguilinta and Boké camps. The Tinguilinta camp has a capacity to house 200 workers, whereas the Boké camp is equipped to accommodate up to 600 workers. At the time of the site visit, the Tinguilinta camp was occupied by approximately 30 workers, and the Boké camp had around 300 workers in residence.

3.4 Status of South of Cogon and North of Cogon activities

3.4.1 Current mining plan

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

Plateau	Status of LDP	Status of activity at the plateau
Ndangara et Koobi suite	Finalised	Stripping complete, all HSECQ activities closed. No further action is planned on this plateau
Kagnaka haul Road	Finalised	The haul road construction is almost completed. Updated LRP submitted to the lenders on August 18, 2023, and awaiting approval. The LRP implementation started in October 2023 (PAP diagnostics). Measures to protect the head water springs are implemented.
Kagnaka Plateau	Finalised	LDP process is fully completed. Updated LRP submitted to the lenders on August 18, 2023, and awaiting approval. The LRP implementation started in October 2023 (PAP diagnostics). <i>Post visit note: LRP approved in February 2024.</i> Stripping started.
Parawi 5 and 3a	Finalised	Biodiversity assessment, baseline data collection, inventories, compensations completed. Updated LRP submitted to the lenders on August 18, 2023, and awaiting approval. The LRP implementation started in October 2023 (PAP diagnostics). <i>Post visit note: LRP approved in February 2024.</i>
Mbouroré Plateau	In progress	Site reconnaissance, biodiversity and monitoring assessment complete, inventories and compensations ongoing. Notification sent to the lenders. LRP in development, compensation on going (40% completed).
Parawi 3b Plateau	Suspended	Remains suspended because of the speculative construction of buildings and commencement of economic activities in the affected area. Biodiversity and monitoring aspects are completed.

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

3.4.2 Exploration campaigns

South of Cogon

CBG has obtained prospection LDPs from the administration and performs explorations in South of Cogon at the areas indicated as “Blocks Test”.

Community consultations and inventories are reportedly completed at these areas, and compensations are paid.

North of Cogon

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

The field studies and inventories have been completed and the compensation to the PAPs have been paid (plateaus 22 and 23). The LDP process is still ongoing. The ESIN (Environmental and Social Impact Notice) for the upcoming prospection campaigns has been initiated. Apart from plateaus 22 and 23, any other prospection will be covered by an ESIN.

CBG also initiated exploration for the NoC plateaux.

The plateaus 64, 65 and 74 are targeted for the upcoming prospection campaigns. For these plateaux, the LDP process (including inventory and compensation), and the environment and social impact notice have started. A notification was sent to the lenders.

The LDP will be delivered when the compensation will be paid to the PAPs.

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

As reported previously, at this stage no firm decision has been taken to mine the NoCo Concession Area. In the event CBG decides to seek international financing to mine NoCo, the impacts will be subject to a separate independent analysis; as such NoCo activities are largely outside of the IESC's current scope and, at the request of Lenders, the IESC has adopted a watching brief in respect to NoCo activities. In the interim, any activities undertaken NoCo (for example exploratory drilling) should be subject to the IFC PS-aligned ESMS.

3.5 CAO Process

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

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

4. HSECQ RESOURCES

4.1 Overall HSECQ Organizational Structure

As mentioned earlier, the health, safety, environmental and social (HSE&S) matters for the Phase 1 Expansion Project, the MUOA Project and CBG's wider operations, fall within the remit of the CBG's Health, Safety, Environment, Communities and Quality (HSECQ) Department. The HSE&S matters are managed under the same E&S management system. The figure below shows the overall HSECQ organizational structure (no change since the last monitoring report).

The IESC notes the following changes to the HSECQ team since the last site visit report:

- the Environmental and Social Reporting team has been raised to the rank of a new service line and includes today 3 members.
- many of the earlier vacant posts have been filled (see subsequent sections below).

Overall CBG's efforts to strengthen the team have paid off, resulting in stronger teams (with key roles being filled), more human resources, leading to great improvements in the management of HSE&S matters (for instance in the environmental monitoring, see section 4.3).

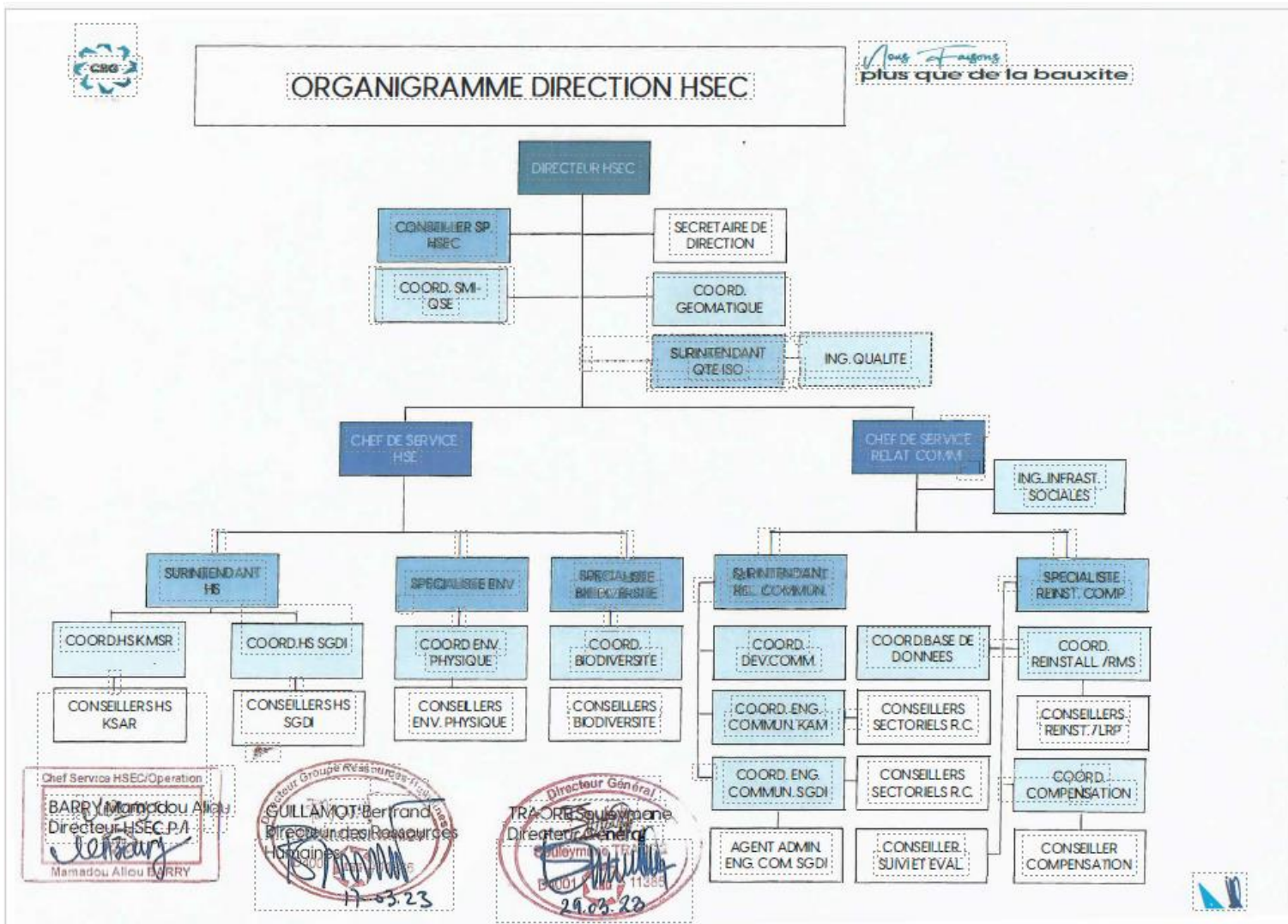


Figure 4-1: HSECQ Organigram

4.2 Environmental reporting team

CBG has appointed a new leader following the departure of the previous Environmental and Social Reporting team leader in July 2023.

In addition to that and as mentioned earlier, the Environmental and Social Reporting team has been raised to the rank of a new service line, however the team’s organizational structure and recruitment plan hasn’t yet been validated by the management. As of today, the Environmental and Social Reporting team is composed of 3 members, and its responsibilities include:

- Coordinating the implementation of sustainable development projects;
- Supporting the promotion of the company's social and environmental responsibility;
- Ensure reporting of our environmental and social obligations.

4.3 Environmental Monitoring team

In 2022, CBG recruited 5 people to strengthen the Environmental Monitoring team capacity in the view of the amount of monitoring required for the site’s activities. These recruits helped to increase the number of monitoring samples taken, reducing the number of sample omissions from 29% in December 2022 to 17% in May 2023. Since June 2023, the Environmental Monitoring Team Leader role (vacant from March to September 2023) has been filled. In addition, the Environmental Monitoring team grows as a new environmental advisor based in Kamsar already joined the team, and an environmental advisor is under recruitment in Sangarédi at the time of the site visit.

CBG’s efforts to recruit in the team has resulted in an improved performance; the team reached its objective of 100% samples completion in October 2023 (excluding the fixed air monitoring station in Kamsar).

The organigram of the Environmental Monitoring team as presented during the November 2023 is shown below.

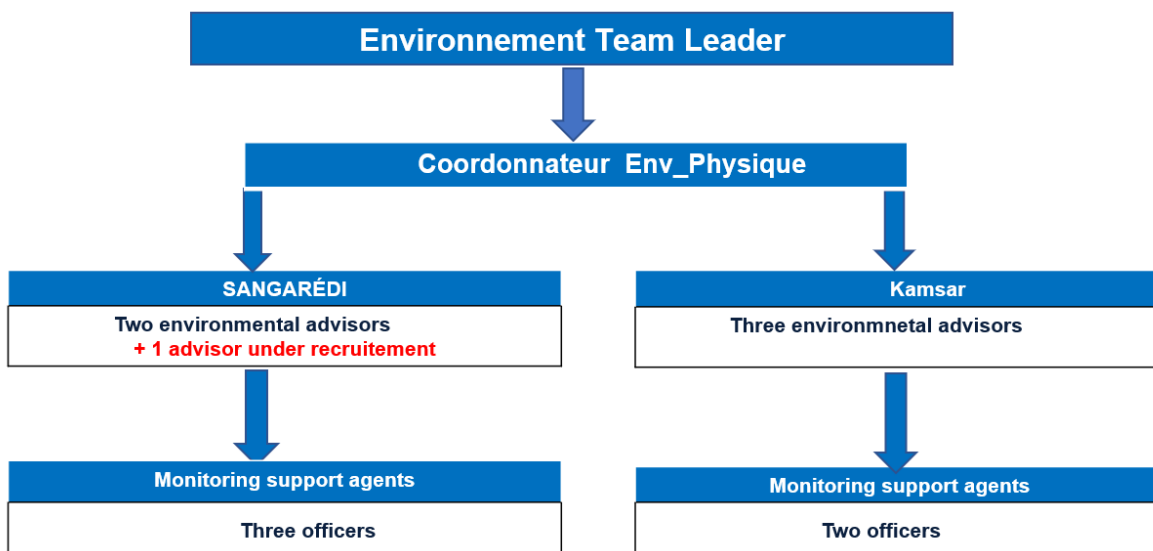


Figure 4-2: Environmental Monitoring Team Organigram

4.4 Health and Safety team

The IESC has previously reported CBG’s intention to recruit a permanent HSECQ Director following the departure of the previous HSECQ Director. In the interim, as reported previously, the Head of

HSE Department continues to fulfil the role as the Acting HSECQ Director. A Special H&S Advisor reports directly to the Acting HSECQ Director.

The H&S superintendent (reporting to the Acting HSECQ Director) is the team leader of two H&S Coordinators (1 in Sangarédi and 1 in Kamsar). The H&S teams' organization has remained the same for several years, with advisors based in Sangarédi and Kamsar. In 2023, 7 HSE advisors were recruited to strengthen the operational division teams (+ 1 in January 2024), resulting in all operational divisions having a H&S advisor.

4.5 Biodiversity team

The team remains the same as before which continues to be sufficient for its requirements. It comprises the following seven positions:

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

4.6 Community Relations (CR) team

At the time of the November 2023 site visit, the following new personnel had officially joined the CR team in the last 6 months:

- 1 Database Coordinator (working with the resettlement and CR teams)
- 1 Monitoring Evaluation Advisor
- 1 Community Relations Advisor

In addition, the CR team is in the process to recruit 3 additional Community Relations Advisors in line with CBG's 2023 Recruitment Plan. The IESC understands that delays in the recruitment process were due to problems in the medical screenings of some candidates; reportedly, recruitment of these additional profiles is expected to be concluded in Q1-2024. The IESC also understands that all the recruited and planned to be recruited personnel will be based in Sangarédi; and no new personnel have been or will be appointed in Kamsar, despite what has been reported in June 2023⁶. It is IESC's understanding that 6 CR team members are based in Kamsar, at the time of reporting.

With new hires over the past 6 months, the CR team (excluding resettlement) is therefore composed of the following people:

- 1 head of community relations based in Kamsar
- 1 community relations (CR) superintendent (CR) in Kamsar
- 1 CR development coordinator in Kamsar
- 1 CR engagement coordinator in Kamsar
- 1 CR engagement coordinator in Sangarédi
- 6 CR and litigation advisors: 2 in Kamsar and 4 in Sangarédi
- 1 CR engagement administrative officer based in Sangarédi

⁶ In the June 2023 monitoring report, it is read "Despite the recruitment of several HSECQ staff members, the recruitment levels discussed with the IESC in December 2022 (5 new resources planned to be appointed overall between coordinators and advisors in Sangarédi and Kamsar) have not been achieved.

- 1 social infrastructure monitoring engineer based Sangarédi (working with the resettlement and CR teams)

The IESC understands that by 2024, CBG plans to have 5 additional personnel appointed as part of the CR team, all based in Sangarédi. The IESC considers positive the additional resourcing planning and the allocation of personnel in Sangarédi where community engagement requires particular attention.

4.7 Resettlement team

The following positions in the Resettlement team were recruited in the past six months:

- A resettlement specialist with responsibility to lead the Resettlement team and reporting to the Head of Community Relations.
- A Monitoring & Evaluation officer.
- Two LRP advisors, recruited through a temporary employment agency while the recruitment process for permanent LRP Advisors continues.
- A compensation officer.
- A Database coordinator (shared resource with the CR team)

With these recruitments, the Resettlement team now includes 8 people, a significant increase compared to the 3 people-team in 2019:

- (1) Resettlement Specialist
- (1) Coordinator
- (1) Resettlement advisor
- (2) LRP advisors (temporary employees)
- (1) LRP advisor (CBG)
- (1) Compensation coordinator
- (2) Compensation advisors.

In addition, the following contractors are supporting the CBG Resettlement Team on a regular basis:

- Acorn for the resettlement consultant (contract up to December 2023, in the renewal process)
- SAMEC for inventories and surveys (contract up to December 2023, in the renewal process)
- CEMED for LRP development (contract up to August 2024)
- SIGMA for the geo-referencing of data (contract up to December 2023, in the renewal process)
- Phénix for LRP implementation (2-year contract for the MUOA LRP, 3-year contract for the Mine LRPs)

A 3-year contract is in the procurement process for provider Expertise Sud to replace CECI in the implementation of the extended phase of Hamdallaye and Fassaly LRP.

The IESC acknowledges CBG effort to raise the level of human resources dedicated to Resettlement and will continue to monitor the adequacy of resources in future report. See section 6.1 for more details.

5. SIGNIFICANCE ASSESSMENT

5.1 Review findings

A summary of the review findings is presented in a significance table at the end of each PS Section. In the tables each finding is presented as an issue, and the following information is provided:

- The identification number for the finding
- The aspect;
- A description of the issue, for example deficiencies or omissions;
- Recommendation, where applicable, to resolve/manage a deficiency;
- The significance on a three-point scale (see below for criteria for assigning significance);
- The status of the finding at the time of reporting.

Each finding is assigned a unique code that reflects the month and year of the site visit during which the observation was made. At the start of each subsection, a table is provided that enumerates both new and legacy findings pertinent to that specific subsection. In cases where a subsection contains no relevant findings, a table will not be included in that particular subsection.

Legacy findings are closed when the actions performed by CBG have addressed the issue to a satisfying level. Should the original description of an issue no longer be applicable and necessitate an update, the legacy finding is replaced by a new finding. Such superseded findings are then documented in Appendix 2 of the report. If parts of the finding's recommendation are still applicable and others aren't, the finding is kept but the recommendations no longer applicable are removed.

5.2 Assessment of significance

A ranking system has been used to indicate the relative significance of each issue identified. As well as highlighting the most important areas requiring improvement, it can also be used to aid the tracking and rectification of improvement measures.

Identified issues have been placed into one of the following three categories:

- Minor:** Minor non-compliance, risk or minor technical breach of Applicable Standards and commitments with no material, actual or likely potential environmental or social consequences, or significant human injury or harm;
- Moderate:** Moderate non-compliance or risk with actual or likely potential localised and short-term environmental or social consequences, minor human injury or harm or material short-term breach of Applicable Standards and commitments; and
- High:** Major non-compliance or risk with actual or likely potential spatially extensive and/or long-term environmental or social consequences, serious human injury/death or harm or material and extensive breach of Applicable Standards and commitments.

Time-critical issues measures can lead to a higher classification of significance. Conversely, high significance issues can be given a lower classification if measures are in place/in progress to address a concern.

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

6.1 HSECQ Resources

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

6.1.1 Senior HSECQ Positions

Performance Standard 1: Senior HSECQ Positions	
Associated open finding(s)	New: Nov 2023_HS_001 Legacy: NA

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

- The Environmental Monitoring Team Leader role has been filled in September 2023.
- A permanent resettlement specialist has been hired in August 2023 to fill the Resettlement Manager's position vacant since October 2021.
- The HSECQ Director⁷ role continues to be fulfilled by the Head of HSE Department (now the Acting HSECQ Director); and ongoing support from a number of consultancies (as reported previously) continues.

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

6.1.2 Community Relations (CR) team

Performance Standard 1: Community Relations (CR) team	
Associated open finding(s)	New: NA Legacy: Dec 2022_002:

Despite the recruitment of several HSECQ staff members, the recruitment levels discussed with the IESC in June 2023 have not been achieved, although progressed. IESC recommendation on the acceleration of the recruitment process is therefore still valid.

Since Q3-2023 the Database Coordinator is part of CBG's Social team (CR + Resettlement). Based on the discussions held onsite, the IESC understood that the Database Coordinator is currently supporting the Resettlement team and no lead activity has been taken to support the IsoMetrix Customization and Implementation (see section below for further details).

⁷ HSECQ Director left his post in early 2021.

6.1.3 Subcontractors and third parties

According to the material provided for review, the contract with ACORN, expiring in December 2023, was under renewal process at the time of the site visit for the assistance on the revision of management plans, monitoring and evaluation of these plans, ESAP deliverables and support to the CAO mediation process. At the time of the site visit, the 1-year contracts with NGOs CEFACAM and FMG (malaria programme), CEFAD (communication on railway safety) were still valid, with the activities undertaken in 2023 under finalization. The IESC understands that contracts may be renewed automatically although no discussion has been held on their actual continuation in 2024. AJDEF's support, local NGO specializing in raising awareness of gender-based violence, provides services on an as-needed basis.

More details are provided in the ensuing sections.

6.1.4 Equipment Resourcing and software

Performance Standard 1: Equipment Resourcing and software	
Associated open finding(s)	New: Nov 2023_SO_001, Nov 2023_SO_002 Legacy: June 2023_002, Dec 2022_004

Based on discussions held on site, the IESC understood that a Project to customize IsoMetrix for all E&S aspects, particularly for Social and Biodiversity, led by the IT department, was about to be launched the week following the IESC's monitoring visit, with completion expected to occur by the end of Q1-2024. The IESC also understood that the project is overseen by the Finance Manager in his role of Sponsor and the IT Project Manager as Champion. At the time of the site visit, the CR team was actively engaging with the IT team to share templates for social topics (e.g., stakeholder engagement, grievance management, cultural heritage) and to start a needs analysis as part of project development. This is considered positive by the IESC. Nonetheless, the IESC also understood that the Database Coordinator was not supervising any of the activities related to the IsoMetrix customization project as he has been supporting more the Resettlement team in the field since his appointment.

The IESC notes that the absence of a Database Coordinator has been often reported as the main reason for the delay in the IsoMetrix customization and implementation, according to discussions held in previous site visits; and that the actions undertaken by the CR team for the need analysis phase, currently underway, could have started earlier considering it is happening with no support from the Database Coordinator. The IESC therefore deems that IsoMetrix customization and implementation can be undertaken with no further delays, particularly when it comes to the customization of social data and expects that IsoMetrix will be fully customized and operational by the next monitoring visit. While the IESC cannot opine on the selection of the Sponsor and Champion, the IESC would however suggests considering the inclusion of one E&S representative in the Sponsor-Champion approach adopted for the customization of IsoMetrix which is now lacking.

In the meantime, the IESC notes that social data have been uploaded onto IsoMetrix and a few examples of registers and dashboards related to community grievances and social initiatives have been shown during the monitoring visit. The IESC already recommended a few areas for improvements in the June 2023 Monitoring report, particularly in relation to consistency between IsoMetrix templates and relevant ESMPs and expects now that these recommendations are taken into consideration in the IsoMetrix customization project.

IsoMetrix isn't implemented for environmental monitoring results yet. No deadline for its use with environmental data was provided, however CBG currently uses a Sharepoint document repository for its environmental data. The Sharepoint has been observed to work and to be used by most CBG employees interviewed during the visit.

As concerns equipment resourcing, the IESC confirmed presence of delays resulting from procurement of goods and services, with specific discussions held over the request of 2 additional vehicles for the CR team, which was made two years ago and has not yet been satisfied. In addition, at the time of the November 2023 monitoring visit, several vehicles were at the garage for repairs, sometimes for a long and/or repetitive time, which following discussions with different E&S teams indicated an overall degradation of the vehicles' conditions.

IESC's previous recommendation of a detailed review of CBG's current procurement procedures to identify bottlenecks and/or inefficiencies responsible for delaying the procurement of goods and services is still valid. In addition, the IESC recommends that CBG undertakes an analysis of support resource requirements, for example in terms of new vehicles and office space, taking into account the increased size of the overall E&S team. Based on observations made onsite, the IESC also recommends that CBG ensure possibilities for the Social team to access to petty cash to better support community engagement and the Social team's adherence to customary practices, such as customary prayers, gift at the end of meetings. These expenses are currently managed by each Social team member personally, on their own money, which the IESC understands are not reimbursed. Possibilities to access to petty cash should be regulated through the implementation of a fast-track procedure that, if not already in place, should be developed in line with CBG policies and relevant internal procedures.

6.1.5 Training

Performance Standard 1: Training	
Associated open finding(s)	New: NA Legacy: Dec 2022_006, Dec 2022_007, Oct 2021_011

CR team

In the second semester of 2023, CBG has undertaken the following training:

- Social management for participatory and sustainable development in mining regions. Centre for Social Excellence (CSE) - Boké (4 months of course) and 6 months internship: started, in August 2023 and ongoing at the time of the monitoring visit, undertaken by 1 member of the Sangarédi CR team.
- Basic management: a 3-week training provided by Africaconsult between September and October 2023, undertaken by 4 members of the CR team from Kamsar (2 people) and from Sangarédi (2 people)

The following trainings, planned to occur between September and November 2023 have been postponed due to either administrative or political reasons (i.e., following events in Guinea on November 4, 2023 when Guinea's former military government leader Moussa Dadis Camara was recaptured and back in prison):

- 2-week training on land acquisition and resettlement at the University of Gröningen that was planned to be undertaken by one member of the Resettlement team.
- The following IFC Advisory trainings:

- To strengthen the team's capacity in communication and in development of local communication tools, foreseen on November 6-7 and targeting Social, Environment and Biodiversity teams, a member of the CFB team, members of the Water Production and Distribution team, ANAIM members;
- To strengthen the team's capacity on the complaints management mechanism, foreseen on November 8-9 and targeting the same group of trainees (i.e. Social, Environment and Biodiversity teams, member of the CFB team, members of the Water Production and Distribution team, ANAIM members);

At the time of the site visit, confirmation was yet to be received on the IFC Advisory training on community consultation and gender-based violence (GBV), which was planned to take place on December 6, 2023, and targeting the Social team.

No details have been provided in relation to the IFC Advisory’s training “Strengthen the team's capacity to carry out community engagement and communicate effectively” which, based on the material shared for review, was planned to be undertaken between December 2023 – beginning of 2024 as reported in the timeline shared for review. This training would target CBG’s Social team and Community Leaders

The IESC appreciates that IFC Advisory training has been delayed due to external factors that could not have been foreseen. Nonetheless, the IESC recommends that roll-out of this training occur as soon as possible along with the additional training that has been deemed relevant following the training need analysis for 2024 – shared with the IESC for review.

In relation to E&S training provided to other departments, a minute has been shared for review reporting an induction training provided to the cooling and electricity department in August 2023. Training was provided by the Biodiversity and the CR team. The IESC appreciates the training made, although it is not clear whether there is a more structured training plan on E&S induction to CBG’s various department.

Environmental teams

According to CBG, all trainings required in the environmental management plans are included in the roadmap and integrated into its KPIs. This will be investigated in more details in the next site visit.

6.2 Stakeholder engagement

Performance Standard 1: Implementation of the stakeholder actions	
Associated open finding(s)	New: NA Legacy: June 2023_003, Dec 2022_008, Dec 2022_010, Dec 2022_013, Oct 2021_009, July 2020_007

This section provides an update on stakeholder engagement through the discussion held onsite, and following review of documentation provided by CBG.

The SEP 2022-2025 has been approved by the Lenders and CBG reported preparation of the summary to be posted on CBG’s website as part of the SEP disclosure. During the discussions held on site the IESC understood that SEP disclosure – along with disclosure of the Emergency Response Plan and the Community Development Plan – started in December 2023 among the institutional stakeholders, mainly at the municipality and at the sub-prefect levels and that was still ongoing at

the time of the site visit, including Sangarédi. SEP disclosure at the community level is planned to occur in 2024⁸ as reported in the material shared for review.

The status of the SEP action plan reports an overall 86% progress, compared to 70% recorded as of April 2023 (refer to Figure below). Based on the information provided by CBG, progress since April 2023 is mainly due to:

- The dissemination of the SEP action plan to the authorities and community representatives at mediation has already begun;
- The 2023 operational action plan for the mine, rail and port areas is developed in accordance with the SEP 2022-2025.

The SEP's progress continues to be reviewed monthly by the steering committee (comprised of CBG directors), based on the SEP roadmap monitoring (in line with the approach undertaken for the other managements plants).

Based on the data reported via the material shared for review, the number of people engaged through SEP implementation from January to October 2023 amounts to 9,838 (80% at the mine, 16% along the railway, and 4% at the port).

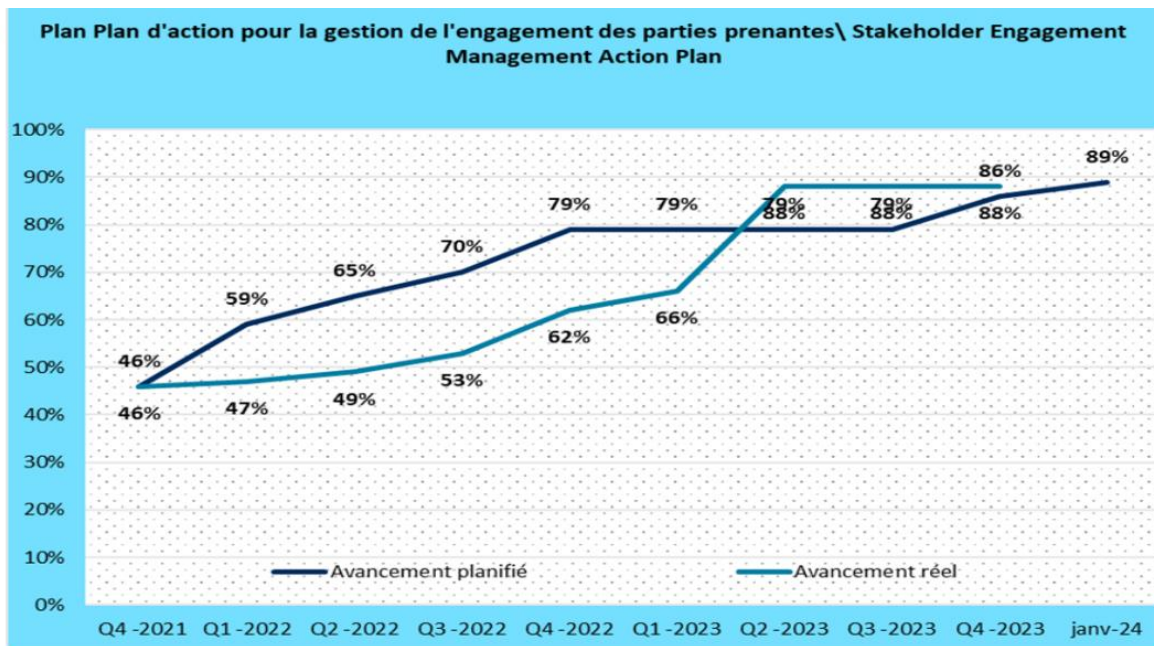


Figure 6-1: SEP Action Plan Status as of 31 October 2023

The SEP implementation continues to record a delay mainly due to the engagement pertaining to the LRP – although this matter was not further investigated with the CR team, and will be investigated during the next site visit.

Engagement occurred in the North of Cogon concession to inform stakeholders about consultant visits in relation to the undertaking of feasibility studies and socio-environmental impact studies in the area which is confirmed to be underway.

Reportedly, CBG releases copies of minutes to communities particularly in case of sensitive subjects which in this case are signed. Some of the reviewed minutes of meetings inform of the sharing of the minutes with communities as a next step.

⁸ A summary of the SEP was disclosed in February 2024

The participatory environmental monitoring procedure (requested in the previous IESC report) has been shared for review, describing key steps for its implementation, including establishment of community monitoring committees and their composition and functioning. The IESC understands that the environmental monitoring committee is composed of 2 community representatives (selected based on their availability, their ability to read and write and communication skills, and their credibility perceived by the communities of reference), 2 CBG representatives from the CR team and the environmental team, and 1 representative of the technical team. **Based on the procedure, the environmental monitoring committee participates in data collection, organize (planning and implementation) quarterly meetings to present monitoring results; monitor corrective actions in case of detected non compliances, and present any potential community concern.** Based on the material shared for review, 18 environmental monitoring committees have been established, with 12 in the mine area and 6 at the port and along the railway. Community representatives have been identified, including women in the area of Sangarédi, though the procedure does not explicitly indicate presence of women among the selection criteria; 2 inductions have been organized targeting community representatives to explain the overall participatory environmental monitoring process between July and August 2023 in Sangarédi, and in September 2023 in the area of Kamsar, Kolaboui and Boké. Another meeting on the participatory monitoring and on a more dedicated inductions on monitoring equipment has been held in November 2023 in N'Dangara targeting the 12 villages in the SoC concession. **Based on the minute of meeting shared for review, the IESC observes that some concerns have been expressed by the participants on the mitigation measures to be applied in case of exceedances, and on the overall restitution strategy, and reception of copies of the monitoring results.** The actual monitoring campaign was planned to start in December 2023. The IESC will monitor progress in the next monitoring visit.

The IESC continues to confirm that the SEP has been implemented with ongoing engagement organized and carried out regularly by CBG’s CR team. Based on the information presented by CBG, most of the engagement activities continue to occur at the mine (341 meetings, 72%), then at the port (32 meetings, 7%) and along the rail (97 meetings, 21%), covering CBG’s operations (85%), resettlement (12%) and finally the Multi-User Project (3%).

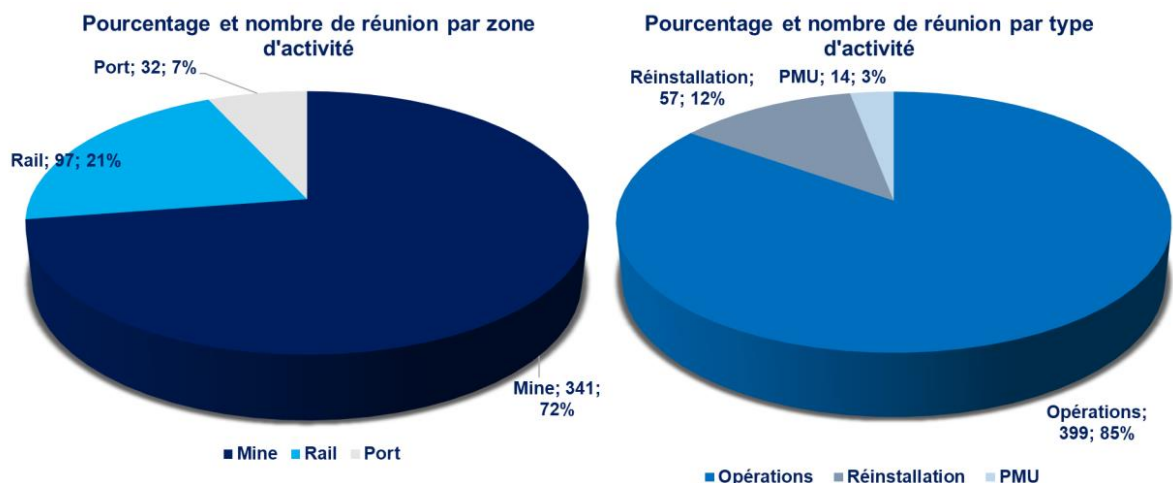


Figure 6-2: Meetings by zone and type of activity as of 31 October 2023

Due to administrative reasons – necessity to organize logistics through formal requests for proposal - no consultation forums (cadre de concertation) have been organized in 2023⁹.

⁹From the December 2022 Monitoring report, "Since February 2022, CBG has started meetings with consultation forums (cadre de concertation) mainly including institutional stakeholders, Non-Governmental Organizations (NGOs), technical experts and communities "with a view to involving the various stakeholders in peacekeeping solutions between the neighbouring communities and the company", and share and discuss Project updates. To date, 6 consultations forums have been organized across CBG's operational sites; the IESC

In addition to community meetings, CBG has conducted 15 meetings with municipal and administrative authorities, with 9 meetings reported in the last part of 2023 (April-October 2023), and 13 meetings with national Non-Governmental organizations (NGOs), with 9 additional meetings held from April to October 2023, including association of people with disability and the youth: 'ACDI/VOCA', 'Action Mines Guinée', 'Vision Sans Frontière', 'Fraternité Médical Guinée', ONG 'CHIMBO'; 'APHAS' ('Association des personnes Handicapées de Sangaredi'); 'APHAS' ('Association des personnes Handicapées de Kamsar'); 'Club des jeunes filles leaders de Sangarédi'; 'UDRID'; 'Jeune Solidaire pour le travail et l'innovation'; 'Jeunesse Paix et Développement de Sangarédi'; 'l'Association des Jeunes Entrepreneur'.

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

- **Mine:** Employment of local labour; Capacity building for young people; Reprofiting of community access roads; Improved access to drinking water (borehole); Construction / renovation of infrastructure (schools, health centres, etc.); Livestock accidents; Improvement of electricity supply.
- **Rail:** Improved access to drinking water (borehole); Request for installation of wire fencing in certain villages along the railway; Community access roads; Employment of local labour.
- **Port:** Demand for basic social infrastructure; Community access roads; Access to drinking water; Electricity supply.

Regarding stakeholder engagement at the port, pilots specialising in boat /speedboat driving have been made available to the HSEC teams to assist the social, environment and biodiversity teams at sea and on the islands with community meetings and environmental monitoring. Minutes of the meetings held in July 2023 at the Islands of Taidy and Dahomedy have been shared for review and reports complaints associated with marine traffic caused by activities not carried out by CBG; on this matter, the minute informs that CBG will inform the Community Relation teams of the involved companies about these complaints as next action. This is seen positive and it is suggested following up on this matter in future engagements with these communities.

CBG has continued conducting focus group discussions/community engagement with women and the youth. From January to October 31st 2023, amongst the participants to the community engagement meetings (including larger community meetings and the focus groups that the IESC understands are organized straight after the community meetings), 28% were women (2% increase compared to April 2023 data) and 40% (2% increase compared to April 2023 data) were young people.

During the November site visit, the IESC met the NGO "Assistance Justice aux Droits des Enfants et Femmes)" (ADJEF) who had supported CBG in awareness raising on gender-based violence as part of Women's Right Day in March 2023. The IESC also understood that CBG allows ADJEF to use CBG's radio to divulgate gender-related messages regularly, but no other specific events have been undertaken in the second part of 2023. The IESC notes that IESC's previous recommendation for CBG to develop a more structured plan and:

- continue organizing such events, also considering AJDEF's above-mentioned recommendations.
- start considering the involvement of male workforce in these initiatives or other initiatives that might be organized jointly with AJDEF (or any other NGOs or entity relevant to the purpose);

also understands that these open consultation forums – as organized by CBG - constitute a space for presenting CBG's activities and discussing complex issues, collecting and discussing participants' concerns. In addition, the IESC understand that such consultation forums have been positively welcomed by all participants, including local and administrative authorities, Civil society organisations (NGOs, women's and youth associations and others), and communities, with a general request to make such forum a permanent consultation channel."

- while awaiting the provision of IFC Advisory’s training on Gender Based Violence and Sexual Harassment (GBV-SH), collaborate with AJDEF (or any other NGOs or entity relevant to the purpose) to conduct gender-sensitive consultations to investigate possible presence of GBV-SH issues.

Based on the material shared for review, the IESC understands that CBG has engaged with the NGO APHAS (‘Association des Personnes Handicapées’ or Disabled People association) in Sagarédi and Kamsar. In particular a minute of a meeting held in July 2023 at the sub-prefect in Kamsar at the presence of the authorities and People with Disabilities has been shared for review. Similar to what was already indicated in the minute of meeting shared during the June 2023 monitoring visit, this latest meeting confirmed the lack of concerns in relation to the railway crossings (mainly due to the use of railways crossings); on the other hand, requests for assistance have been raised by the participants, in particular the development of a solidarity centre to develop job skills to strengthen self-sustain capacity. Whilst IESC appreciates that discussions occurred over railway crossing, IESC’s previous recommendation for a more systematic engagement with People with Disability (PwD) is still valid, especially to discuss the topic of betafencing and verify particular needs in terms of crossing points, before the installation of the betafences in Kamsar (also refer to Section 9.3) and also to address previous recommendations to engage with communities to evaluate the number and residence of persons with reduced mobility (e.g. due to age or physical disability) that will not be able to use the footbridges; and to explore mitigation measures to alleviate risk of pedestrian accidents, including physical separation of vehicles and pedestrians at level crossings.

During the November 2023 visit, the IESC had a meeting with the community of Filima in Kamsar, confirming CBG regular engagement and interaction. Nonetheless, the community in Filima also reported delays in CBG’s responses to community’s concerns which CBG needs to address (refer to ensuing section 6.3 on Grievance Management) within a timeframe as per the grievance management plan.

6.3 Grievance Management

6.3.1 Updated Grievance Management Procedure

Performance Standard 1: Updated Grievance Management Procedure	
Associated open finding(s)	New : NA Legacy : March 2022_004

During the November 2023 monitoring visit and through the material shared for review, the IESC understands that the Grievance Management Procedure is still under revision to take into account minor changes required after the last CAO Session. The IESC also understands that IESC’s request to have a comprehensive list of KPIs pertaining to grievance management within the Grievance Management Procedure is going to be fulfilled through this latest revision process.

6.3.2 Grievance Management Status

Performance Standard 1: Grievance Management Status	
Associated open finding(s)	New: Nov 2023_SO_003 Legacy: Dec 2022_015, Dec 2022_016, Dec 2022_017,

An updated community grievance register has been shared for review, and now lists all the complaints recorded in 2023 until October 2023. Following IESC’s earlier recommendations, the community grievance register has been updated to show progress of complaints management (column Actions taken), closure date, number of days to close the grievance since its recording within the register, and any additional comment. CBG also indicated within the material shared for review that grievances raised during the CAO mediation are regularly recorded in the grievance register; however, the IESC could not easily identify them. The IESC still recommends that additional information be added to the grievance register to inform on the presence of the CAO mediation and that such information be reported as part of the grievance monitoring to better inform on which open grievances are in fact under CBG direct management versus CAO mediation process.

Grievances received in 2023 are mainly related to resettlement matters (62%), security (15%), environment (8%), and socio-economic matters such as employment, electricity, water, infrastructure (15%). Excluding resettlement related grievances (discussed in other sections of this report), CBG reports to have 29 closed grievances and 14 open grievances.

The Q3-2023 Borrower E&S certificate provides further details on the grievances received in the period, particularly indicating that CBG was able to close 9 out of the 26 grievances registered in the third quarter of 2023.

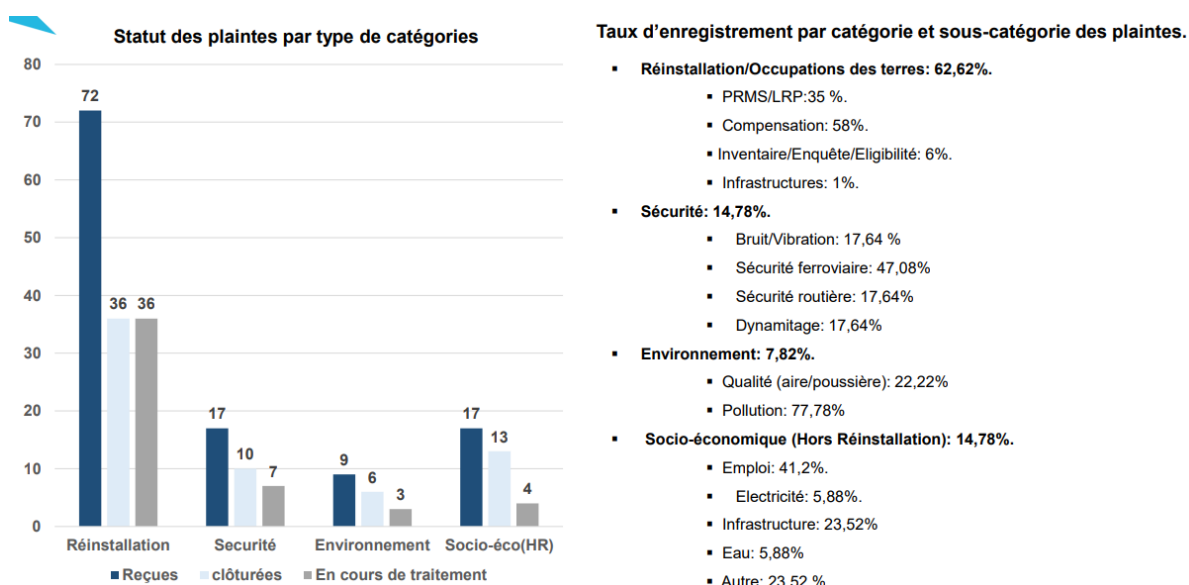


Figure 6-3: 2023 Grievance status by category

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

- Environment (water pollution):** Fewer complaints, but the impact concerns several villages and some sectors bordering the Sangarédi housing estate impacted by siltation of surface water (i.e. Fassaly Foutabhè, Fassaly Belendèrè, Silidara, N'dounsi). On this matter CBG recognizes the high-reputational risk and they are working on multiple fronts (construction and maintenance of several settling basins, completion and rehabilitation of boreholes in 56 villages (see section 8.3)).
- Safety (Blasting and Rail):** There are fewer blasting related grievances due to improved process (see section 8.6); Accidents involving livestock on the railway remain a major concern for communities, with CBG considering mitigation measures including installation of wire fencing along 7 of the most exposed riverside villages in the mine zone (refer to later section for more details).

- Socio-economic (excluding RAP): Lower number of grievances, mainly relating to electricity and employment issues. Particularly in relation to electricity supply, it is understood that CBG has donated to the State 5 million USD to facilitate the electrification of the Boké region although the IESC acknowledges that CBG is not responsible for the electrification of the region.

Based on the review of the Q3-2023 grievance and community requests register, the IESC confirms the results of the above-mentioned risk-analysis. In general, the grievance register appears to be more systematically updated and the IESC confirms it contains more detailed information to understand the progress made with grievance management. For example, all employment related grievances have been closed and actions taken have been described; and no further grievances related to employment have been recorded in the last months of 2023.

However, the IESC notes that among the 58 closed grievances, 31 have been closed after more than 50 days, which is the expected time limit for the processing of grievances from submission to closure according to the Grievance Management Procedure. Moreover, 24 of them exceeding 90 days. In addition, improvements can be made to ensure that updates are provided on all the grievances as the IESC observes open grievances with no update (as most of them do not contain information even though recorded in early or in the middle of 2023) - e.g. January 2023 (1 grievance), in February (1 grievance), and in July (multiple grievances). As a way of illustration:

- A couple of grievances have been recorded between June and July 2023, pertaining to disruption to access route to a plantation in Kagnaka (grievance #23066) and to a cemetery in Dar es Salam, which are still open (grievance#23075). Though comments have been added to update on the progress made and discussions held between CBG and the railway operator to find a solution, the grievances are still open without information on why the grievances are still open.
- 1 grievance (grievance #23080) has been submitted by one member of the Filima residents in Kamsar, in July 2023, on the damage of a house, allegedly caused by the passage of the trains. During the November 2023 monitoring visit, the IESC had a meeting with the Filima community that informed that they were still awaiting updates on the matter, despite the regular engagement with CBG. The IESC understood that the CR team was in dialogue with the environmental team to carry out vibration monitoring at the damaged house and that unavailability of the necessary monitoring equipment - which was currently used in the communities at the mine area - had caused this delay. While IESC has already included recommendation on assessing availability of all necessary equipment to better support CBG's team performance; the IESC also recommends more prompt actions to ensure more timely grievance management.

While the IESC did not observed any recent grievances relating to livestock accidents, during the November 2023 monitoring visit the CR team confirmed that new grievances had been received recently and that communities are increasingly frustrated, with some of them located around the mine, having required installation of betafences to protect their livestock from crossing the railway and getting run over by the trains. The IESC understood that CBG plans to discuss options / solutions in the upcoming weeks along with the legal department. More details in section 9.3.

Based on CBG's documentation received for review, some grievances from 2020 and 2021 are still open (see earlier IESC reports). Figure 6-4 also reports status of grievances from 2020 to 2022, divided in received grievances (in blue); closed grievances (in grey) and open grievances (in turquoise). To show progress, the figure below also shows comparison between the data received following the November 2023 monitoring visit (to the right) and those that had reported as part of the June 2023 monitoring visit. Details of the status of the 2020-2022 grievances have been shared for review. The IESC understands that the majority of them are related to resettlement and compensation issues or involve the CAO mediation. The Q3-2023 Borrower E&S Certificate reports

that 5 grievances from 2022 and 2021 were closed in the third quarter of 2023. While the IESC will further discuss progress on these grievances during the next monitoring visit, the IESC recommends that CBG gives priority to managing and monitoring progress of all past grievances and to use appropriate KPIs to assess improvements in CBG’s grievance management.

Based on the material shared for review, CBG has observed an increasing number of women submitting complaints (9.5% in 2023) compared to available 2022 data (4.8%) and 2021 (3.6%). Organization of Focus groups discussions were given by CBG as one of the reasons for such increase.

Overall, CBG continues to organize community meetings to raise awareness around the community grievance mechanism, with 144 meetings held between January and October 2023 including the grievance mechanism.

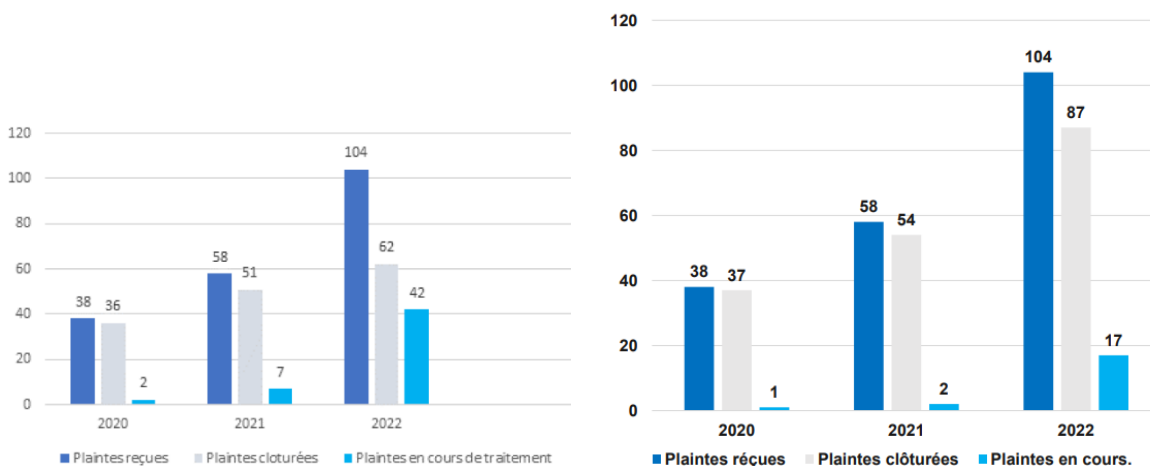


Figure 6-4: Grievance status raised from 2020 to 2022, comparison between data shared with the IESC in June 2023 (on the left) and November 2023 (on the right).
 (dark blue: received complaints, grey: closed complaints, light blue: complaints currently addressed)

6.3.3 Community Requests for Assistance (*Doléances*)

Performance Standard 1: Community Requests for Assistance (<i>Doléances</i>)	
Associated open finding(s)	New : NA Legacy : Dec 2022_020

The difference between grievance and doléance is as follow: A grievance stems from an impact due to the operations of CBG or its subcontractors, or arising from activities related to resettlement. A community complaint (or doléance) is a concern or a request for assistance expressed by the communities. .

Available data indicate that 91 community requests for assistance were received in 2023 through to October, out of which 38 are already reported to be closed. The majority of the doléances originate from the mine (72), and the remaining are distributed between the port (18) and the railway (5).

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

- 32% of requests are related to basic social infrastructures (opening and maintenance of community roads and renovation of places of worship).
- 22% of requests are related to others (rail safety, Income Generating Activities Programs (PRAMS) or AGR, local employment, compensation and training).
- 5% of requests are related to services (electricity, water, fire brigade and sanitation).
- 41% of requests are related to financial and material support (purchase of furniture and equipment, financing of events).

From the review of the doléance register provided as appendix to the Borrower's quarterly certificate (Q3-2023), the IESC observes that comments have been added to better detail progress or actions taken for more recent community assistance requests which is considered positive and close IESC's previous observations on the matter.

As already reported in the last monitoring report (June 2023), the IESC still awaits the community request for assistance (doléances) management procedure CBG has established and disseminated to communities through Focus groups.

As part of the material shared for review, CBG has also provided information on the past requests for assistance, particularly those received in 2020, 2021, 2022. Based on the information provided:

- In 2020, of the 23 grievances received, 20 have been closed, one has not yet been started and 2 are being processed.
- In 2021, 40 grievances were recorded, 34 were closed, 3 are being processed and 3 have not yet been started.
- In 2022, 61 grievances were registered, 39 were closed, 9 were being processed and 11 not started.

During the discussions held onsite, the IESC understood that delays recorded in the past are mainly associated to either development or maintenance of community roads within the concession. Although the IESC recognizes CBG's efforts to ensure communities have dedicated roads (separate to the haul roads), the IESC notes that requests for assistance on this matter were made 2 to 3 years ago and thus require prompter implementation. A 2/3-year delay isn't appropriate as it may potentially cause trustworthiness issues among communities towards CBG and represents a community safety issue if lack of maintenance is encouraging the use of haul roads by communities. Although the IESC already reported regular community engagement, return of information and management of doléances and grievances in a timely manner, and in line with appropriate management plans is recommended.

6.4 Integrated Management System (IMS)

The IESC main observations from the November 2023 site visit on the IMS are:

- As reported in June 2023, the SharePoint document repository is working and found to be used by most CBG employees interviewed during the visit. The repository ensures document control and provides a single repository for documentation, thereby ensuring access and consistency of usage across all of CBG's functions.
- The Sponsors / Champions approach is still in place and shows CBG's efforts to progress the roadmap's actions. A sponsor and a champion for the implementation of the RPF are planned to be appointed in January 2024.
- The status of implementation for certain Action Plans, including plans that are behind schedule, is discussed further in subsequent chapters of this report. However, as a general observation, the Sponsors and Champions appeared to be fully engaged in the roadmap, with a clear understanding of their roles and responsibilities.

6.5 Environmental and Social Management Plans and Action Plans

Performance Standard 1: Environmental and Social Management Plans and Action Plans	
Associated open finding(s)	New : Nov 2023_EN_005, Legacy : March 2021_008

CBG manages its environmental and social impacts through the implementation of a suite of E&S management plans. Many of these were prepared in late 2018/early 2019 with a 2-year review cycle envisaged. The IESC has highlighted the need to review and update certain environmental management plans in previous site visit reports¹⁰. Whereas CBG recognises the need to revise its environmental management plans, it has delayed the review/update process preferring to tie any update to milestone events, such as completion of the roadmap (recognising the roadmap would likely inform any update of the management plans). The logic is understandable, however, the added delays resulting from the approach has resulted in several plans being out of date and content of the plans increasingly redundant. Thus, the IESC repeats its earlier recommendation that CBG presents a schedule for the review and update of ‘out of date’ management plans to Policy Lenders/IESC, clearly stating any precursors or dependency on other events.

The implementation of the Action Plans, captured in the roadmap and related to the Management Plans, is also behind schedule. As of November 2023, the roadmap’s progression was 95%, with most remaining actions pertaining to the Water Management, Noise and Vibration and Influx Management Plans. Therefore, CBG will not complete all the actions specified in the roadmap prior to the January 2024 deadline specified in the ESAP.

6.6 Plateau-by-plateau assessment approach

Associated open finding(s)	New : Nov 2023_RE_003 Legacy : March 2021_006,
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Meetings in the Kagnéka and Guéguéré communities during the visit indicated a potential missing step in the LDP or LRP development process. Both communities expressed concerns about their future livelihoods and living conditions. From the discussions, more formal discussions and agreement with the communities regarding impacts (e.g., communities inquiring about the location for their livestock or being unaware of the land acquisition extent - in ha – for their village) or potential mitigation measures (e.g., communities inquiring about the sequence of Plateau exploitation or requesting alternative access roads or water boreholes) may be needed.

CBG also informed the IESC that the Guéguéré community had requested a meeting a few weeks before the visit due to concerns about future mining impacts. The CBG resettlement consultant mentioned considering expanding the LRP social study process to encompass topics beyond the loss of agricultural land.

This feedback from the communities may imply that the current LDP process appears to lack a robust environmental and social impact assessment that would, for instance, consider social impacts beyond cultivated land or sacred sites, such as impacts on livestock, water suppliers, health

¹⁰ For example, Waste Management, Water Management, and Air Quality Management Plans

& safety (noise, vibration, dust, road trafficking) as well as the cumulative impacts of multiple plateaux on the villages. This issue should be considered in conjunction with Section 10.5 on cumulative impacts, and further analysis of the LDP impact assessment process will be undertaken during the next IESC visit.

Both in Guéguéré and Kagnaka, several PAPs indicated that they bought new lands in Boulléré. With the exception of the Boulléré road, the village has not been directly impacted by mining activities. CBG needs to review the existing E&S impact assessment process in the LDP and/or in the LRP process and update if necessary to include a more comprehensive assessment and community validation when opening a new Plateau.

In addition to the above, it has been noted in previous site visit report that community consultations occur after the E&S Rapid Appraisal stage, and prior to impact mitigation measures being defined. It is advised to organize one round of community consultations as part of the E&S Rapid Appraisal stage, at a time which CBG considers most appropriate in the local context.

6.7 Procurement

Performance Standard 1: Procurement	
Associated open finding(s)	New : NA Legacy : Dec 2022_005

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

For instance, hold-ups in the procurement process are resulting in the ambient air quality monitoring station in Kamsar not collecting data for multiple months. Indeed, there are no records of NO₂ and SO₂ for the entirety of 2023 and no records of PM_{2.5} and PM_{total} from August to November 2023. Furthermore, PM₁₀ measurements were missing from August through to the conclusion of 2023. CBG hopes the station will be fully functioning at the start of 2024.

Consequently, the IESC recommendation remains open and the IESC intends to maintain a watching brief during future monitoring visit to ensure procurements concerns do not recur in the future. CBG has recently informed that a debottlenecking exercise has commenced and will be subject to further review.

6.8 Management of Change

Performance Standard 1: Management of Change	
Associated open finding(s)	New : Nov 2023_EN_002 Legacy : NA

The IESC has previously highlighted issues with the implementation of CBG's Management of Change (MoC) Procedure and proposed initiatives for its improvement. In March 2022, a MoC Coordinator was appointed, and the MoC Procedure was reviewed by the HSECQ Department, leading to several recommendations for an updated MoC procedure. These recommendations encompassed the appointment of MoC Champions, staff training, and extended deployment of the procedure. By the December 2022 site visit, substantial progress was evident with the formation of an MoC committee, a drafted new MoC procedure, and a revision of the MoC register and forms. As of the June 2023 site visit, weekly meetings were being held by the MoC team, comprising seven members, and spearheaded by the MoC Coordinator and Sponsor.

During the interviews on the 18th December 2023, the IESC discussed with the MoC's Champion (new since August 2023). Since the June 2023 site visit, the MoC procedure has been approved, staff training on the procedure has been provided to 47% of the targeted employees (out of the 50% planned), and rolled out across the various CBG functions. Contacts in each department affected by the procedure were identified. By March 2024, CBG aims to:

- Complete the training on the MoC procedure.
- Further extend the MoC procedure to non-E&S aspects such as human resources, IT and day-to-day production operations (through an update of the MoC procedure);
- Integrate the MoC procedure into IsoMetrix;
- Recruit a MoC coordinator;
- Identify the procedures that are linked to the MoC in order to ensure references to the MoC procedure when applicable.

CBG should continue to finalise the MoC Action Plan and roll out the measures therein as a matter of priority and ensure systems are put in place to make adherence to management of change mandatory.

6.9 PS1 Open Findings

6.9.1 PS1 High significance findings

Table 6-1: Summary of open high significance findings, PS1

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_HS_001	Organizational capacity and competence - staff resources	HSECQ Director is still in vacant position. The current Acting HSECQ Director is the head of HSE department.	CBG to clarify its position and agree on a timebound plan to appoint full-time HSECQ Director with the policy lenders to resolve this issue.	High	Open
Nov 2023_SO_003	Grievance Management	The grievance register informs that out of 58 closed grievances in 2023, 31 have taken more than 50 days to close- i.e. longer than timeframe specified in the Grievance Management procedure. 24 grievances have been closed after 90 days.	CBG to expedite resolution of grievances to align with the timeframes specified in the Project Grievance Management Procedure.	High	Open
Nov 2023_RE_003	Social Impact Assessment	Grievances and concerns of the communities around land take impacts and living condition raises the question of the effectiveness of the social impact assessment and agreements with the communities around mitigation measures in the LDP and/or LRP process for new Plateau opening.	Review the existing E&S impact assessment process in the LDP and/or in the LRP process and update if necessary to include a more comprehensive assessment and community validation when opening a new Plateau.	High	Open
Dec 2022_013	Stakeholder Engagement	While disclosure of environmental monitoring methodology occurs, CBG has not started	Disclosure of Environmental monitoring results to be organized as a priority.	High	Open The IESC has not received tangible

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
		disclosing environmental monitoring results to communities.			information on the disclosure of all available environmental monitoring results to communities
Dec 2022_015	Community Grievance Mechanism	A number of 2020 and 2021 grievances are still open.	CBG to strengthen the capacity of the monthly HSECQ committee meeting to act swiftly to ensure that there are no institutional 'obstacles' to swift action in terms of: i) recognizing the legitimacy of the grievances; and then ii) putting in place the actions to close them as soon as possible	High	Open (HSECQ committee meeting rescheduled for April 2023 but no updates have been received as follow-up in November 2023)
Nov 2023_EN_005	Environmental Management Plans	Certain Environmental Management Plans have not been updated since January 2019, in part because updates were being linked to outcomes from the implementation of the roadmap/development of the integrated Management System. This finding has been made before (first in December 2022) and is repeated to emphasize an increasing urgency to update the EMPs.	Undertake a structured review of current EMPs (and other plans including cultural heritage and security plans) and update accordingly, keeping the IESC/Lenders informed in accordance with the MoC procedure. As CBG mining activities grow on other plateaus, it is crucial the plans are adjusted to include new measurement locations.	High	Open

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

6.9.2 PS1 Moderate significance findings

Table 6-2 Summary of open moderate significance Findings, PS1

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_EN_002	Management of Change	The current MoC procedure	<p>CBG should continue to finalise the MoC Action Plan and roll out the measures therein as a matter of priority.</p> <p>Systems should be put in place to make adherence to management of change mandatory. For example, purchases could be blocked unless evidence is provided that change management was considered as part of any Purchase Order approval.</p>	Moderate	<p>Open</p> <p>Progress has been made in terms of the wider understanding and implementation of the MoC Procedure. However, finalisation of the MoC Action Plan is ongoing.</p>
Nov 2023_SO_002	Organizational capacity and competence - equipment resourcing	IESC confirmed presence of delays resulting from procurement of goods and services, with specific discussions held over the request of 2 additional vehicles for the CR team, which was made two years ago and has not yet been satisfied. In addition, at the time of the November 2023 monitoring visit, several vehicles were at the garage, sometimes for a long and/or repetitive time, which following discussions with different E&S teams indicated an overall degradation of the vehicles' conditions.	The IESC recommends that CBG undertakes a supporting resource need analysis, in terms of e.g new vehicles, office spaces, considering the increased of the whole E&S team size.	Moderate	Open
June 2023_003	Stakeholder Engagement_Gender Issues	Poor gender awareness as evidenced by a grievance/lack of training to date.	CBG to work on a structured plan to raise awareness on gender issues within CBG and among contractors, through:	Moderate	<p>Open</p> <p>(No additional awareness raising activities undertaken; IFC Advisory</p>

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
			<ul style="list-style-type: none"> Continuing awareness raising events, also considering AJDEF’s recommendations; The involvement of CBG and Contractors’ male workforce in raising awareness initiatives 		training yet to be rolled out).
Dec 2022_002	Organizational capacity and competence - staff resources	The CR team remains unchanged since the previous IESC site visit [prior to Dec 2022] despite recruitment of new staff for the CR team is underway.	New personnel to be appointed as a matter of priority	Moderate	Open (new personnel appointed in 2023, yet delays are observed compared to CBG’s resourcing planning)
Dec 2022_004	Organizational capacity and competence - equipment resourcing	IsoMetrix full implementation has further delays recorded compared to the last IESC site visit	Regular use of IsoMetrix to start as a matter of priority.	Moderate	Open (despite progress on IsoMetrix and preliminary data onto the system, IsoMetrix has not yet fully implemented - though a IT project is underway for IsoMetrix customization)
Dec 2022_005	Organizational capacity and competence - equipment resourcing	CBG has experience long delays CBG in purchasing and receiving the required equipment.	CBG to regularly plan new equipment in combination with the use of the Sponsor / Champion approach in case of delays. Planning should include conservative timelines that consider past procurement delays. Also Ref. Oct 2021_008	Moderate	Open (although CBG has recently informed that a debottlenecking exercise has commenced and will be subject to further review)

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Dec 2022_008	Stakeholder Engagement	The 2022-2025 SEP is yet to be finalized and disclosed because it is subject to ongoing review by Lenders.	CBG (and Lenders) to ensure that the SEP is finalized and disclosed as a matter of urgency. In the interim, the previous version of the SEP should remain publicly available on CBG’s website.	Moderate	Open (SEP finalized; previous SEP confirmed online. Disclosure started though not yet finalized). <i>Post visit note: Closed in February 2024.</i>
Dec 2022_016	Community Grievance Mechanism	Current version of the grievance register does not keep track of how much time it takes to close grievance so to monitor deviation from the timeframe proposed in the grievance mechanism procedure (50 days). The grievance register should also keep track of all grievances which are now managed through the CAO mediation.	The Grievance register to keep track of grievances under CAO mediation.	Moderate	Open Grievances under CAO mediation needs to be better identified.)
March 2022_004	SEP and Grievance Management Mechanism	The 2022-25 SEP and GMM need to be revised by CBG as per the IESC’s/Policy Lenders remarks.	CBG to revise and update SEP and GMM as per the IESC’s remarks. <i>Post visits note: Draft SEP and GMM updated and near finalised.</i>	Moderate	Open for GMM only (SEP is finalized ; GMM is under minor revision) <i>Post visit note: Closed in February 2024.</i>
March 2021_006	NoCo Exploration	The exploration campaign affects a relatively large area and application of the LDP process to each annual drilling campaign means that the cumulative impact of the three drilling campaigns in all three plateaus over a three-year	Undertake a rapid cumulative E&S assessment of the exploration campaign, as if it were a single project, prior to the first E&S rapid impact appraisal. This cumulative assessment to focus on identifying and evaluating the key risks/mitigation measures	High	Open (Details of the studies to be undertaken for NoCo feasibility have to be shared with the IESC)

CBG BAUXITE MINE

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
		period is not factor in drilling campaign decision-making for each LDP.	to inform the individual LDP-level E&S rapid impact appraisals.		
Oct 2021_009	Female participation in stakeholder meetings	Since 2020, CBG has implemented actions to increase female attendance and participation in community-focused meetings. To date, success has been limited though insufficient time has passed to provide a definite conclusion.	Consider implementing one or more of the following options: <ol style="list-style-type: none"> 1. Identifying informal/formal female associations in the villages such as womens' farming/gardening groups and then organizing meetings; 2. Organizing meetings in the fields where groups of women may be working together (in rest periods and not interfering with work regimes); and Random walks in villages and to/from agricultural areas to engage in informal conversations with individuals or small groups of women	Moderate	Open (Still Valid - Focus Groups Discussions with women held though additional time and actions (e.g. on GBV-SH) are needed to close this finding)
Oct 2021_011	Grievance mechanism	Current planned training on the grievance mechanism is expected to occur in Q3 and Q4 of 2021. These dates are not aligned with the dates for finalization and dissemination of the SEP 2022 -2025	Enter into discussions with IFC Advisory to re-schedule the training 'Management of Grievance Mechanism' so that it is delivered at dates soon after the revised grievance mechanism is finalized and disseminated	Moderate	Open (IFC Advisory training delayed, however, GMM procedure finalised)
March 2021_008	Social Management Plans	Certain Plans were approved in early 2019 and have a 2-year review cycle (except for the Local Content Plan which is to be reviewed, "...as appropriate"). Given the challenges that have emerged in implementing the actions; these reviews provide an opportune moment for a comprehensive evaluation of the continuing relevance of all actions,	Unamended Plans to be reviewed and updated in line with the 2-year review cycle. In this context, the CR team to evaluate and amend the Plan actions and timescales, as necessary, considering both the results to date from implementing the existing actions and, also, emerging issues that necessitate adding new actions. The amended Plans	Moderate	Open

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
		especially, those actions that are continuous or on-going.	/Action Plans must identify priority time-critical actions.		
July 2020_007	Stakeholder Engagement Plan (SEP)	The SEP is dated 2016 and is time-bound (however, with a flexible date for revision/updating, “ <i>The SEP will be updated subsequent to completion of the phase 2 ESIA</i> ”). In line with the SEP expectation, it was revised to incorporate the MUOA Project in June 2020. Given that the SEP has been in force for almost 5 years, it is now necessary for an overall SEP revision/update to occur.	Revise/update and re-issue the SEP. This revised/updated SEP should be clearly time-bound (January 2022 to December 2025) and disclosed publicly.	Moderate	<p>Open</p> <p>(SEP for 2022-2025 finalized, disclosure among communities started in Dec 2023; summary to be posted on CBG’s website as part of the SEP disclosure)</p> <p><i>Post site visit note: SEP for 2022-2025 was approved and disclosed in February 2024</i></p> <p><i>Closed</i></p>

The ‘closed’ legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

6.9.3 PS1 Minor significance findings

Table 6-3 Summary of open minor significance Findings, PS1

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_SO_001	Support in customary practices	Observations made onsite have shown that the community engagement and the Social team’s adherence to customary practices such as petty cash, which are currently managed by each Social team member individually on their own money.	Based on observations made onsite, the IESC also recommends that CBG ensure possibilities for the Social team to access to petty cash to better support community engagement and the Social team’s adherence to customary practices. Possibilities to access to petty cash should be regulated through the implementation of a fast-track procedure that, if not already in place, should be developed in line with CBG policies and relevant internal procedures.	Minor	Open
Nov 2023_SOC_003	Grievance management	No updates on the progress of grievance management is observed in several grievances though recorded in early or in the middle of 2023 - e.g. January 2023 (1 grievance), in February (1 grievance), and in July (multiple grievances).	CBG to ensure that updates are provided on all the grievances within the community grievance register.	Minor	Open
June 2023_002	IsoMetrix	CBG to ensure that IsoMetrix becomes a tool to monitor appropriate implementation of relevant ESMPs (e.g. SEP, Grievance Management Plan) and workflow proposed therein. This includes reporting of KPIs.	Templates and monitoring system to reflect workflow and timelines included in relevant ESMPs	Minor	Open (IsoMetrix Customization is underway)

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Dec 2022_006	Organizational capacity and competence - training	The 2023 Training Plan does not contain provisions for a dedicated training session on Gender Based Violence and Sexual Harassment (GBVSH)	Training on Gender Based violence and Sexual Harassment to be included and provided as part of CR team's 2023 training plan	Minor	Open (Training through the IFC Advisory yet to be rolled-out).
Dec 2022_007	Organizational capacity and competence - training	Current version of the 2023 Training Plan targets the Social team only (i.e. CR and resettlement); no training on social matters is planned at present for colleagues from other departments.	Development of a programme for periodic, internally-led training and awareness-raising events targeting other departments is still required to align current practices with the requirements of the IFC Performance Standards (an ESAP requirement).	Minor	Open (training material under development, implementation and programme yet to occur)
Dec 2022_010	Stakeholder Engagement	At the moment no specific engagement with women to analyse issues related to GBV-SH have been undertaken.	In the time that training on GBV-SH is organized for relevant CR personnel, engagement with women on GBV- SH should occur via collaboration with a local, specialised NGO – in line with CBG's intention.	Minor	Open (Contract with ADJEF in place, event to sensitize CBG's female workforce organized; gender-sensitive consultation with communities to be organized)
Dec 2022_017	Community Grievance Mechanism	Grievance management related KPIs can be found in the updated (yet to be finalized) SEP and in the GMM procedure	CBG to ensure that all grievance management related KPIs are applied and monitored	Minor	Open (CBG is working on revising / finalizing KPIs pertaining to grievance management)
Dec 2022_020	Community Grievance Mechanism - Dolèances	The complaint (doléance) register should be improved to better keep track of the time it takes to manage communities' requests and to better inform about the doléance status.	Updated Doléance register	Minor	Open

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

7. PERFORMANCE STANDARD 2: LABOUR AND WORKING CONDITIONS

7.1 Introduction

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

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

Key findings are presented on each of these topics below.

7.2 Labour and working conditions (general observations)

Associated open finding(s)	New: Nov_2023_SO_004 Legacy: NA
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According to CBG, CBG provides 2,300 direct jobs and 3,000+ subcontractors' jobs.

During the November 2023 monitoring visit, the IESC met the HR Manager at the mine, appointed since February 2022, for a discussion of the worker grievance mechanism. From the discussion, the IESC understood that CBG do have a worker grievance mechanism procedure in place in line with CBG policy which has been conveyed to all workers, including subcontractors' workers via dedicated training, provided in 2023, with refresher planned to occur annually. Nonetheless, despite the training undertaken in 2023, workers do not use the grievance mechanism officially, as this would entail registration of complaints onto a dedicated online platform. While the HR Manager confirmed that workers tend to ask for meetings to express complaints or requests regularly, a correct implementation of CBG's worker grievance mechanism procedure is not occurring, and no formal worker grievance register exists to verify number and types of complaints received. From discussions held onsite, the IESC noted that at present informal discussions over grievances or requests between workers and HR Manager involves career related issues in terms of e.g. salaries, promotions. The IESC also understood that no informal grievances pertaining to other topics, from PPEs use, harassments and working conditions, have been raised and it is not clear to the IESC whether awareness raising activities exists on wider array of topics workers could potentially complain about.

Whilst it is understood that CBG is highly committed to high working standards and principles, a correct implementation of the worker grievance mechanism should occur, including a review of the procedure to identify and implement areas for improvements (i.e. encourage submission of grievances using the procedure, and capturing the grievances in a register). CBG should also carefully verify that relevant topics are presented to all workers, including subcontractors' workers, and that particular awareness campaigns are regularly made on the purpose of reminding that there will be no retaliation or discrimination against those that express grievances.

7.3 Identification of OHS risks and impacts

The risks and impacts identified during the November 2023 site visit to the Kamsar plant, CCF (“Centre de Contrôle Ferroviaire”: railway control centre room), railway (including contractor’s camps) and active mine are detailed below.

7.3.1 Kamsar plant

Performance Standard 2: Kamsar plant	
Associated open finding(s)	New: Nov 2023_HS_007 Legacy: June 2023_006, March 2022_008

On the Kamsar plant, the IESC observed poor working condition are caused by the generally poor condition of the building (tower TA10).

Employees of the contractor SOCANE in tower TA10 (arrival of conveyor C12) were observed working in very poor conditions due to exposure to dust and noise. The employee interviewed wore goggles and disposable dust masks, but it would be appropriate to check whether they wore the correct PPE given the level of dust in the building. Moreover, they didn’t wear hearing protection.

The following additional observations have been made:

- Steel sheets with a risk of fall.
- Emergency stop and protective casing not in place everywhere.
- Unlocked electrical cabinet.

It should be noted that at the closing meeting on site, CBG mentioned that this tower will be renovated in January 2024. However, there were workers in the building on the day of the IESC site visit, and it was where a worker was seriously injured on the finger (lost-time injury in September 2023). Immediate measures must therefore be taken to re-assess the risks in this building and in other buildings with the same activities:

- Dust and noise monitoring to define appropriate PPE and strengthen collective protection.
- Update the Job Safety Analysis regarding new PPE and collective protection.

7.3.2 Active Mine

Performance Standard 2: Sangarédi mine area	
Associated open finding(s)	New: NA Legacy: June 2023_006, March 2022_008

In November 2023, IESC interviewed security guards and, overall, the situation has changed since the last visit in June 2023 (see section 7.6):

- Improvement of the safety culture of security guards interviewed (they were wearing the correct PPE and mentioned they had attended HSE training courses).
- The IESC observed the installation of toilets at several security posts. CBG has started to install portable toilets. A company is permanently present at the mine to empty and clean the toilets.

This deployment must continue. However, IESC observed posts adjacent to haul roads intersections where only one toilet had been installed on one side of the intersection. One of the security guards therefore always crossing the haul road for basic needs.

Furthermore, IESC also observed that security guards were always posted at “official intersection” (which are equipped with barriers), but there are many haul roads and intersections with community roads where there are no guards/barriers or road signs.

Additional recommendations are included in section 8.6.

7.3.3 CCF and Railway

Performance Standard 2: Along the railway	
Associated open finding(s)	New: Nov 2023_HS_002, Nov 2023_HS_003 Legacy: June 2023_012, Dec 2022_025, March 2022_023

The MUOA project includes the new WABTEC system (onboard signalization and switch automation) which was due to be implemented by the end of 2023. It is now planned to be commissioned at the end of March 2024. With WABTEC automation, railway traffic will be managed fully from the CCF (“Centre de Contrôle Ferroviaire”: railway control center room).

CCF

In November 2023, IESC interviewed the train drivers and visited the CCF. Waiting for WABTEC to be implemented, old procedures based on communication by radio are still in place.

The CCF manage the 135 km railway line between Sangarédi and Kamsar. There are about 22 trains a day running on the railway, all operated by CBG on behalf of the other operators. There are also two marshalling yards that are not managed by the CCF, but instead are managed directly on site by local teams. Around 180 people work for the CCF (CBG staff and contractors: radio controllers (2 regulators and 1 supervisor), train drivers, switchmen, gatekeepers, flagmen, etc.).

The radio controllers work 8 hours shifts in order to follow the trains 24/7. There are currently 14 radio regulators. The handover between two controllers is done by following a specific procedure and each controller has its own user access on the train dispatch software.

All radio communications are recorded. The controllers hear all communications on the line:

- the train drivers regularly give their location and people working along the line must also communicate information (location and condition of the train);
- they have to complete the procedures (forms) dictated by the train drivers: preparing their authorization to proceed before leaving (form completed at the same time by the controller and the train driver);
- Communications between the various stakeholders involved during work on and near railway lines (construction company, switchman, train drivers, etc.).

In addition, "dragging parts" detectors (also used to detect derailments) are installed all along the railway. These detectors transmit an audible message on the same radio if they detect any dragging parts. They cut off any conversations in progress on the radio. Today, this is the only automatic equipment on the line. Following the derailment of a train in September 2023, one of the actions identified in the root cause analysis is to increase the number of these detectors on the line (see section 7.7).

Trains are equipped with a black box that records all the data relating to the journey (this data is particularly important in the context of an accident).

The train drivers are divided between drivers on the railway line and those at the two marshalling yards. On average, the drivers have between 15- and 25-years' experience and attend annual training and refresher courses. They always work in a team of two. CBG drivers operate CBG, GAC and COBAD trains.

On their journey from Kamsar to Sangarédi, the drivers work without a break, regardless of day or night. Under normal conditions, the round trip (thus the work shift) should take 12 hours, but several factors contribute to increasing this journey time:

- reduced speed on certain sections because the railway is in poor condition and to reduce the risk of community fatalities.
- overall reduction in the speed of the train if it is overloaded or incorrectly loaded, or if the weighbridge or the downloading grapple are out of order (which happens regularly).
- work zone with traffic disruption.

According to the drivers interviewed, journeys can last until 17 hours or even 20 hours. The rule is that they do not work the next day if a journey has lasted more than 16 hours.

Following those observations, the IESC recommends that:

- As all railway safety-related communication will be based almost exclusively on radio for several months to come, emergency drills need to be conducted to test all workers' behavior and test radio communication. These drills could be used to determine and test radio alert codes.
- Working conditions for train drivers should be improved (with the possibility to take a break during journeys) and journey times should not regularly exceed 12 hours for each worker, regardless of the reason for a longer journey.

Furthermore, the situation has not changed much since December 2022: switchmen (*aiguilleurs*) are still needed. Switchmen communicate with CCF by radio and flagmen (*hommes piquets*) positioned along the railway line to improve community safety communicate by radio or mobile phone (one radio for two flagmen). The watchmen of the "dragging parts" detectors (also positioned along the railway) communicate by mobile phone. In addition to this process, a car (with alarm and flashing light) continues to lead the train throughout its journey to announce its arrival. The car travels on the road parallel to the railway when the road is close to the railway.

Railway contractor's camps

The upgrade of the railway between Sangarédi and Kamsar involves building contractor's camps to accommodate for workers. In November 2023, the IESC visited the Tinguilinta and Boké camps of the Chinese contractor CRCC (see section 7.6). The Tinguilinta camp was being set up and will be able to accommodate 200 workers however the date for full occupancy isn't clearly defined (on the day of the visit, there were around 30 people). However, the following observations were made:

- There were no fire extinguishers or smoke detectors in the rooms visited.
- There were reachable and exposed electrical wires.
- No air conditioning in the kitchen.
- CBG's HSE team had not inspected the camp during this setting-up phase.

The Boké camp of contractor CRCC was also visited by the IESC. This camp is operational and in better condition than the Tinguilinta camp. The day of the visit, it was accommodating around 300 workers with a maximum capacity of 600 workers. During the camp visit, the IESC noted the golden rules displayed in French and Chinese, the presence of a watchman to control entry and exit from the camp, two occupational physicians in the infirmary for Chinese workers (there is a medical dispensary close to the camp for Guinean workers). However, the IESC observed there were no smoke detector in the rooms visited and some safety displays (e.g. fire extinguisher labels) were only in Chinese, even though Guineans are also present in the camp.

Next to the camp, the IESC visited the CRCC workshops. Many positive aspects were identified in this area, such as the holding of the “Toolbox meeting” in the mornings, contractor personnel interviewed were wearing the correct PPE.

7.4 OHS system

7.4.1 Integrated Management System and ASI Certification

Performance Standard 2: Integrated Management System and ASI Certification	
Associated open finding(s)	New: NA Legacy: Dec 2022_025

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

This initiative represents an improvement in safety management. Nevertheless, this new organisation has not yet filled the gaps in the tracking of the action plans and management plans (the Appendix 3 on ESAP items).

7.4.2 Documentation process and Contractor Management Plan

Performance Standard 2: Documentation process and Contractor Management Plan	
Associated open finding(s)	New: Nov 2023_HS_004, Nov 2023_HS_008 Legacy: NA

After two years' work, CBG succeeded in developing and deploying a new Contractor Management Plan (CMP) through the establishment of a committee involving the H&S, HR, procurement and legal departments. In November 2023, the actions pertaining to the CMP were fully completed (100%).

The H&S requirements in the new CMP include the EHS Guidelines and are aligned to the levels of each contractor category. Since June 2023, the final stages missing in the process (stages 8 inspection and 9 post-evaluation) have been deployed. The CBG is still looking to recruit a CMP coordinator. Pending recruitment, the CBG has appointed an acting manager.

In November 2023, the key figures regarding CBG's management of contractors were as follows:

- 50 active contractors in 2023 (including contractors met during the IESC site visit in November 2023)
- 35 visits and inspections performed in 2023 (including initial visits and additional inspections)
- More than 100 actions/non-compliances in process

The aim of the 2023 visits is to check that the H&S inductions have been performed and understood. Random H&S checks are also carried out. The purpose of the additional inspections is to check H&S critical risks, training and staff qualifications. During these inspections, the CMP manager has the authority to stop the work if the contractor doesn't comply with the rules. According to the CMP visits and inspections also include checking the grievance register, however the contractors grievance register wasn't shown to the IESC, and the level of details in the inspection reports is

limited. The CMP acting manager noted that companies with existing trade unions were more advanced on these registers. Grievance management is discussed in Section 6.3.

The contractor inspection form should be improved to better specify the scope of the inspection (inspection of a task or inspection of an area or a contractor etc.) and thus better identify risks and non-compliances. The management of corrective actions and non-compliances still needs to be improved to rank contractors more accurately according to their level of performance (such that future efforts can be focused on the higher risk contractors). CBG should also ensure that sufficient information and training is provided to the required employees as relevant to their roles, in relation to the audit and inspection process (see finding and details in section 7.4.2). The Isometrix tool should soon help the CMP Manager to manage all the actions and thus evaluate and rank the contractors.

7.5 Organizational capacity and competency

7.5.1 OHS organization

Performance Standard 2: OHS organization	
Associated open finding(s)	New: Nov 2023_HS_004 Legacy: March 2022_007, March 2022_010

The OHS organization is detailed in section 7.5.1. The Sponsor/Champion/Officer organization is still in place and provides for the management, monitoring and tracking of H&S actions through inspections and audits. The various committees continue to manage this organization and still hold regular monitoring meetings (regulatory, weekly or monthly).

However, given the above (section 7.4.2) regarding the audit and inspection process for contractors, CBG should provide training for the staff required to strengthen the audit and inspection process. Indeed, the audit should have a clear objective and a significant component of the audit or inspection on site must be based on observations (focusing on installations, working practices and behaviors) and interviews (talking to operators, shift managers, maintenance personnel, contractors etc).

Furthermore, CBG often requests ALCOA's external experts (the last time was in July 2023) to assist in areas such as railway risk, electrical arcflash risk, maintenance and asset management (mobile machinery/equipment).

In July 2023, ALCOA’s audit highlighted that 100% of the corrective actions to be completed within 90 days from the 2021 audit had been completed. However, 93% of the corrective actions to be completed within 180 days had not been completed (12 actions are still in progress and should be closed in 2024). In July 2023, ALCOA also noted the following improvements:

- Improved incident management, incident investigations and root cause analysis
- Better monitoring of corrective actions (HSEC Committee)
- Involvement of all stakeholders
- Halco training and support for investigations after incidents

All these elements demonstrate that CBG is continuing to improve by mobilizing several types of internal (Management, technical/operational staff) and external resources (ALCOA and Rio Tinto experts, training company).

OHS Training

As previously identified in 2022 and 2023, there is still no system for tracking out-of-date certifications and training courses and the tool used to monitor training is basic, being based on a simple Excel table. Despite this, CBG continues to deploy its ambitious training plan each year and continues to include contractors in its own training management plan. The table below shows the training of employees and contractors in 2023.

N°	Training Modules	Number of Session	Number of Employees per Session	Number of Employees to Train per Module	Number of Days / Session	Total Number of Days per Module
1	Introduction to Occupational Health-Safety-Environment	8	15	120	3	24
2	Work in Closed or Confined Spaces	8	15	120	4	32
3	Work at Height	8	15	120	4	32
4	Consignment and Tagout	15	15	225	4	60
5	Assembly, Disassembly of Scaffoldings and Use of Harness	12	15	180	4	48
6	Conduct of Handling and Hoisting Operation	5	15	75	3	15
7	Training for Bridge Operators and Lifters	6	15	90	4	24
8	Certificate of Aptitude for Safe Operation (CACES) of Forklifts	3	15	45	4	12
9	Certificate of Aptitude for Safe Operation (CACES) of Cranes	3	15	45	4	12
10	Certificate of Aptitude for Safe Operation (CACES) of Aerial Work Platforms (PEMP)	3	15	45	4	12
11	Electrical Authorization Index 0	12	15	180	4	48
12	Electrical Authorization Index 1 & 2	12	15	180	4	48
13	Instructor Team Training, Development, and Certification	3	15	45	4	12
14	Training One Team on Incident and Accident Investigation Tools	5	15	75	4	20
	Total	103	210	1545	54	399

Figure 7-1: Training of employees and contractors

On the advice of Rio Tinto and ALCOA, CBG is implementing a strategy to identify and eliminate critical risks (= fatal risks). Training on critical risks was therefore provided to the HS teams and managers by experts from Rio Tinto and Alcoa. The top management (Directors) have not yet attended this training because they are still in process of attending the Dupond DSS+ training (safety leadership). The progress of the implementation of this strategy and training will be closely examined during the next site visit.

7.5.2 Leadership, Commitment and Accountability

Since 2022 the involvement of CBG's management is effective, notably with:

- the 2 steering committee meetings per month and the roles of the sponsors.
- The "Maintenance Operations Review Meeting" (also twice a month), regarding the management's commitment to H&S topics. This meeting is attended by the senior managers of the relevant divisions. These meetings demonstrate the involvement of the operational managers (management of action plans and monitoring of the progress of actions). At these meetings, a review is made of high-potential incidents (not only serious accidents).

In October 2023, the percentage of completion of corrective actions linked to high-potential incidents was as follows:

- 65/90 (72%) for the CFB ("Chemin de Fer de Boké": Boké railway company) division
- 4/6 for the Technical and Maintenance Division
- 4/6 for the port division
- 3/6 for the mine division

In addition, senior managers comply with their audit/inspection commitments and a H&S award system, available to all staff, was implemented by CBG.

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

7.6 Workers Engaged by Third Parties

Performance Standard 2: Workers Engaged by Third Parties	
Associated open finding(s)	New: Nov 2023_SO_005, Nov_2023_SO_004 Legacy: Oct 2021_016, March 2021_022, June 2023_010

H&S observations for subcontractors are already included in section 7.3 of this report. This section aims at making observation on the working conditions of third parties’ workers.

During the November 2023 site visit, the IESC visited two workers’ camps managed by the China Railway Construction Corporation (CRCC) in Tinguilinta and Boké (also discussed in section 7.6). At the Tinguilinta camps several non-compliances were observed, including presence of 12 beds in one container, lack of lockers and recreational facilities. Whilst the IESC understood through discussions held on site that the Tinguilinta camp was still under construction, with limited workers living at the camp at the time of the site visit, the camp was planned to be in operation the following week which the IESC considered as very limited time to ensure that a camp in those conditions is aligned to international standards. The IESC also visited the Boké camp, which was observed to be in line with IFC/EBRD’s guidance note Workers’ accommodation: processes and standards, including good cleaning conditions enough, sufficient space between beds, presence of lockers and recreational facilities. All in all, the IESC recommends that improvements in the conditions of the Tinguilinta camp and the facilities provided be made as a matter of priority and that consistency among workers camp be ensured.



Figure 7-2 Tinguilinta camps (photos taken during the November 2023 site visit)

The IESC understood that CBG is in the process of organizing audits on subcontractors’ workers in response to IESC previous recommendation. During the November 2023 monitoring visit, the IESC observed a Guard of Dragging Detector with a wooden tent (re)built by himself for the last 4 years, as a rest area. During a visit at the mine, the IESC also interviewed a security guard, contracted with local subcontractors and, while improvements were observed, the IESC still observed working

conditions in needs to be improved (no electricity, toilets installed in location imposing crossing of mine roads). Whilst CBG started conducting on-site inspections of the companies employing the security guards, these audits have been more focused on health and safety aspects and less on aspects related to labour and working conditions.

IESC’s recommendations on monitoring subcontractors are still valid, particularly: The Contractor Management Plan needs to be implemented as a matter of priority, with regular supervision of aspects relative to working conditions and human rights included in checklists and audits.

Additional recommendations on the worker grievance mechanism are included in Section 7.2.

7.7 Monitoring and review

7.7.1 Incident Investigations and Root Cause Analysis

Performance Standard 2: Incident Investigations and Root Cause Analysis	
Associated open finding(s)	Legacy: June 2023_012 New: Nov 2023_HS_005

This section focuses on the last major accident that occurred within the reporting period on 15 September 2023: derailment of train N°418 at PK18.4.

After this accident, investigations were conducted by the designated teams (CBG H&S teams and CFB operational teams) and the findings collated in an investigation report. The two main root causes identified in the investigation report are i) the wagon loading process, the process for checking/mitigation the weight of wagons, and ii) the railway condition. The adequacy of emergency warning systems, the lack of on-board derailment detection systems on wagons, the lack of weighing after the weight of wagons has been reduced, the increase in CBG and Multi-User (MU) rail traffic and the adequacy of the train inspections on departure from Sangarédi and by the train drivers were also considered in the investigation report. The actions and recommendations identified in the investigation report were completed on schedule or were in progress in November 2023.

During the site visit in November 2023, the IESC visited the CCF, interviewed train drivers (see section 7.3.3) and reviewed the investigation report. The following observations were made:

- CBG should include the investigation of trains and wagons’ condition.
- CBG should include the results of last railway inspection as part of the investigation of the PK18.4 incident.
- Recommendation n°4 of the investigation report (regarding communication between workers on or near the railway and the train drivers) has been identified as critical by the IESC during this and previous visits (findings Nov 2023_HS_002 and March 2022_023). Therefore, it must be included in the investigation report’s action table.

7.7.2 KPIs

The KPIs for 2022 and 2023 presented during the visit continue to be better than those for 2021 (see figure below). Events at the base of the pyramid are increasing, while events at the top are decreasing. From a more specific point of view, the recording of unsafe situations (demonstrating better awareness of unsafe conditions) has increased. This reflects the involvement of a greater number of workers and enables the HS team to work more on prevention.

Despite the railway related fatality (the collision between a train and a tamper leading to the crushing of Sotrac switchman, on March 2023 at PK99.9 – Gobire, was addressed in the June 2023 IESC’s report), the trend in HS indicators for 2023 is the same as for 2022.

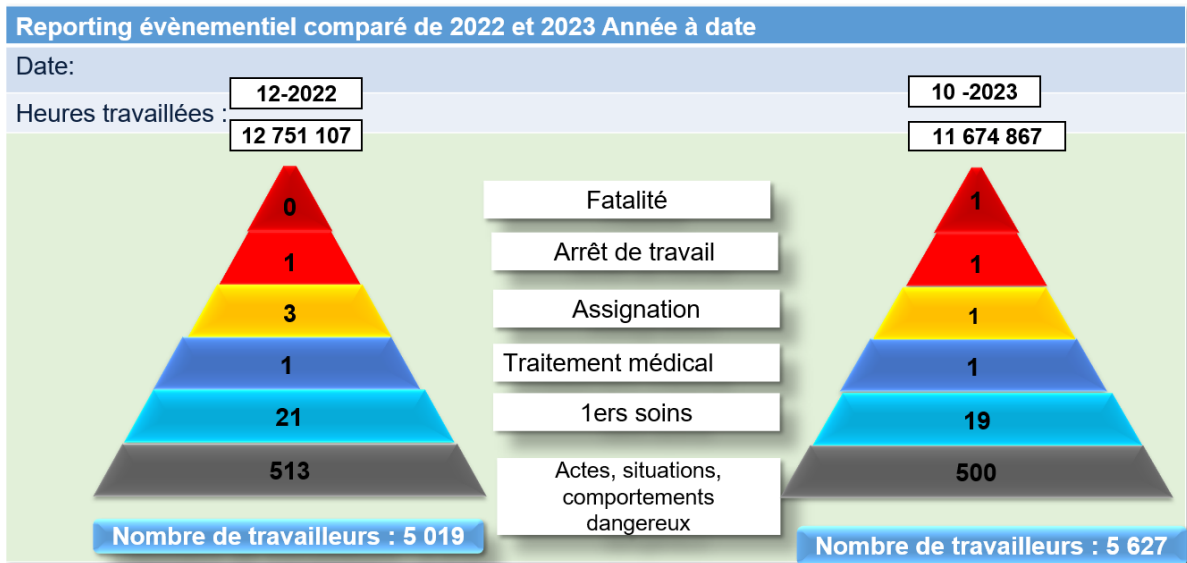


Figure 7-3: H&S KPIs 2022 and 2023 (through to October)

As a result, the TRIF/TRIFR (Total Recordable Incident Frequency/Rate) are continuing to decrease since 2021. CBG added other KPIs in its reporting: trend in incidents with a high potential for severity (actual or potential), contractors’ performance (TRIF/TRIFR), actions and inspections follow-up. These additional KPIs will help in the overall management of H&S performance and are welcomed by the IESC.

7.7.3 OHS Performance

Performance Standard 2: OHS Performance	
Associated open finding(s)	New: Nov 2023_HS_006 Legacy: NA

Significant efforts were noted during the November 2023 visit. The monitoring and review of KPIs has been improved in the last years. Thus, with a better vision of the situation and with the sharing of this situation with managers, all CBG teams are effectively progressing in the same direction to improve the safety culture.

The improvement of the tools (Sharepoint in particular) and the organization (Sponsor/Champion/Officer in particular) helped to make this change and enabled the H&S teams to be assigned more functional roles (management and evaluation of KPIs, on-site inspections, communication/sharing of KPIs, etc.).

The IESC’s recommendations in terms of system management and overall strategy have also been integrated to better assess H&S performance. Improvements in the strategic vision were observed in comparison to the 2022 situation:

- Addition of specific KPIs of contractors (in addition to KPIs for CBG employees)
- Sharing with management KPIs and action plans with completion percentages

However, one early observation consistently remains present: the time frame for completing certain actions is sometimes very long, especially when the actions result from large action plans (after a fatality or an external audit) or from management plans. The IESC notes that some actions remain open or in process for several years. CBG should review the Occupational Health and Safety Management Plan (the OHSMP) to better define the actions (H&S scope, time evolution) and ensure that they don't continue for several years. CBG should define measurable actions with shorter timeframes and be able to reformulate an action if necessary (if the context or situation changes). If, it ultimately no longer corresponds to the need, or if an action takes longer than expected, this may require a new temporary action, but this must be recorded and documented in the action plan.

This issue is particularly visible in the action plans regarding major incidents and the Rail Safety Management Plan:

- The Rail Safety Action Plan was not completed by the end of 2023 due to the delay in the installation of Betafence and the deployment of signalisation (Wabtec). The H&S consequences of this delay are that today switchmen and flagmen use radios or personal phones (no automatic communication) and that the CFB (Chemin de fer de Boké) is the division with the highest incident rate (such as the major incident in September 2023: train derailment)
- The action plans for the 2021 major incidents are fully or almost complete (note that electrical issues are included in the action plan following the ALCOA audit) and the 2023 action plans are in progress. However, CBG should review certain actions, as there are actions noted with deadlines up to December 2025.

Percentage of completion of incident related action plans in November 2023 is summarised below:

- Rail Safety Action Plan: 95% completed
- Action plans regarding major incidents
 - Electrical fatality (2021): 80% completed
 - Safety guard fatality (2021): 99% completed
 - Truck driver fatality (2021): 100% completed
 - Switchmen fatality (2023): 79% completed
 - Train derailment (2023): 50% completed
 - Finger (2023): 100% completed

7.8 PS2 Open findings

7.8.1 PS2 High significance findings

Table 7-1: Summary of open high significance Findings, PS2

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_HS_007	Risk Assessment at the Kamsar plant	Re-assess the risks in tower TA10 (arrival of conveyor C12) and in other buildings with the same activities	Dust and noise should be monitored to define appropriate PPE and strengthen collective protection Update the Job Safety Analyses regarding new PPE and collective protection in these buildings	High	Open
Nov 2023_HS_002	Working conditions of the train drivers	In addition to the issues of signalling and communication between workers on or near the railway lines (June 2023_012 and Dec 2022_025), the working conditions of train drivers should be improved.	Train drivers should be able to take a break during their journeys and journey times should not exceed 12 hours Emergency drills need to be conducted to test all workers' behaviour and test radio communication. These drills could be used to determine and test radio alert codes	High	Open
Nov 2023_HS_005	Monitoring and review	Incident Investigations and Root Cause Analysis after the last major accident that occurred on 15 September 2023: derailment of train N°418 at PK18.4.	CBG should investigate the trains and wagons' condition. CBG should include the results of last railway inspection as part of the investigation of the PK18.4 incident (the investigation report of the incident doesn't specify the date or the aspects checked during the last inspection on PK18.4). Recommendation n°4 of the report (regarding communication between workers on or near the	High	Open

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
			railway and the train drivers) should be examined in more detail and moved to actions table. This point is little detailed, although it was identified as critical by the IESC during this and previous visits (findings Nov 2023_HS_002 and March 2022_023).		
Nov 2023_SO_005	Workers Engaged by Third Parties_Worker camp	At the Tinguilinta camps several non-compliances were observed, including presence of 12 beds in one container, lack of lockers, and recreational facilities.	Improvements in the conditions of the Tinguilinta camp and the facilities provided be made as a matter of priority, in line with IFC/EBRD Guidance note Workers’ accommodation: processes and standards.	High	Open
June 2023_012	Monitoring and review	Incident Investigations and Root Cause Analysis	<ul style="list-style-type: none"> • Close all outstanding actions relating to the fatality • Last railway fatality: <ul style="list-style-type: none"> ○ Define methods for sharing H&S information between workers (shift changes) ○ clarify and test the feasibility of the new distance required between the track and the switchmen or flagmen ○ Strengthen the communication between the CCF and all workers (switchmen and flagmen) in the vicinity of the railway track ○ A specific action plan should be prepared and discussed with all stakeholders using and working on the railway 	High	Open (A new automation system is being implemented and training has been provided but the working conditions are the same)

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
June 2023_010	Workers Engaged by Third Parties_Contract or Management		A rapid audit of working conditions of security guards (and other local contractors) is to be conducted as a priority to verify any non-compliances/opportunities for improvements in terms of labour and working conditions	High	Open (While Inspections have started, these have been mostly focused on HSE aspects; assessment of labour and working conditions and human rights as per the CMP are still required.)
Dec 2022_025	OHS system	Lack of follow-up to the multiple action plan(s) may result in the reoccurrence of similar serious events (fatalities, fatigue and maintenance management)	<p>Mine haul roads:</p> <ul style="list-style-type: none"> ○ Include the road sections intended for communities in the traffic management plan (manage road signs and guard to discourage continued use of haul roads). ○ Improve the working conditions of guards and control the application of CBG rules by contractors. <p>Mine control centre (PCC):</p> <ul style="list-style-type: none"> ○ Decide on the effectiveness of the facial recognition devices for deployment to all vehicles or to investigate an alternative device. ○ Considering a way to control of drivers' schedules and break times between shifts. 	High (Moderate in isolation and High collectively)	Open (However, corrective actions on Mine haul roads are ongoing. The IESC will visit the PCC during the next site visit).
March 2022_008	Risk Management and Control of Work	Low control of OHS risks during the execution of tasks, as confirmed by numerous findings during site visits (including in relation	<ul style="list-style-type: none"> • Blasting operation: An official and more-structured control system (including a checklist for the contractor and checklist for CBG) should be established for use before and after blasting and kept on site. CBG need to confirm that all personnel present 	High	Open/ Ongoing (to be assessed in next IESC visit)

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
		to blasting operations, surface miner, traffic on the mine, railway, waste storage (Torabora), lifting operation on jetty, Kamsar Plant)	<p>at the mine are aware before validating the blasting.</p> <ul style="list-style-type: none"> • Traffic on mine: Physical separations between community traffic lanes and mine haul roads need to be provided whilst clear markings/signs, informing individuals of the danger and prohibition to cross, need to be established/installed. Road signs for mine trucks need to be reinforced and a way to improve drivers’ knowledge of the traffic plan needs to be identified and implemented. • Kamsar Plant: CBG should complete operational procedures where these are missing, such as for the BuMS. As well as prepare baseline operational risk assessments, prepare a risk register and communicate these to all personnel (both direct employees and contractors). The MUOA Project risk register should also be updated. <p>CBG should prioritise completing a man-machine interface risk assessment and implement appropriate engineering and administrative controls to achieve safe segregation of pedestrians and mobile machinery/equipment at Kamsar and Sangarédi.</p>		
March 2022_010	Maintenance & Asset Management	Poor maintenance of equipment (safety technologies upgraded slowly).	CBG should review maintenance and asset integrity in detail (including electrical installation and moving/rotating equipment).	High	Open/ Ongoing The IESC does acknowledge significant progress in the planned maintenance/repair of the

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
					Dryers following a comprehensive external audit of these assets in 2022/early 2023.

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

7.8.2 PS2 Moderate significance findings

Table 7-2 Summary of open moderate significance Findings, PS2

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_HS_003	Risks and impacts	Numerous findings from railway contractor’s camps (CRCC)	<p>The Tinguilinta camp:</p> <ul style="list-style-type: none"> • No fire extinguishers or smoke detector in the rooms visited • Accessible and exposed electrical wires • No air conditioning in the kitchen. • CBG’s HSE team had not inspected the camp during this setting-up phase. <p>The Boké camp</p> <ul style="list-style-type: none"> • No smoke detector in the rooms visited • Some safety displays (e.g. fire extinguisher labels) were only in Chinese, even though Guineans are also present in the camp. 	Moderate	Open
Nov_2023_SO_004	Worker Grievance Mechanism	Despite the training undertaken in 2023, workers do not use the grievance mechanism officially. While workers tend to ask for meetings to express complaints or requests regularly, a correct implementation of CBG’s worker grievance mechanism procedure is not occurring, and no formal worker grievance register exists	<p>A correct implementation of the worker grievance mechanism should occur:</p> <p>CBG to analyse reasons for the poor implementation of the worker grievance mechanism and verify needs for update of the worker grievance mechanism procedure.</p> <p>CBG should also carefully verify that relevant topics are presented to all workers, including</p>	Moderate	Open

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
		to verify number and types of complaints received.	subcontractors’ workers, and that particular sensitization is regularly made on the purpose of reminding that there will be no retaliation or discrimination against those that express grievances.		
Nov 2023_HS_008	OHS organization	Provide training for the staff required to strengthen the audit and inspection process.	CBG should ensure that sufficient training is provided to the required employees as relevant to their roles, in relation to the audit and inspection process. The training should cover the scope of the on site audit or inspection and focus on the observation and interview approach.	Moderate	Open
Nov 2023_HS_004	Contractor Management Plan	Rank contractors more accurately according to their level of performance (such that future efforts can be focused on the higher risk contractors).	<ul style="list-style-type: none"> • Improve the contractor inspection form to include: <ul style="list-style-type: none"> ○ the scope of the inspection (a task or an area or a contractor) and thus better identify risks and non-compliances ○ a check of the grievance register • Improve the management of corrective actions and non-compliances • CBG to further verify training on Security and Human Rights provided to security guards 	Moderate	Open
Nov 2023_HS_006	OHS performance	Update the OHSMP to improve the time to completion of certain actions	CBG should review the Occupational Health and Safety Management Plan (the OHSMP) to better define the actions (H&S scope, time evolution) and ensure that they don't continue for several years. CBG should define more concrete and shorter deadlines and be able to	Moderate	Open

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
			reformulate an action if necessary (if the context or situation changes). If, it ultimately no longer corresponds to the need, or if an action takes longer than expected, this may require a new temporary action, but this must be recorded and documented in the action plan.		
June 2023_006	Risks and impacts	Numerous findings from Kamsar plant (waste storage workplace, Conveyor project) and active mine (heavy vehicles workshops)	<ul style="list-style-type: none"> • Waste storage workplace (Tora Bora) <ul style="list-style-type: none"> ○ Check the emergency kit on site and add fire blanket ○ Managed incinerator when is opened to cool down • Conveyor project <ul style="list-style-type: none"> ○ Add slings to the list of lifting equipment daily inspected ○ Improve and communicate the location of the assembly point ○ Check whether employees are aware of the excavation risks • Heavy vehicles workshops <ul style="list-style-type: none"> ○ Clarify the strategy for the CBG Take5 booklet ○ Perform an H&S inspection to identify risks ○ Sharing and raising awareness all employees of the rules regarding lifting equipment 	Moderate	Open (understood to be work in progress - to be assessed in next IESC visit)
March 2022_007	OHS Training	The training management tool is not adapted to CBG; there is no system for	<ul style="list-style-type: none"> • Training management – Establish an appropriate system or more efficient 	Moderate	Open

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
		<p>tracking out-of-date certifications and training courses and the tool used to monitor training is too basic.</p> <p>There is no formal verification of trainees' understanding at the end of safety induction training.</p>	<p>tool (e.g. automatic reminders for refresher training, tracking out-of-date certifications, list of employees eligible for training based on roles). This will ensure that only personnel with up-to-date certification and training are assigned to perform critical operational and maintenance tasks.</p> <p>The training plan should include specific training for OHS teams and for Managers.</p>		<p>(OHS Training will be integrated on the IsoMetrix database ; The Golden Rules are included in the safety induction)</p>
<p>March 2022_023</p>	<p>Hommes Piquets</p>	<p>Based on the IESC’s impromptu meetings with Hommes Piquets it was found that lacked information and authority to perform their duties, including:</p> <ul style="list-style-type: none"> • No train timetable • No means or authority to stop the train in an emergency situation • Poor understanding of their own risks 	<p>CBG should use an official and more-structured control system for rail activities. CBG need to confirm that all personnel present along the railway are aware before the passage of trains. Kilometre posts need to be installed, alongside railway signs for the communities, and a way to communicate the train schedule to the hommes piquet needs to be identified and implemented.</p> <p>All hommes piquet should be issued with VHF radio/other means of communication such that they can communicate with the train driver. Training in Railway Safety Communications Procedures, as prescribed in the Road and Rail Safety Management Plan, should be provided.</p>	<p>Moderate</p>	<p>Open</p> <p>(A new automation system is being implemented and training has been provided but the working conditions are the same)</p>
<p>March 2021_022</p>	<p>Integration of LWC requirements in bid evaluation</p>	<p>Currently, there is no clearly defined role or pathway by which the HR Department can provide its expertise to ensure that LWC requirements are:</p>	<p>CBG to ensure that:</p> <ul style="list-style-type: none"> • The bid evaluation process is amended so that the HR Department receives all bids in advance of 	<p>Moderate</p>	<p>Open</p>

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
	and contractor management	<ul style="list-style-type: none"> • Considered in the bid evaluations and contractor selection process, especially structured participation in the Evaluation Committee; • Presented in future reviews and potential changes to the 'Minimum Requirements' (and therefore included with RfPs); and <p>Integrated into the design and implementation of a monitoring/auditing process, focused upon contractor performance, plus inputs to corrective actions and judgements on 'close out'.</p>	<p>Evaluation Committee meetings, participates in the Evaluation Committee meetings and is a signatory to the Committee's decision/s;</p> <ul style="list-style-type: none"> • HR Department to designate a senior staff member to receive PS2 training to assist it fulfil its role in both the contractor selection process and subsequent contractor management (latter issue to be examined in the next IESC site visit); • All requirements to be placed on contractors to be consolidated into the Contractor Management Plan at the next review and revision of this Plan (with removal of LWC provisions from the Local Content Plan); and <p>The HR Manual, WGM and Code of Ethics to be provided in all RfPs.</p>		(Not assessed – to be assessed in next IESC visit, however downrated to moderate as the LWC should already be part of the contractor management plan)
Oct 2021_016	Management of suppliers	The roll-out of LWC requirements does not yet extend to suppliers	Design of an action programme to apply the relevant PS2 requirements to CBG's suppliers (those that fall into the definition of a contractor as presented in PS2)	Moderate	Open

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

7.8.3 PS2 Minor significance findings

There are no open minor findings for PS2 on this site visit.

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

8. PERFORMANCE STANDARD 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

8.1 Introduction

CBG’s progress in the implementation of various environmental management plans and, specifically, action plans embedded within the management plans, is described in this chapter. The plans considered are as follows: environmental monitoring, dredging, air quality, water quality, noise and vibration, use of resources and energy efficiency and waste management.

8.2 Environmental Monitoring

The June 2023 IESC Monitoring Report highlighted the following areas of progress:

- Significant increase of environmental monitoring performed thanks to the increased capacity of the environmental monitoring team (5 additional people);
- Environmental samples testing contracted with laboratories and new water quality testing equipment received;
- No NO_x and SO_x monitored at the air quality monitoring station in Kamsar due to equipment malfunctions;
- Information related to environmental monitoring (i.e. results from testing or sampling) and all environmental management plans available to all environmental teams at CBG on a sharepoint;
- Information on environmental monitoring results not yet disclosed to the communities.

According to CBG and as of November 2023, the status is as follows:

- 100% environmental monitoring performed (except from the air quality fixed station in Kamsar) due to the increased capacity of the environmental monitoring team (1 additional person since June 2023);
- Similarly to the situation in June 2023, ambient air quality is not monitored at the fixed air quality monitoring station in Kamsar due to equipment malfunctions (however mobile stations are operational);
- Information on environmental monitoring results has been disclosed to the communities, following the participatory monitoring procedure.

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

8.2.1 Environmental Monitoring Programme

Performance Standard 3: Environmental Monitoring Programme	
Associated open finding(s)	New: Nov 2023_EN_005 (mentioned in PS1) Legacy: NA

CBG has made significant progress to meet the expectations of the 2019 Environmental Monitoring Programme (EMoP), leading to collection of 100% of the planned environmental samples in October 2023 (excluding the fixed air monitoring station in Kamsar).

In addition, as CBG mining activities grow on other plateaus, it is crucial that the EMoP is adjusted to include new measurement locations. For instance, the EMoP doesn't list the new basins' outlets for water quality monitoring. The update of the EMoP can be performed during the structured review of current EMPs mentioned in PS1.

8.2.2 Environmental monitoring database

All environmental management plans, results from the environmental monitoring, and other environmental related documentation (such as the presentations given during the ASI and IESC audits) are now available on a SharePoint and accessible to the CBG environmental team. As mentioned in the PS1 section, IsoMetrix isn't implemented for environmental monitoring results yet. No deadline for its use with environmental data was provided, however CBG currently uses a Sharepoint document repository for its environmental data. The Sharepoint has been observed to work and to be used by most CBG employees interviewed during the visit.

8.2.3 Disclosure of Monitoring Results

Performance Standard 3: Disclosure of Monitoring Results	
Associated open finding(s)	New: NA Legacy: Dec 2022_013 (mentioned in PS1)

The IESC previously reported CBG's commitment within its management plans to disclose the results of its environmental monitoring to the affected communities and that a protocol for disclosure of environmental monitoring results was scheduled for finalisation in June 2022. In June 2023, the protocol for disclosure of water monitoring results was under review, and the IESC urged CBG to implement the procedure and communicate on the community well water quality results in an appropriate non-technical manner. Indeed, during the IESC discussion with the community in Fassaly Foutabhé in June 2023, some inhabitants expressed their concerns over the water quality of the CBG wells, although most of them seemed satisfied with the overall water taste and pump functioning and flow. CBG indicated that water quality results had been shared with communities, however CBG was unable to provide documentary evidence.

8.3 Water Quality

Water management was identified as a focus area for the June 2023 monitoring visit, when the IESC visited the domestic wastewater facilities in Kamsar and Sangarédi, the industrial wastewater treatment at the tank farm (Kamsar), the Cogon drinking water plant in Sangarédi, sedimentation ponds built in 2020 located upstream from Fassaly Foutabhé village. In June 2023, the IESC environmental and resettlement specialists also met with members from the Fassaly Foutabhé village. In November 2023, water management was again a focus area for the site visit, with visits to future surface water management infrastructure in Sangarédi and surface water outlets and lakes (used for dust management) in Kamsar. The IESC environmental specialist was also able to meet with community members from the village of Fassaly Belendéré, SNAPE's¹¹ representative, and the Ministry of Water and Forest. These visits and engagements provided information relevant to a number of priority areas as follows:

- Implementation of Water Management Plan – general status;
- Surface water drainage at Kamsar port;

¹¹ SNAPE - Service National des Points d'Eau de Guinée / Guinea's National Water Points Service

- Surface water management infrastructure at Sangarédi;
- Surface water status with the Ministry of Water and Forest;
- Community Water resources at Fassaly Belendéré.
- Community water resources management with SNAPE

8.3.1 Water Management Plan – status of implementation

The figure below shows planned progress against actual progress in implementing actions within the Water Management Plan as of Q4, 2023. Significant progress was made since the June 2023 site visit (from 77% completion to 97%), and the action plan is almost completed.

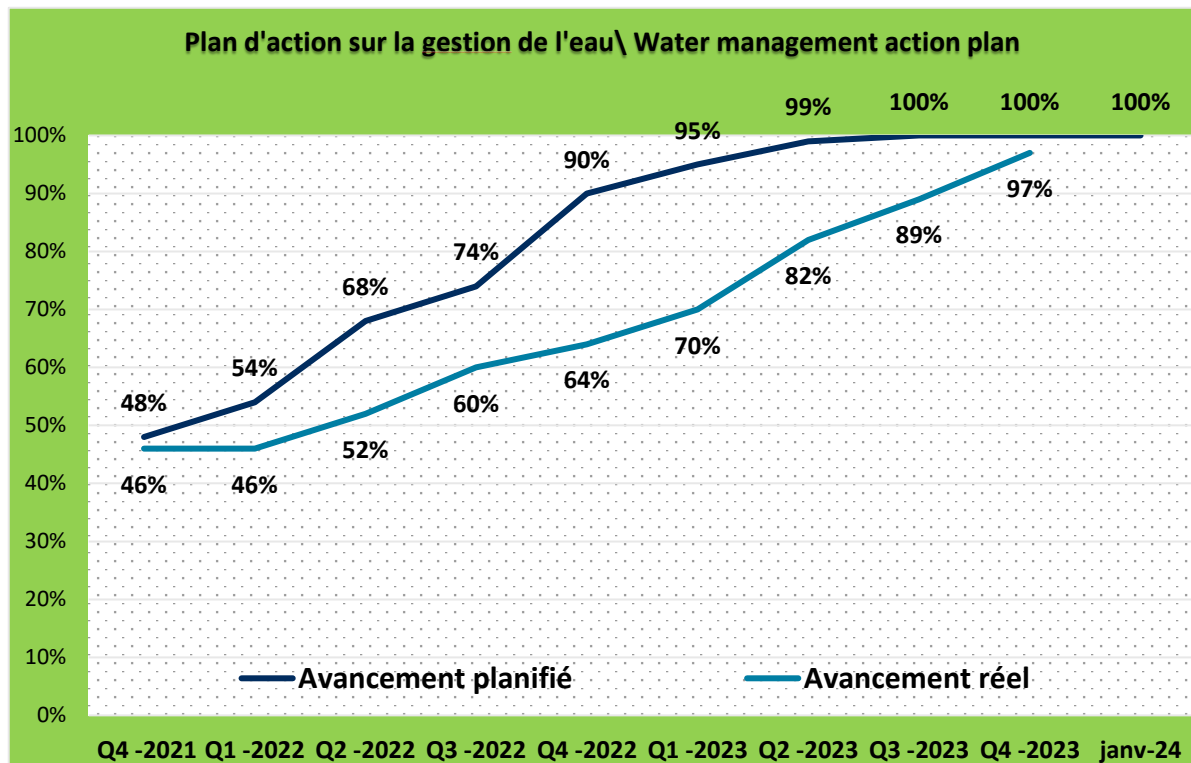


Figure 8-1: Status of Water Management Action Plan implementation (as of end November 2023)

Although steps to close the remaining actions are ongoing, the 3% remaining actions from the WMP will unlikely be completed by the end of January 2024.

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

8.3.2 Surface water drainage at Kamsar

Performance Standard 3: Surface water drainage at Kamsar	
Associated open finding(s)	New: Nov 2023_EN_014, Legacy:, Dec 2022_031

Surface water quality

The surface water flowing onto the Kamsar site is collected through a system of drains, which subsequently flow into the sea (12 surface water exit points to the sea). These exit points include

the 'Grand Canal' and the industrial wastewater outlet (where the oil/water separator unit is installed).

The 'Grand Canal' or 'Grand Caniveau Central' (located east from the bauxite stockpiles) gathers surface waters flowing from the stockpiles (see picture below). The IESC March 2022 report mentions that elevated COD levels and suspended sediments were recorded in surface river water surrounding the Kamsar processing facility, and that surface water discharge channels (fed by dewatering of the primary crusher pit) were heavily laden with fine sediments and were observed discharging to the River Dougoufisa with no sediment trap in place. Despite CBG's efforts to maintain the drainage system, half the suspended materials measured at the surface water monitoring points in late May - early June 2023 were higher than the limits specified in the EMoP (dated 2022). The last campaigns (on the 20th November and the 6th December 2023) show a total iron concentration at least 60 times higher than the limit, and a very acidic pH (around 3). CBG dredges the Grand Canal and the surface water drains twice a year: once after the rainy season and once during the dry season. During the November site visit, the IESC observed dredging at the Grand Canal (see second picture below). The monitoring results suggest that the dredging campaign helps reduce the discharge of sediments (suspended material on 20th November 2023 was 11 times higher than thresholds, while suspended materials on 6th December 2023 (thus after dredging) is below the limit). The sampling point 'Club Nautique' results from 20th November 2023 show a total iron content higher than the limit. The results communicated for other outlets (101, 104 and 102) are compliant.

To lower the surface water sediment content to an acceptable level, CBG must continue its efforts to reduce the overall emissions of dust at the Kamsar site, in accordance with the air quality requirements (see section 8.5) and improve management of surface water runoff through the installation of sediment traps prior to discharge of surface waters to the sea. The reduction of emissions, including fugitive emissions and implementation of the maintenance actions for the surface water drainage in Kamsar are both required to improve the situation.



Figure 8-2 The 'Grand Canal'



Figure 8-3: 'Grand Canal' (looking upstream) during cleaning (crane)

Grand Canal rehabilitation

The 'grand canal' (which collects most of the surface water from the Kamsar site), shows signs of aging and needs to be rehabilitated. Since the last site visit, the technical specifications and plans for the canal rehabilitation were finalized. The terms of reference for the work completion were under validation at the time of the site visit. No timeline for the Grand Canal rehabilitation was

communicated, but it is unlikely to happen by the end of January 2024. It is recommended that a clear timebound plan be developed and the timeframes fed into a revised forecast and communicated to lenders.

Surface water drainage capacity

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

A number of preliminary designs were shared with the IESC, however these have been dismissed by CBG. Consequently, CBG engineering team revisited the drainage design following the IESC’s December 2022 site visit and determined that only 1 drain must be upgraded to meet the required capacity for a Probable Maximum Precipitation (PMP) event of 1:100-year flood event. The results from the work performed by CBG engineering team will be shared with CBG management, which will decide on the actions to be undertaken. The December 2022 site visit report mentioned that the initial intention was to undertake any necessary upgrade works by the end of 2023. This target date is no longer achievable, although CBG reported the contract with a contractor was about to be signed. It is unlikely the drain will be extended by the end of January 2024. It is recommended that a clear timebound plan be developed and the timeframes fed into a revised forecast and communicated to lenders.

8.3.3 Kamsar plant water usage and industrial wastewater treatment

Performance Standard 3: Water consumption and industrial wastewater treatment in Kamsar	
Associated open finding(s)	New: NA Legacy: June 2023_015

Oil/Water Separator at the industrial wastewater outlet

The installation of a Dissolved Air Flotation (DAF) system in early 2023 has significantly reduced concentrations of oil in water discharged via the industrial wastewater outfall. Following a period of operational adjustment, the discharge of treated effluent from the oil/water separator no longer exceeds the Guinean (50mg/l) nor the IFC’s (10mg/l) oil-in-water limits. The DAF has been effective in meeting the Project’s applicable discharge limit during dry and rainy seasons. In September 2023, CBG proposed to use the DAF unit as the permanent wastewater (oil) treatment solution and Lenders gave their consent.

CBG intends to procure a second DAF unit to further ensure backup treatment to meet the applicable standard at all times. No timeline has been given for the backup DAF unit. The IESC recommends a realistic timeframe be set to ensure continued compliance in the event that the current DAF unit should fail or requires planned shutdown for maintenance purposes.

Water usage and industrial wastewater reuse

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

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

8.3.4 Communities' water resources

Performance Standard 3: Communities' water resources	
Associated open finding(s)	New: Nov 2023_EN_004, Nov 2023_EN_008 Legacy: June 2023_016, Dec 2022_032, Oct 2021_022

Surface water – General considerations

During the site visit conducted by the IESC in November 2023, a comprehensive discussion transpired with a representative from the Ministry of Water and Forests. The Ministry is actively engaged in the reforestation of riverbanks and endeavours to enhance public awareness regarding this aspect. The representative acknowledged that mining activities in general exert adverse effects on the water quality of rivers and streams within the region. This impact is manifested through elevated sediment content and increased siltation of water bodies. The ramifications of such siltation include a reduction in water volume during dry periods and an excess of water in rivers during wet periods. Additionally, the rivers and streams in the area face further challenges due to diverse human activities, such as brick manufacturing. Consequently, cumulative impacts of various activities impact the surface waters in the region.

The representative from the Ministry noted that CBG maintains positive relations with the Ministry and demonstrates a willingness to collaborate in supporting the authorities in addressing these environmental concerns. Every 3 months, CBG meets with the communities and the Ministry and during these events CBG supports with the dredging of some rivers. CBG also punctually dredges specific rivers if they present a silting problem.

The information shared by the Ministry of Water and Forest resonates with the feedback of the Belendéré community. Indeed, during the gathering with Fassaly Belendéré community, community members mentioned 2 of the 3 streams historically used by the community are no longer usable due to siltation (Kewewol and Fassalywol streams), and they fear the rest of the rivers will be similarly impacted. They also observed a reduction in the number of fish in the streams. According to CBG, only the Fassalywol stream is impacted by siltation.

Drinking water - General considerations

CBG's mine operations have the potential to adversely impact communities' water resources. CBG's representative explained that CBG provides the funds for the drinking water boreholes construction, and SNAPE (National Water Supply Point Management Services) builds the boreholes.

During their site visit in November 2023, the IESC engaged in dialogue with a representative from SNAPE. SNAPE is a public service committed to ensuring access to drinking water through its regional entities. SNAPE responsibilities include the construction of boreholes, boreholes maintenance, and sensitisation of communities.

According to SNAPE's representative, SNAPE and CBG worked hand in hand for the construction and rehabilitation of boreholes in the past 2 years. CBG asked SNAPE to perform a diagnostic assessment (mentioned in the previous site visit report) on the water boreholes on the Sangarédi prefecture (including 13 villages). At SNAPE's suggestion, the scope of the audit was expanded to include the adjacent prefecture which features 56 villages. The assessment included an evaluation of the population's water needs vs water production, and an evaluation of the water boreholes. Following the diagnostic assessment recommendations, CBG performed:

- In 2022: Rehabilitated 38 boreholes and constructed 11 new ones;
- In 2023: Rehabilitated 6 boreholes and built 4 new ones.

In the 13 villages included in the stakeholder engagement process, every three months, a SNAPE representative is deployed to do routine borehole inspections and conduct sampling (for water quality testing). During the initial year, CBG pays for any maintenance and replacement costs. After that, the communities take ownership of the boreholes and cover the costs whenever maintenance is required. According to SNAPE, the water quality is deemed satisfactory. For the other villages (outside of the engagement process), the communities take the ownership of the boreholes following their construction.

Each community operates a dedicated bank account set aside specifically for borehole maintenance costs. At any given point, SNAPE is allowed unscheduled access to check the account's savings. SNAPE's representative assures that the communities don't struggle with maintaining their savings and reports of missed payments are virtually non-existent.

Although CBG is not responsible for maintenance of the boreholes, it is important CBG ensures strong liaison with SNAPE to be informed on the water quality and availability at the wells within the affected communities (for instance as part of the "Comité de gestion des forages" or boreholes committee). This will enhance CBG knowledge of the boreholes (water quality, quantity, condition etc.) and will allow for a prompt response from CBG in case communities face difficulties with their boreholes. CBG needs to develop a communication protocol with SNAPE regarding Communities' water resources monitoring and sharing of information.

Indeed, the international standards (PS1) mention that "While the client cannot control [...] government or third-party actions, an effective ESMS should identify the different entities involved and the roles they play, [...] and opportunities to collaborate with these third parties in order to help achieve environmental and social outcomes that are consistent with the Performance Standards". During the site visit, CBG representative confirmed CBG's commitment to ensuring the affected communities will be given access to drinking water.

The Fassaly Foutabhé case

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

- determine the cause for the stream's high turbidity levels;
- propose corrective actions.

CBG did not provide a specific date for the consultant's assessment and this will be closely followed up during the next site visit.

Drinking water at Fassaly Belendéré

Fassaly Belendéré is a village located in the 4 km East from Fassaly Foutabhé, on the Mbouroré plateau.

As previously indicated, the IESC met with the Fassaly Belendéré community during the site visit in November 2023, and had a discussion focusing on drinking water with the women of the village. The community relies on two boreholes, one constructed in 2002 and another in 2023, the latter

being financed by CBG. Villagers find the taste of the water from these boreholes satisfactory; however, they observe sediment deposits at the bottom of their water containers after an overnight storage. CBG representative mentioned neither CBG nor SNAPE monitor the water quality at the borehole.

The women elaborated on the water challenges, noting that the boreholes tend to run dry in April and May (at the peak of the dry season). In such instances, some members of the community dig makeshift wells near the river to secure a water supply during this period. As mentioned above, it is critical CBG ensures strong liaison with SNAPE to be informed on the water quality and availability at the wells within the affected communities. The IESC recommends CBG to investigate jointly with SNAPE on the water shortages, at Fassaly Belendéré and provide water to the community in case of foreseen shortages, while investigation on the cause of the water shortages is ongoing.

CBG drinking water treatment plants

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

The latest water monitoring results shared by CBG during the November 2023 site visit show high aluminium concentrations in the water produced by the Cogon (with 5 out of 7 sampling results higher than the 0.1 mg/L limit) and Batafong (sampling result in early November 2023 more than 3 times the limit, similar result for end November) drinking water stations. The high aluminium content in the water at the Cogon station was discussed with CBG during the December 2023 meeting, and it is mentioned in IESC previous reports and the Water Management Action Plan. Since June 2023, CBG uses the equipment received in June 2023 to fine tune the coagulant dose at the Cogon station, resulting in an aluminium content reduction of 2 mg/l. Nonetheless, the aluminium contents are still higher than the upper limit of 0.1 mg/L (WHO standard). In August 2023, an audit was performed by an external consultant and resulted in an action plan aiming to bring the Cogon plant to compliance. The implementation of the action plan is currently ongoing.

If the aluminium content in the Batafong remains high and if the equipment received and action plan at Cogon are useful for reduction of the aluminium content, the IESC will recommend CBG to install similar equipment and apply similar actions at the Batafong station to ensure compliance.

8.3.5 Surface water management at CBG site in Sangarédi

Performance Standard 3: Surface water management at CBG site in Sangarédi	
Associated open finding(s)	New: Nov 2023_EN_005 (mentioned in PS1), Nov 2023_EN_010 Legacy: NA

Results from monitoring data

The removal of the vegetation (stripping) associated with the mining activity causes the production of sediments which, if not managed properly, pollute surrounding surface waters during rainy events. CBG mentioned the surface water sampling results in the vicinity of Sangarédi shows high turbidity levels in surface waters despite the presence of sedimentation basins on site. The November 2023 results for surface water quality testing in the Sangarédi area showed compliant sediment concentration, however the sampling was performed during the dry season. The sediment testing shows some high levels of Chromium and Copper in a few locations, however not in areas where CBG operates.

The industrial effluent monitoring shows high levels of chromium at 3 sampling locations out of 5 in Sangarédi. One sampling location shows high levels of iron, and another location shows high levels of zinc and suspended materials. The IESC recommends CBG to investigate on the exceedances in heavy metal concentrations at the industrial facility in Sangarédi, and if relevant improve its pollution prevention measures.

Future mining areas

In the site assessment conducted in November, the IESC inspected the Kagnaka plateau which plans to be mined in Q1 2024. On the plateau, CBG presented an infrastructure devoted to surface water management, finished in September 2023. This infrastructure is comprised of a series of five sedimentation basins, in which water flows successively through a geotextile. Upon flowing into the various basins, the surface water is then directed into a river located approximately 20 meters away. According to a CBG representative, the design of the basins was carried out internally. This initiative marks the first time CBG has installed such a multi sedimentation basins, and an improvement from the existing single sedimentation basin present on operating plateaus. It is recommended that CBG leverages on the results from the Kagnaka basins to improve the sediments control on the whole site through the application of best practices and ultimately reduce the suspended solids in the surface waters around the site.

Currently, the EMoP doesn't list the new basins' outlet for the water quality monitoring. As CBG mining activities grow on other plateaus, the EMoP should be amended to include new measurement locations.



Figure 8-4 Sedimentation basins on the Kagnaka plateau (zone which will be mined in the future)

8.3.6 Groundwater: Recalibration of the Hydro/Groundwater Balance Model

Performance Standard 3: Groundwater: Recalibration of the Hydro/Groundwater Balance Model	
Associated open finding(s)	New: Nov 2023_EN_001 Legacy: NA

Mining activities have the potential to impact the proportion of infiltration versus surface runoff in the different watersheds. An increase in runoff and decrease in infiltration would negatively impact the water table and groundwater recharge. A water balance model simulating rainfall-runoff phenomena in Sangarédi Extension Area was developed and integrated into the WMP (dated 2018). The model described the hydrological processes in the different sub-watersheds, to estimate the short and long-term impacts of mining activities on infiltration versus surface runoff to eventually assess impact on groundwater table levels and water availability in rivers and head water springs to biodiversity and communities. The results from the flow into surface runoff indicated that the net effect of reductions in surface elevation and the hydraulic conductivity in the areas affected by the mining showed an increase in runoff, especially in peak flow.

The WMP mentions that groundwater data was required for the model to have two-dimensional groundwater flow, and for the model to be validated to ensure that a similar hydrological response is observed. This action was included in the WMP under "Recalibrate the Water Balance Model for Sangarédi based on the results of the pumping tests" (further subdivided into 5 actions). Following this step, the recharge of the water table and contribution the river base flow will be determined, and mitigation measures to ensure water availability to the communities and biodiversity will be implemented.

Since 2018, CBG has only performed the first sub-action which consist of the pumping tests (performed by Englobe in 2019) and was contracting SRK for the update of the model (second sub-action) at the time of the November 2023 site visit (ongoing since June 2023). The lack of progress would suggest the availability of a functioning/calibrated model has not been a priority for successive EMTLs, although ongoing appointment of a consultant indicates the intention to recalibrate the model remains.

This situation is leading to a delay in discussions concerning the execution of mitigation strategies to guarantee water availability for local communities and biodiversity and should therefore be prioritised by the recently appointed EMTL.

8.3.7 Domestic wastewater quality

Performance Standard 3: Domestic wastewater quality	
Associated open finding(s)	New : Nov 2023_EN_009, Nov 2023_EN_006 Legacy : NA

The wastewater from the Kamsar wastewater treatment plant is reused for the dust management on the CBG site. Following the November 2023 site visit, CBG provided the wastewater quality results. These show that all parameters are compliant with the applicable standards.

UV treatment system at the Sangarédi WWTP.

Previous monitoring reports informed that the treatment system in Kamsar showed insufficient capacity to treat the volumes of water received. Since the last site visit in June 2023, a replacement

UV unit has been installed at the Sangarédi WWTP. According to CBG personnel, since the installation, the total coliforms dropped from 1,500 to 0 CFU/100 mL. However, this was later not confirmed by laboratory results, which measured 600 CFU/100 mL on 23rd November 2023 (allowed thresholds of 400 CFU/100mL).

Bypass of the Kamsar WWTP

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

At the time of the June 2023 site visit, mapping of the sewage network in Kamar City has been completed and damaged components allowing ingress of rainwater had been identified and corrective actions taken. In the meantime, a project to purchase a flow meter (to be installed at the discharge) is in progress although not commissioned. CBG is also constructing a third treatment module (1,200m³ capacity) at the existing sewage treatment plant, significantly increasing capacity and minimising the need for rain fed effluents to bypass the WWTP. According to CBG, the installation of the third treatment module will be completed by IESC’s first site visit in 2024 (likely to be May 2024).

Once construction of the third treatment module is complete, volumes of water will need to be monitored to confirm there is no discharge of untreated sewage water during normal operating conditions. The IESC will revisit the issue and confirm the effectiveness of the third basin in subsequent monitoring visits.

8.3.8 Sludge management

Performance Standard 3: Sludge management	
Associated open finding(s)	New: Nov 2023_EN_011 Legacy: NA

The sludge from the wastewater treatment plants (in Sangarédi and Kamsar) are dried then used at the site’s rehabilitation areas. In June 2023, the IESC recommended to develop a procedure for the disposal of the sludge. In November 2023, the CBG teams informed the procedure has been developed, and shared that procedure with the IESC. Although CBG’s prompt action to produce the procedure is appreciated, the IESC notes that the procedure doesn’t mention the level of contaminants to be met by the dried sludge to be reused in rehabilitation areas. These criteria must be based on applicable standards (whichever standard is more stringent), or on best available practices if applicable standards do not provide criteria.

8.4 Waste Management

During the November 2023 site visit, a brief inspection of waste management facilities in Kamsar was made. This was supplemented with online meetings on the update of the Waste Management Plan implementation.

CBG operates waste facilities in Sangarédi and Kamsar. For the latter, two areas are used for waste storage: the Tora Bora site for domestic waste (primarily non-hazardous) and Kamsar hazardous waste site. In Sangarédi, the waste facility includes both hazardous and non-hazardous waste.

8.4.1 Waste Management Plan - general update

Performance Standard 3: Status of other IESC findings made in the December 2022 monitoring report	
Associated open finding(s)	New: NA Legacy: Oct 2021_025

Significant progress has been made in terms of execution of actions described in the Waste Management Action Plan since Q4 2022 as it can be seen on the graph below.

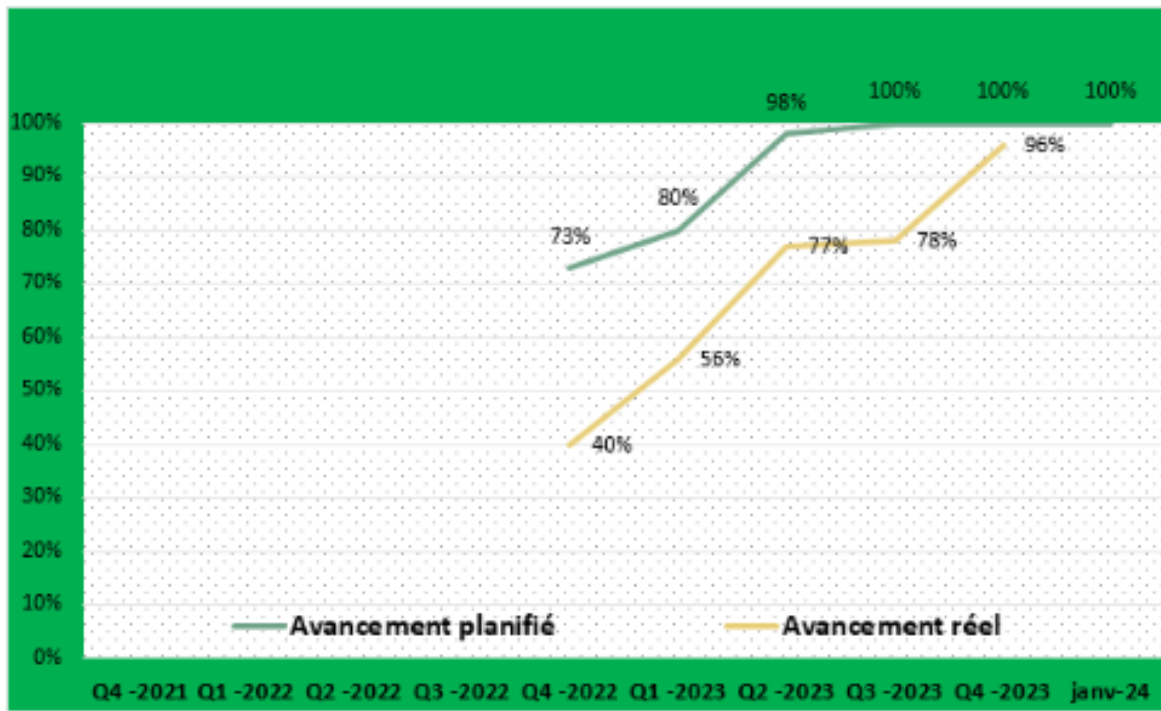


Figure 8-5: Status of Waste Management Action Plan implementation (as of end November 2023)

As part of the application of the Waste Management Plan, CBG currently focuses on the following actions:

- Public awareness campaigns and employees training (with 5 training sessions for 2023);
- Identifying companies for waste recovery (recycling, upcycling etc.);
- Waste facilities compliance;
- Waste identification and characterisation;
- Benchmarking for waste collection;
- Investigate the scenarios for the removal of the Tora Bora historical waste dump.

Previous IESC reports have highlighted the need to revise the Waste Management Plan to reflect current thinking and strategy around waste management and the longer term (plus 5 year) strategy. In November 2023, CBG informed that the update of the Waste Management Plan is almost completed.

The Waste Management Committee (WMC) with a new structure since October 2022 comprises of members from HSECQ team, other CBG functions and includes the Operations Director. Part of the

WMC's mandate is to produce a waste management policy that will be underpinned by a long-term waste strategy (noting the current waste management plan is limited to the short/mid-term). The long-term waste strategy is still awaited, however CBG informed the IESC it will be ready in Q1 2024.

8.4.2 Kamsar (hazardous waste facility)

CBG also operates a hazardous waste facility. This facility was originally used as a temporary site for wastes from the Expansion Project but has remained in use for hazardous wastes for several years. The IESC has previously reported a number of findings for this site relating to its poor suitability because it is a non-engineered site. Since, CBG has started construction of a dedicated hazardous waste facility on the same site, taking into consideration the comments from the IESC. During the June 2023 site visit, construction works at the facility were ongoing. Completion of the works were expected in November 2023, however during the November site visit the hazardous waste facility was being finalized and wasn't operational yet. Nevertheless, progress was noted by the IESC.



Figure 8-6 The hazardous waste facility in Kamsar (under construction)

8.5 Air Quality

A general status update against the air quality actions plans/key actions therein is provided below.

8.5.1 Status of AQMP and the AQ Memorandum update

The Air Quality Management Plan (AQMP) prepared in January 2019 did not specify stack emission criteria for the dryer stacks in Kamsar. An agreement was made between CBG and Policy Lenders to revise the AQMP based on stack emission limits that were to be derived and then agreed with

the Policy Lenders (captured in the ESAP, Item#13). However, additional modelling has since demonstrated that reducing emissions from the dryer stacks in isolation would not result in the desired ambient air quality (AAQ) improvements. CBG has therefore adopted a more holistic approach to improving AAQ, in which the improved emissions from the dryers are just one component of the approach. The new “holistic” approach, including detailed actions aimed at improving overall air quality in the Kamsar area, has the support of the IESC and Policy Lenders.

The AQMP will be updated in line with the agreed holistic approach.

The improvements performed since June 2023 include, *inter alia*:

- Engagement with KLN Industries (an engineering company) to address the findings of the Saacke external audit on the dryers;
- Audit of the electricity generators at Kamsar, performed by an external consultancy in July 2023, to produce an action plan to reduce the production of NO_x and SO_x;
- Completion of the dry and wet seasons stack emission monitoring campaigns;
- Alcoa continuous support in the review of the stack design and rehabilitation to reduce fugitive emissions (primarily dust) at the site;
- Repair of the PM_{2.5} and PM_{total} sensors at the Kamsar permanent station (Air Quality Monitoring Station – AQMS) in November 2023.

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

Performance Standard 3: Stack Emissions, Dust Suppression/minimisation and update of the AQMP	
Associated open finding(s)	New: NA Legacy: March 2022_015

This section aims at providing an update of the actions that are due or should be in progress as per the AQ Action Plan associated with the new holistic approach.

Fugitive emissions: Facility Wide Housekeeping and maintenance

The maintenance actions aiming to decrease the fugitive emissions (mainly due to the dust emissions at the Kamsar site) CBG undertook in April 2023 resulted in satisfying results according to CBG (e.g., less “mud” at the end of the wet season compared to previous year, suggesting less fugitive dust emitted during the season). These actions are now included in their routine inspections and maintenance schedules. CBG is currently on track regarding this aspect.

CBG experiences low pressure issues, sediments load, restricted availability and salinity in the water used in the Kamsar dust management systems. CBG has visited another bauxite operator/plant to share knowledge about their dust management systems. The other plant has a dedicated source of fresh water for the dust suppression system, which allows for a good pressure and water quality for dust suppression.

CBG is studying several options to remove the sediments from the water used in the dust suppression systems at the plant (e.g by getting water from desalination of brine taken from the sump in the crusher pit).

Other actions pertaining to the fugitive emissions reductions include (non-exhaustive list):

- Repair of non-functioning automation instruments and reinforcement of the automation system with new instruments in 2025. CBG plans to use artificial intelligence to help manage the dryers in 2025.
- Alcoa support in the review of the stack design and rehabilitation.

Dryer 1,2,3 rehabilitation Project

KLN Industries have been engaged to address the findings of the Saacke dryer audit (breakdown the action plan task by task). KLN Industries has started to work on the different actions and will implement improvement on Dryer 3 during its shutdown in December 2023. It is planned KLN will work on Dryers 1 and 2 during their joint shutdown (conveyor 8 will also be shut down) in February 2024.

Commissioning of Ambient Air Quality monitoring station (Kamsar)

See section 8.5.3.

Data collection for Dryer 4 CEMS

The Continuous Emission Monitoring System (CEMS) installed on dryer 4 encounters technical issues and is not working continuously (CBG and Alcoa explained during the AQ site visit in July 2023 that CEMS are very difficult to maintain in proper working order because of the high moisture content in the stack gas, mainly due to the water content of gases exiting the wet scrubber). CBG will maintain the equipment to the best of their ability but do not plan to equip dryers 1/2/3 with CEMS to date.

Dryer 1 Burner commissioning and improvement evaluation

The new burner combustion chamber installed on the dryer 1 has been commissioned and the performance tests show a decrease of fuel consumption of 17%. CBG plans to apply the same upgrades to dryers 2 and 3 in 2025.

The recirculation of heat at the dryers is another initiative which should result in less steam generated, less fuel used at the power plant thus leading to less emissions produced. Although not in the action plan, this initiative is good practice.

CAT audit - Power plant audit (generators)

Regarding the emission of NO_x and SO_x, the main sources are the power stations stacks. CBG has contacted Caterpillar to send a team to audit the generators at Kamsar (audit performed by MAK in July 2023) to produce an action plan to reduce the production of NO_x and SO_x. The first audit report has been received from MAK. CBG has experienced problems with MAK's English language capabilities. Audit Report is undergoing CBG review and will be shared with the IESC following the review.

CBG operates 3 generators in Sangarédi and 5 in Kamsar (G12, G13, G14, G15, G16). Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators located in the original Kamsar central powerhouse by 2020. The IESC understands the old generators are no longer being used, however, they have not been decommissioned.

The IESC has requested a full inventory of the generators (also with their characteristics i.e. number of running hours, age and date of purchase), provided by CBG but which does not allow to know their location (Kamsar or Sangarédi) and states old generators are "declassified" (not decommissioned), however CBG confirmed the old generators were no longer in use, not maintained, and their related operational tower has been dismantled.

Stack emission testing

A stack emission campaign during the dry season was completed in May 2023. The wet season campaign has been performed at the time of the site visit. CBG informed the IESC will receive a

single stack emissions report for 2023, covering both dry and wet seasons although no date was indicated. The stack emissions tests were not performed on dryer 1 as it wasn't 100% operational this year (it was in commissioning) nor on the boilers, as per IESC's understanding. Dryer 1 will be undergoing tests in the next stack emissions sampling campaign.

Model calibration

Following the dry and wet seasons stack testing campaigns, CBG will update the air dispersion model at the end of 2023 or early 2024.

8.5.3 Air Quality Monitoring

Performance Standard 3: Air Quality Monitoring	
Associated open finding(s)	New: Nov 2023_EN_007, Legacy: NA

The IESC previously reported malfunctioning equipment was preventing collection of ambient air quality data from the Kamsar air quality monitoring station. In December 2022, the IESC reported the repair of particulates sensors, and the non-functioning of SO₂ and NO₂ equipment. CBG purchased new SO₂ and NO₂ sensors in 2023 but the sensors now need calibration and full connection to the station. In addition, in August 2023, the sensors for PM₁₀, PM_{2.5} and PM_{total} (TSP) stopped working. The PM_{2.5} and PM_{total} sensors were repaired in November 2023, while the PM₁₀ sensor still needs to be connected. As such, there are no records of NO_x and SO_x for the entirety of 2023 and no records of PM from August to November/December 2023. CBG is expecting the Kamsar ambient air monitoring station to be fully operational in early 2024. As mentioned in the PS1 section, the generally slow nature of CBG's procurement process is likely to be contributing to the slow progress for this specific issue.

Monitoring also continues at various Project sites (communities and along the railway) using portable monitoring equipment to measure concentrations of airborne particulates, and passive samplers to measure NO₂ and SO₂. Partial results were provided by CBG for 2023, presented in the table below. Sampling durations are variable for NO₂ and SO₂ (between 1 and 9 days in Sangarédi and between 1 and 34 days in Kamsar) without any explanation. It is not clear if the missing results are not available (campaigns not performed) or have not been provided. As a reminder, the frequency of NO₂, SO₂, PM and metals monitoring in ambient air (in addition to the continuous monitoring near Kamsar) is quarterly, according to CBG's monitoring plan.

Compound	Period	Sampling duration	Concentrations in ambient air (min – max, µg/m ³)		Ambient Air quality Standards (AAQS, µg/m ³)
			Sangarédi	Kamsar	
NO ₂	May-July 2023 (3 rd campaign)	1 to 34 days	2.20 – 16.5 except 2 values: 41.4 and 43.4	1.24 – 6.57 except 1 value: 136.8	40 (annual average)
SO ₂			0.19 – 4.25	0.06 – 2.02	50 (annual average) 125 (24hr)
TSP	Sangarédi: May-June 2023 (2 nd campaign) Kamsar: March-July 2023 (1 st and 2 nd campaigns)	24 hours	24.7 – 106.7	20.9 – 169.1	-
PM ₁₀			8.6 – 61.8	18.0 – 103.7	150 (24hr)
PM _{2.5}			11.5 – 28.2	11.7 – 83.2	75 (24hr)

In bold: value exceeding AAQS

Table 8-1: airborne particulates monitoring results (provided following the November 2023 site visit)

Results available for SO₂ and PM₁₀ are all below the ambient air quality standards (AAQS) defined in the AQMP. Results for NO₂ are also below the annual AAQS of 40 µg/m³ except for Kastrie sampling point near Sangarédi in May 2023 (136.8 µg/m³ measured on 1 day), and Mbourore and Paragogo near Kamsar in June 2023 (respectively 41.4 µg/m³ measured on 1 day and 43.4 µg/m³ measured on 6 days). Given the associated sampling durations, these exceedances cannot be directly compared to the AAQS expressed in annual average. One exceedance of PM_{2.5} AAQS was observed at Diassia PK 27 sampling point in May 2023.

Some laboratory results have also been provided by CBG for metals, nitrite and sulphate, measured in August 2023. Only raw data are available (µg/sampling device), that does not allow to convert results into interpretable values (in µg/m³).

8.6 Noise and Vibration

8.6.1 General

Performance Standard 3: General (noise and vibration)	
Associated open finding(s)	NA

Noise and vibration monitoring programmes are being executed to plan without major difficulties since the June 2023 site visit. CBG has completed all the actions pertaining to the Noise and Vibration Management Plan (NVMP).

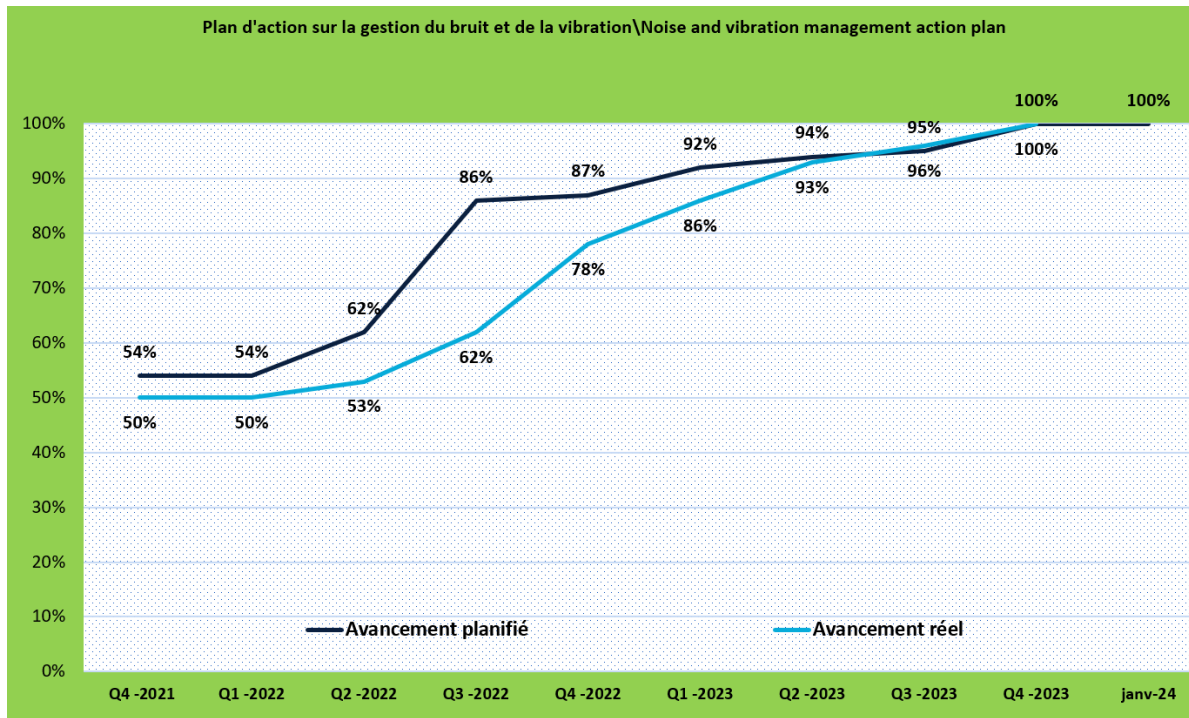


Figure 8-7: Implementation of the Noise and Vibration Action Plan

8.6.2 Noise monitoring along the railway

Performance Standard 3: Noise monitoring along the railway	
Associated open finding(s)	New : NA Legacy : June 2023_022, March 2021_027

One of the key recommendations made by the IESC relates to the mapping of sensitive receptors affected by the MUOA rail project, specifically those receptors identified within 50m of the railway that, based on predictive modelling, will potentially be impacted by noise and vibration from increased train movements in the future (phase 2). This activity was previously reported to be delayed in October 2021 and was highlighted as a key action for 2022. The December 2022 IESC report states that preliminary mapping, using satellite imagery has commenced and will be verified by in-field mapping of sensitive receptors. From June to November 2023, the mapping was still ongoing. The monitoring programme for sensitive receptors along the railway is ongoing and additional new sites have been identified and are currently being monitored. There are currently 11 sites monitored for baseline collection (instead of 3 originally).

Since June 2023, CBG has started a reforestation pilot project to investigate the most efficient type of trees to reduce the noise. The results of the pilot will be used for reforestation works in the villages mostly affected by the multiuser railway to reduce noise emissions.

The results of noise monitoring campaign (taken in May, June, October and November 2023) at residential locations along the railway, in Sangarédi and Kamsar show many non-compliant noise values (both during the day and night). In the view of these results, the IESC recommends CBG to investigate the contribution from CBG operations to these noise measurements (recognising there are other sources of noise), develop a plan listing all sensitive receptors most impacted by CBG operations, investigate the efficiency of the mitigation measures implemented to date, and add mitigation measures if required.

8.6.3 Blasting noise and airblast overpressure monitoring.

Noise and airblast overpressure due to blasting activities are monitored by CBG and assessed against applicable project standards (AZNEC limits). In 2023, 100% of the airblast overpressure measurements and 98,86 % of the noise measurements were compliant with the AZNEC limits. CBG informed the IESC that no complaints related to the blasting were made in 2023.

These results are visible following the implementation of new stemming¹² techniques, and the increased buffer zone afforded to villages whilst the CAO mediation process continues and pending a report from the independent blasting expert. For the record, only surface miners are allowed to operate in the 500m to 1,000m distance from the sensitive receptors.

8.7 Soils

Performance Standard 3: Soils	
Associated open finding(s)	June 2023_021

The ashes resulting from the incineration of the domestic waste in Kamsar are considered non-hazardous by CBG team and are currently reused in remediation activities. However, the waste management plan mentions the ashes are considered hazardous waste. Moreover, the waste from which the ashes are produced are not currently listed in the existing domestic waste management procedure. This will need to be captured in the domestic waste management procedure to confirm that incineration ash is suitable for reuse. Furthermore periodic analysis of ash is required to confirm its suitability for reuse.

¹² Stemming refers to the packing of material in the charge hole. Poor stemming results in blow outs/loss of energy. And increased noise/dust levels.

8.8 Dredging

Performance Standard 3: Dredging	
Associated open finding(s)	Oct 2021_012

The maintenance of the 'Petit Port' involves annual dredging activity, and additional dredging every three years. A dredging campaign was performed at the Petit Port from the 11th to the 28th July 2023. During this period, 368 002 m³ were removed from the Petit Port and placed at zone A3, located around 10 km from the shore (see figure below).

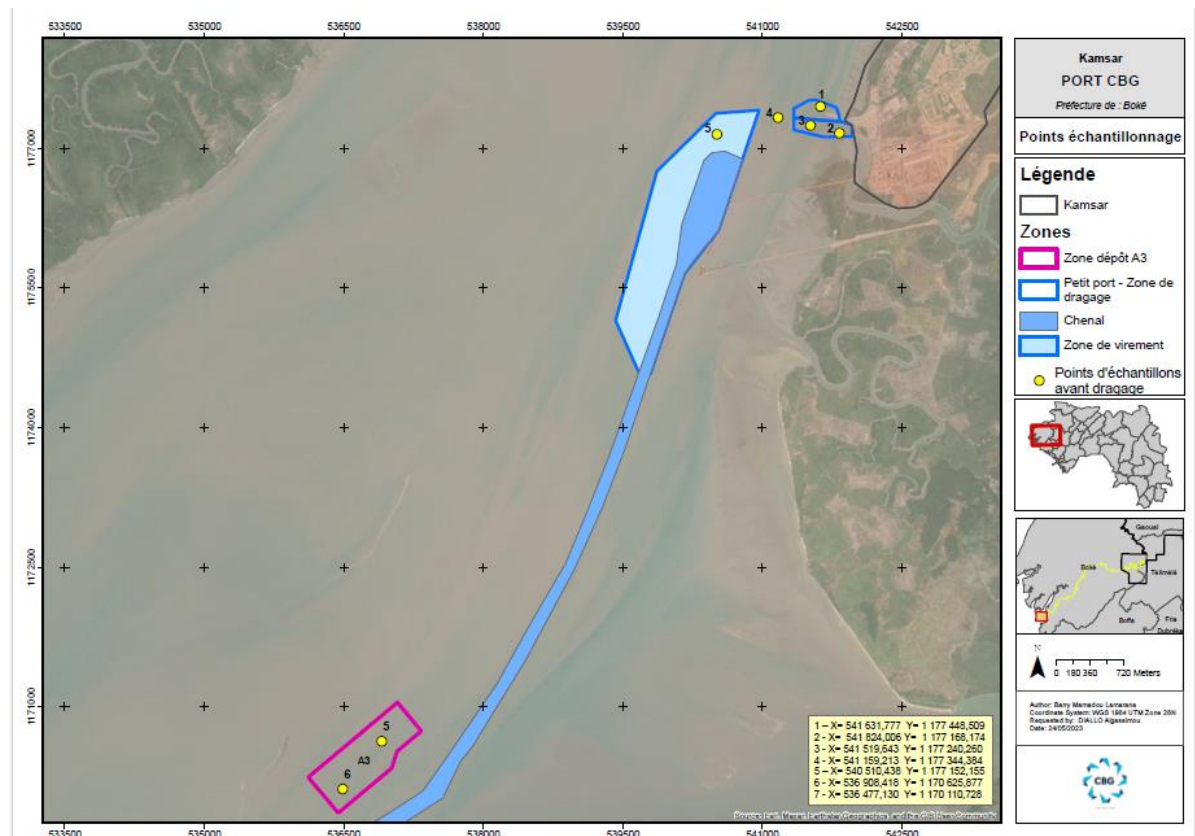


Figure 8-8 Kamsar port (empty blue lines show the Petit Port dredging area and the disposal area A3 is in the pink zone)

Currently, two monitoring points for water quality and sediments are located at the Petit Port, and turbidity is measured throughout the dredging campaign, with measurements performed 100 m from the work location during dredging. The Dredging Management Plan requires turbidity to remain below 25 mg/L exceedance from the baseline value, but CBG exceeds this requirement at each dredging campaign and questions the relevance of this requirement in the Guinean context, as well as the distance of the monitoring from the dredging location. CBG plans to update the dredging management plan as part of the environmental plans' update and will investigate the applicable requirements then¹³.

¹³ The Dredging Management Plan will be reviewed by the IFC and Lenders in accordance with the Management of Change procedure.

8.9 PS3 Open findings

8.9.1 PS3 High significance findings

Table 8-2: Summary of open high significance Findings, PS3

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_EN_004	Drinking water quality at Cogon and Batafong drinking water treatment stations	Water monitoring results shared by CBG during the November 2023 site visit show high aluminium concentrations in the water treated by the Cogon and Batafong drinking water stations. In August 2023, an audit was performed by an external consultant and resulted in an action plan aiming to bring the Cogon plant to compliance. The implementation of the action plan is currently ongoing.	Fully implement the recommendations from the external audit report relating to the Cogon treatment plant and monitor for any improvement. If corrective actions result in an improvement, apply these to the Batafong treatment plant where feasible.	High	Open
Nov 2023_EN_001	Recalibration of the Hydro/Groundwater Balance Model	The Water Management Plan includes the action "Recalibrate the Water Balance Model for Sangarédi based on the results of the pumping tests" (further subdivided into 5 actions). Since 2018, CBG has only performed the first sub-action which consist of the pumping tests (performed by Englobe in 2019) and was contracting SRK for the update of the model (second sub-action) at the time of the November 2023 site visit (ongoing since June 2023). The lack of progress would suggest the availability of a functioning/calibrated model has not been a priority for successive EMTLs, although ongoing appointment of a	The IESC recommends prompt contracting for the update of the model and avoid any delay in discussions concerning the execution of mitigation strategies to guarantee water availability for local communities and biodiversity.	High	Open (recategorized because this issue has been raised previously)

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
		consultant indicates the intention to recalibrate the model remains.			
Nov 2023_EN_014	Surface water discharge - Kamsar	<p>The drainage system for the surface water and stormwater at the Kamsar site showed high sediment and oil concentrations in the past.</p> <p>To resolve the issue CBG undertakes a few actions, among which the cleaning of the surface water drains on a regular basis. However, the IESC fears the cleaning activities would potentially resuspend settled sediments, thus not reducing the suspended sediments at the outlets.</p> <p>Despite CBG’s efforts to maintain the drainage system, some measurements of suspended materials and iron content at the surface water monitoring points are higher than the limits specified in the EMoP.</p>	<p>An engineering solution such as the installation of sediment traps at outlets must be found to effectively reduce the suspended sediments in the effluents.</p> <p>CBG should investigate cause of exceedances and put in corrective actions as a priority.</p>	High	Open
June 2023_016	Communities’ water resources	<p>During the June 2023 site visit, it was difficult for the CBG representatives to communicate on the exact number of boreholes funded by CBG. Moreover, as CBG is not responsible for their monitoring, the boreholes do not show on the monitoring map and their water quality results were not communicated.</p> <p>The results from SNAPE’s study on water needs in 50 villages in the mine weren’t shared with the IESC for review.</p>	<p>Although CBG is not responsible for maintenance of the boreholes, it is important CBG ensures strong liaison with SNAPE to be informed on the water quality at the boreholes within the affected communities (for instance as part of the “Comité de gestion des forages” or wells committee). This will enhance CBG knowledge of the boreholes (water quality, condition etc.) and will ensure a prompt response from CBG in case the boreholes do not operate as expected.</p>	High	Open

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ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
			CBG needs to develop a communication protocol with SNAPE regarding Communities' water resources monitoring.		
Dec 2022_032	Drinking water quality at Fassaly Foutabhé	<p>Community members have complained that water from wells fitted with iron removal devices is not potable. Visual inspection of one well supports the complaint.</p> <p>Community members also claimed that minutes of meetings had not been shared (a claim disputed by CBG).</p> <p>The stream at Fassaly Foutabhé continues to be highly turbid during the wet season/periods of rainfall (see issue Oct 2021_022).</p>	<p>CBG should prioritise close liaison with the community and SNAPE during further investigations and remedial works. CBG technical representatives should be present when SNAPE undertakes maintenance/repair or sampling from wells in Fassaly Foutabhé and ultimately ensures that the mine affected communities (including others impacted by CBG's operations) have access to clean water. CBG should also use its best endeavours to ensure results of the water quality monitoring are shared by SNAPE with community members.</p> <p>The means for dissemination and posting of minutes should be clearly communicated and all minutes/records of dissemination should be carefully filed so they can be made available to interested parties upon request.</p>	High	Open

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

8.9.2 PS3 Moderate significance findings

Table 8-3 Summary of open moderate significance Findings, PS3

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_EN_007	Air quality monitoring	Ensure prompt connection of installed equipment at the fixed station in Kamsar to allow collection of AAQ data.	For the fixed station in Kamsar: The IESC previously reported malfunctioning equipment was preventing collection of ambient air quality data from the Kamsar air quality monitoring station. There are no records of NO ₂ and SO ₂ for the entirety of 2023 and no records of PM _{2.5} and PM _{total} from August to November 2023. Furthermore, PM ₁₀ measurements were missing from August through to the conclusion of 2023. CBG expects the station will be fully functioning at the start of 2024.	Moderate	Open
Nov 2023_EN_008	Drinking water at Fassaly Belendéré	The women in Fassaly Belendéré elaborated on the water challenges, noting that the boreholes tend to run dry in April and May (at the peak of the dry season).	The IESC recommends CBG to investigate jointly with SNAPE on the water shortages at Fassaly Belendéré and provide water to the community in case of foreseen shortages, while investigation on the cause of the water shortages is ongoing	Moderate	Open.
June 2023_021	Waste management procedure	The domestic waste management procedure and the industrial waste management procedure (both dated April 2023) were shared by CBG and reviewed by the IESC following the June site visit. The IESC notices that the procedure is missing the waste management hierarchy chosen for each waste stream (reuse, recycling, elimination through for instance incineration), the location and method used for waste segregation, handling and elimination. Also, the procedure is	The domestic waste management procedure needs to include the waste management hierarchy chosen for each waste stream (reuse, recycling, elimination through for instance incineration), the location and method used for waste segregation, handling and elimination; and the link to existing procedures relating to domestic waste management. The waste incinerated will need to be identified in the domestic waste management	Moderate	Open

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ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
		missing links to other existing procedures relating to domestic waste (for instance on waste sorting, incineration process, ashes reuse etc)	procedure, as the ashes produced by the incineration are reused in remediation activities. Furthermore periodic analysis of ash is required to confirm its suitability for reuse		
Dec 2022_031	Surface drainage, Kamsar	Preliminary surface drainage designs have either been rejected or misplaced. The planned upgrade of the surface water drainage system is well behind schedule and at risk of not being completed by January 2024.	A timebound plan should be developed and the timeframes are fed into a revised Water Management Action Plan forecast, such that any slippage (if applicable) beyond January 2024 is known and communicated to lenders.	Moderate	Open
March 2022_015	Air Quality – fugitive dust emissions	An evaluation of dust suppressants has been ongoing for several months. Dust generating activities are an inherent issue for CBG's activities both at the mine and port locations.	CBG should expedite studies into the use of commercial dust suppressants and explore opportunities to use these and other techniques to further reduce fugitive dust emissions including: application of dust suppressants at Kamsar evaluated following completion of the ongoing dust suppressant study	Moderate	Open (efforts to reduce fugitive emissions ongoing. If use of chemical dust suppressants is no longer under consideration, the IESC should be informed such that this findings can be amended accordingly)
Nov 2023_EN_009	Sangarédi WWTP	Since the last site visit in June 2023, a replacement UV unit has been installed at the Sangarédi WWTP, however coliforms are still being detected.	Performance of the UV treatment plant should be investigated and optimised (as is the current CBG intention).	Moderate	Open
June 2023_022	Noise at sensitive locations	The results of noise monitoring campaign at some residential locations along the railway, in Sangarédi and Kamsar show non-compliant noise values.	In the view of these results, the IESC recommends CBG to investigate the part of CBG operations in these noise measurements, develop a plan listing all sensitive receptors most impacted by CBG operations, investigate the efficiency of the	Moderate	Open

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
			mitigation measures implemented to date, and add mitigation measures if required.		
Oct 2021_012	Dredging	<p>Stricter adherence with all the applicable requirements of the DMP is required in order to confirm impacts from dredging are known and minimised. Specifically:</p> <ul style="list-style-type: none"> - characterization of sediment from the dredging area and disposal area; - characterization of the benthic fauna from the dredging area and disposal area; and - underwater noise monitoring. <p>The DMP to be reviewed in line with the periodic management plan review cycle ahead of the next dredging campaign.</p>	<p>The 2021 dredging campaign did not strictly adhere to certain actions set out in the Dredge Management Plan. In particular, deficiencies were observed in terms of:</p> <ul style="list-style-type: none"> - characterization of sediment from the dredging area and disposal area; - characterization of the benthic fauna from the dredging area and disposal area; and - underwater noise monitoring. <p>The IESC understands new contracts with external laboratories and an ongoing marine survey will allow the deficiencies to be addressed in time for any further dredging campaigns.</p>	Moderate	Open (pending review of recent dredge campaign reports)
Oct 2021_022	Water quality - mine effluents	A spring used by Fassaly Foutabhé community members appears to have been adversely affected by CBG's mining activities.	CBG should investigate the causes of the contamination and, if found to be a result of CBG's activities, implement corrective measures to restore the quality of the spring water or ensure a replacement water supply for Fassaly Foutabhé in the event the spring water quality cannot be restored.	Moderate	Open CBG should continue to seek support from specialists and investigate potential sediment pathways to river from soil stored at Parawi to the north of the river (also see section 11.5.2)
Oct 2021_025	Waste management	Progress in the implementation of the waste Management Action Plan continues with a significant number of actions no longer	As reported previously, the Waste Management Plan should be updated to reflect CBG's current waste management strategy, including the potential use of Bendougou facility and longer-term strategy	Moderate	Open (understood the a revised version is near finalised)

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
		<p>relevant or behind the original schedule specified in the action plan.</p> <p>Community attitudes towards CBG's use of Bendougou have not been evaluated by the CBG CR team. The level of risk of community objections/blockades, similar to those that occurred in the past, is therefore unknown.</p>	<p>following end of the Tora Bora waste facility's design life.</p> <p>Also, the CR team to engage with the affected community members prior transportation of wastes to Bendougou.</p>		
March 2021_027	N&V impacts – rural areas adjacent to railway	<p>To date CBG has not specified feasible mitigation measures that could be implemented in the event noise standards are exceeded following the increase in ore transported by rail.</p> <p>A final solution could involve resettlement of affected parties. CBG should ensure alternative mitigation measures are identified to avoid resettlement.</p>	<p>The IESC recommends the following actions are completed:</p> <ul style="list-style-type: none"> • Confirmation of the location of sensitive rural receptors and distances from the railway line; • Establishment of a robust baseline N&V data set (before train numbers further increase); and <p>Identification of site-specific feasible mitigation measures in the event they should be needed i.e. availability of space and attitude of potentially affected parties to barriers/other measures). This is likely to be limited to installation of noise barriers and as such will need the involvement of the CR team in community consultations.</p>	Moderate	Open (although data collection for the baseline and investigation for trees planting to act as acoustic barriers are ongoing)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

8.9.3 PS3 Minor significance findings

Table 8-4 Summary of open minor significance Findings, PS3

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_EN_010	Industrial effluent compliance - Sangarédi	The industrial effluent monitoring shows high levels of chromium at 3 sampling locations out of 5 in Sangarédi. One sampling location shows high levels of iron, and another location shows high levels of zinc and suspended materials.	The IESC recommends CBG to investigate on the exceedances in heavy metal concentrations at locations in Sangarédi exceeding the thresholds, and if relevant improve its pollution prevention measures.	Minor	Open
Nov 2023_EN_011	Sludge management	CBG developed the sludge management procedure, however, the IESC notes that the procedure doesn't include criteria to be met by the dried sludge in order for it to be reused in rehabilitation areas.	The IESC recommends CBG to inform, based best available practices or applicable standards (whichever standard is more stringent), the criteria to be met by the dried sludge to be reused in rehabilitation areas.	Minor	Open
June 2023_015	Water usage and wastewater production at Kamsar plant	The water flow processed by the OWS was not known as upstream uses as these were not measured in a systematic way.	It is recommended to install water meters at the main contributors to wastewater production (locomotives cleaning station, and power station). This will help CBG to further understand water consumption on site, and	Minor	Open

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
			draft water saving strategies.		
June 2023_020	Waste management hierarchy	<p>During the site visit, the CBG team has shown the plastic-based bricks produced from plastic wastes.</p> <p>Although the IESC encourages CBG to further investigate recycling and reuse opportunities, it must be reminded here that waste production prevention comes first in the waste management hierarchy.</p>	<p>For plastic waste, it is therefore suggested that CBG substitutes single use plastics (i.e. plastic bottles) by solutions generating lower waste volumes (i.e. water fountains).</p>	Minor	Open
Nov 2023_EN_006	Water Quality - Kamsar WWTP	<p>The WMP Action Plan includes specific actions relating to use of an untreated effluent bypass at the Kamsar WWTP outside of emergency situations. Investigations have confirmed direct discharge of untreated sewage water to the estuary only occurs during high rainfall events because of rainwater ingress to the sewage drainage network.</p> <p>CBG is constructing a third treatment module at the existing sewage treatment plant, minimising the need for rain fed effluents to bypass the WWTP</p>	<p>A flowmeter should be installed to monitor the frequency of discharge events and volume of untreated water discharged to the estuary. Monitoring should confirm no discharge of untreated sewage water during normal operating conditions.</p>	Minor	Open
Oct 2021_026	Hazardous materials management	<p>Radioactive lightning rods are present on CBG facilities. These are prone to decay and damage over time and therefore need to be carefully managed. Currently CBG’s plan for ultimate dismantling and disposal of these radioactive sources is undefined.</p>	<p>A longer-term solution for the safe dismantling and disposal of radioactive lightning rods is required as per action 4.18 of the HAZMAT Action Plan. The Waste Management Plan will also require update to include the disposal route(s) for this waste.</p>	Minor	Open (to be investigated during the next site visit)

CBG BAUXITE MINE

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Oct 2021_027	Energy efficiency/GHG emissions	CBG is refining its SOP for GHG emission monitoring and reporting.	IESC recommends that GHG emissions reporting data is broken down such that fuel use/GHG emission can be normalised (tonnes CO ₂ /unit of bauxite produced) and attributed to the different users of the railway (under the MUOA)/consumption of electricity by communities in Kamsar and Sangarédi. The methodology for apportioning GHG emission to different users can be detailed in the revised SOP. Visiting vessels (e.g. dredgers) with their own fuel source should also be captured in the GHG emissions calculations.	Minor	Open (procedure schedule for June 2022 – open pending review of 2022 AMR)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

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

9.1 Communicable Disease Prevention

According to the material shared for review, progress has been made in relation to the malaria and HIV/AIDS programmes which are reported in the following sections.

9.1.1 Malaria

Performance Standard 4: Communicable Disease Prevention - Malaria	
Associated open finding(s)	New: NA Legacy: Dec 2022_035

As mentioned in the June 2023 monitoring report, two framework agreements have been established between CBG and the ONGs CEFACAM (Centre d'Encadrement et de Formation Ami Camara) and FMG (Fraternité médicale de Guinée) to carry on the malaria programme. Specifically:

- FMG agreement on conducting a study to assess the knowledge, skills and practices of communities in fighting malaria in Sangaredi, Kamsar and Daramagnaki communities, which has 1-year duration. The study has been carried out in the communities as planned and the report is under finalization by the NGO. Whilst the report's delivery date is not clear, as well as the time of the disclosure activity, the IESC expects to discuss final results of the activities during the next monitoring visit.
- CEFACAM agreement on awareness-raising and distribution of treated-mosquito nets in Kamsar, Sangarédi and Daramagnaki communities and to public health facilities. The programme is underway; 168 awareness sessions were undertaken and 13,277 people were sensitized in households and health structures in the localities covered. The distribution of mosquito nets was scheduled for December in households and health structures located in the communities.

The IESC understands that activities have started in May 2023, though an overall planning of the activities has not been provided to understand interrelations.



Figure 9-1: Malaria Program’s photos

9.1.2 HIV and AIDS

Performance Standard 4: Communicable Disease Prevention - HIV and AIDS	
Associated open finding(s)	New: NA Legacy: Dec 2022_036

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

The IESC noted that the programme has been launched in August 2023 in Kamsar and its implementation is underway. Awareness raising has been completed successfully at the target level; villages, markets (200%, which means twice the number of people planned participated), bus station (100%), mosque, fishing ports (100%). Workshops (86%) and identified project women’s groups (80%) participated in the awareness raising activities. 100% of identified health personnel have been trained on the communication techniques and approach (32 health workers) for Social and Behavioural Change and 125% (one fourth more people participated), of identified Peer Educators were trained (32 Peer Educators).

A total of 12,599 people has been sensitized and 3,703 people screened. In schools the implementation was scheduled for December 2023.



Figure 9-2: - Launch of the HIV program’s photos

9.2 Community drinking water

According to the material shared for review and based on discussions held on site, CBG has undertaken the following activities in relation to the provision of drinking water:

- 5 boreholes drilled in Kamsar in 2023 as part of the 33 boreholes in Kamsar project. 34 boreholes drilled in total. 1 more borehole requested by the commune.
- 8 boreholes drilled in 8 villages and 10 boreholes to be rehabilitated in 9 villages in 2023, as part of the programme to drill 53 boreholes and rehabilitate 64 boreholes in 54 villages in the off-mediation mine over 3 years (2023-2025).
- Another 5 boreholes to be built in 2023 as part of the annual community investment programme.

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

9.3 Rail and Community Health and Safety

Performance Standard 4: Rail and Community Health and Safety	
Associated open finding(s)	New: Nov 2023_SO_006 Legacy: June 2023_025, June 2023_026, Dec 2022_037, Dec 2022_038, March 2022_025

30 community awareness campaigns on railway safety operations and the related risks and impacts were conducted on the issue of railway safety in 2023, with 17 meetings organized since the June 2023 monitoring report. Meetings have been held in numerous communities¹⁴. In addition, two awareness-raising meetings were also held for the disabled on railway safety and the community complaints management mechanism in Kamsar. Lastly, three meetings to manage the concern linked to the passage of the communities of Kafélé and Dakoumourou at PK65 were held in Tanéné.

In addition, CBG has undertaken the following meetings:

¹⁴ In the following locations: Kiaye, Tambony, Ramballai, Mansalia, Fodé Contéya and Babadia, Madinakébégna, Dacountou and Madina-Carrefour, in the schools of Dabaya and Correrah, in Filima, Port Néné, Madina-Borbof Dar-Es-Salam, Kayenguissa and Kassongony, and in Thiankoun raile and Boundoulengué

- Two (2) consultation meetings between multi-user stakeholders (CBG, GAC, COBAD, ANAIM) for the launch of the betafence project with the Kolaboui town council.
- One (1) meeting to continue construction work on the fence in the GAC mining zone at Tantouloumany.
- Three (3) meetings have been held with the NGOs CEFAD, SOTRAC and CBG as part of the launch of the community rail safety awareness program. On this specific matter, during the November 2023 monitoring visit, the IESC understood that the launch of the rail safety awareness program had been delayed due to some threats the NGO CEFAD received. The IESC understood through the discussion held on this matter that these threats had come from community members demanding to have a different NGO undertaking the campaign. At the time of the site visit, CBG was already dealing with this matter with the aim of having the railway safety campaign launched at the earliest opportunity. More updates will be collected during the next monitoring visit, particularly in relation to the steps taken to resolve the issue and the deployment of this campaign.

According to the material shared for review, CBG has also organized 9 field visits on the railway as part of railway safety:

- One (1) visit to the GAC mine area in connection with fencing installation work at Tantouloumany and Boundoulengué. –
- Seven (7) field visits to measure the distance to be fenced in along the railway line; as part of the management of requests from the communities of Horé Lafou, Lafou Mbaila, Parawol Malassi, Sakidjé; Niangaba, Poora Rail and Kalinco Ley. –
- 1 safety stop following observation of communities passing between wagons.

As concerns railway crossings, footbridges have been installed and KPs have been provided as part of the material shared for review.

Designation	Localisation	Point Kilométrique voie CFB
LOT 1	KAMSAR	2+310
		3+060
		3+700
		4+685

Designation	Localisation	Point Kilométrique voie CFB
LOT 2	KAMSAR	6+280
		6+720
		7+100
		8+130

Designation	Localisation	Point Kilométrique voie CFB
LOT 3	KOLABOUI	30+800
		31+600
	GAC MINE	88+680
		89+800

Figure 9-3: – localization of Footbridges

Installation of 21,000 linear meters of betafences has been planned in the following areas:

- Kamsar: from KP1.54 to KP 9.34
- Kolaboui: from KP 30.6 to KP 31.1
- Zone de GAC: from KP 88.5 to KP 89.6

As already reported, betafence installation started in May 2023 in Bilingual (at KP 89) through the appointment of 7 micro enterprises (Très Petites Entreprises (TPEs)). Installation has started at KP 88 – Bilingual (GAC Mine area) and CBG planned to have all betafences installed by the end of Q1 2024; however, works in Kamsar and Kolaboui are still on hold pending local authorities' approval. In addition, the Borrower E&S Certificate (Q3-2023) informs that betafence installation in Bilingual is temporarily on hold pending completion of the compensation for cashew trees. Furthermore, the Q3-2023 Borrower E&S Certificates also confirms construction of an Assembly Hall and a mosque with parking and other facilities in Kastray, as requested by the Authority in Kamsar, to provide parking for the sand trucks which were previously parked along the railway; and that procurement of 12 horns has been completed, with 6 installed and the remaining 6 under customs clearance process.

Meeting with the community of Filima in Kamsar, that was held by the IESC during the November 2023 monitoring visit, confirmed a strong opposition towards betafences and also informed the IESC that vulnerable people, such as PwDs and elderly, do not use the foot bridges and await the train to pass to cross the railway. The IESC understood that one of the reasons for the reported opposition is related to the need for the community to access the other part of the city for emergency to reach health centers which are mainly located on the other side of the railway.

During the November 2023 monitoring visit, a meeting with ANAIM confirmed commitment to collaboration between parties. A discussion was held to discuss options to further support betafence installation and has defined possible "normative" solution - i.e. by requesting the establishment of a ministerial decision whereby to apply more stringent safety measures in large urban areas crossed by railways - to support social acceptability. The IESC will verify progress on the discussed "normative" solution during the next monitoring visit; in the meantime, the IESC strongly recommend that community sensitization continues and that concerns around betafence installation be collected and appropriately address also through the installation of additional manned pedestrian gates (portillons) in strategic area in Kamsar to ensure safe crossings, that may further support social acceptability while allowing CBG to regulate and monitor railway crossing. On this matter the IESC has two additional observations made following site visit observations and discussions held onsite:

- Pedestrians regularly cross the railway, and crossings have been observed even when a train was approaching, despite the flagman's presence (Homme Piquet) in proximity of the area. The IESC recommends that additional awareness raising is provided to flagmen to ensure a stricter control over railway crossing, while training them on the appropriate ways to interact with communities and to ensure smooth community relations.
- Whilst the IESC encourages the installation of additional gates to further support social acceptability, it is understood that with the MUOA project, the number of trains will gradually increase from 30 trains per day in 2024 to 40 trains per day in 2028, and crossing via the gates will be more difficult due to the increased number of trains. The increased passage of trains, will certainly result in additional consequences in terms of e.g. regulation of traffic of vehicles and pedestrians, access to urban areas, and social acceptability altogether.

Although the grievance register does not record additional animal accidents in the last months of 2023 until October, based on the discussions held onsite, livestock accidents still occur along the railway and communities are reportedly becoming frustrated. As previously reported, some communities around the mine have requested installation of betafences along the railway to reduce the risks of livestock accidents. Minutes have been shared for review that show progress of the steps taken on this matter, with CBG and communities' (community chiefs) participation in measuring the distance to be fenced. These measurements have been taken place in Horè Lafou, Lafou MBaila, Parawol malaci, Pora rail. The IESC understands that in addition to these actions,

CBG plans to discuss other options / solutions (yet to be confirmed) in the next weeks along with the technical and legal departments.

CBG's procedure for the crossing of herds during transhumance dated May 2022 has been shared for review. The procedure informs of the steps required in these cases and involves herders, flagmen, switchmen and train drivers. The IESC has no comments on the procedure; however, due to the increasing frustration among communities perceived by the IESC, it would recommend to further disclose this procedure during the engagements with the most impacted communities in relation to betafence installation.

No major incidents involving community members have been reported in 2023.

9.4 Mining site and Community Health and Safety

Performance Standard 4: Mining site and Community Health and Safety	
Associated open finding(s)	New: Nov 2023 HS_004, Nov 2023_SO_010, Nov 2023_SO_007 Legacy: March 2022_008

New community roads at the mine have been built by CBG in line with community consultation, and security posts were observed by the IESC to have been installed at the intersections; however, the intersection of haul roads and some old community roads were observed unguarded with increased risk of incidents involving communities. CBG should therefore ensure to close access to the old community roads, particularly if not guarded.

During the November 2023 site visit, the IESC continue to observe regular presence of pedestrians and vehicles at the mine, despite the presence of dedicated community roads built by CBG last year. In accordance with the Road and Rail Safety Management Plan, CBG should implement appropriate signage along the road (new signs were observed onsite but signage still requires improvements altogether) and controls at the mine to reduce presence of unauthorized people in CBG's operational areas including haul roads.

During the November 2023 site visit, the IESC visited the sedimentation basin (basin N°4) at the Sangarédi mine site where a 13–15-year-old girl drowned on May 18th, 2022. Based on the discussions held onsite, the IESC understood that basin N° 4 was built by CBG around the same time as the installation of the railway, to allow for water drainage near the railway. The IESC understood that the 7-meter-deep basin used to be fenced but that some parts of the fence was removed by outsiders to CBG. With the basin becoming accessible, young people from nearby communities used the basin for recreational purposes (swimming). CBG reported to have sent letters to the local authorities to warn of the risks to have young people accessing the basin. According to CBG, no feedback was received from the authorities; the fatality occurred afterwards.

Since then, the basin was surrounded by concrete walls, which the IESC observed during the November 2023 monitoring visit. The basin is still operational, but access isn't allowed.

Through the 'Deferred Remedial Action Plan - May 2022 incident' report, CBG reported preparing an updated tracker for internal use which includes specific details on notification requirements, timeframes and internal reporting. The document also mentions CBG is in the process of establishing a master Remedial Action Plan follow-up file to ensure consistent tracking and follow up of relevant incidents, including this incident. In addition to this, CBG committed to commission an independent audit in respect of all fatalities that have occurred within the Borrower's concession from 1 July 2021 to present.

CBG has reported preparing an updated tracker for internal use which includes specific details on notification requirements, timeframes and internal reporting however this was not shared with the IESC.

9.5 Blasting Protocol Implementation

Based on the review of the Borrower's E&S Certificate (Q3-2023), blasting has been discussed in the 16th CAO mediation session that took place between in 19, 21 and 24 July, 2023. Among the blasting-related achievements, the Borrower's E&S Certificate indicates the signature among the parties of the amendment to the agreement on blasting which notably covers the agreement with the communities not to build inside the extended buffer zones pending the recommendations of the independent expert. During the November 2023 site visit, no additional updates on the blasting protocol implementation have been discussed or shared.

9.6 Community Development

9.6.1 Updated Community Development Plan

The Community Development Plan (CDP) has been validated by lenders and a 2023's Action Plan is being implemented.

9.6.2 Implementation of the 2023 action plan.

As part of the CDP, CBG has/will develop several types of social projects (including infrastructures projects).

In terms of basic social infrastructures ('infrastructures sociales de base') project progresses, it is important to note that some updated information was received in October 2023. The total number of projects reported in different phases are 30, and their specific progress status is detailed as following, divided into projects as part of the Community Development Plan (PDL or Plan de Development Local) and additional projects outside the Community Development Plan (non-PDL):

- 9 projects are fully completed, e.g., built and functional (30% of the projects reported). 7 of them are PDL projects, and 2 of them are non-PDL projects.
- 15 projects are constructed, however non-functional (50% of the projects reported). 13 projects out of 15 are PDL and 2 are non-PDL.
- 5 projects are under construction (16.7% of the projects reported). 4 out of 5 are PDL projects and 1 is non-PDL.
- 1 PDL project is in renovation phase (3.3%).

Based on the material shared for review, the IESC further understands that 25 out of 30, i.e., the 83% of the PDL projects reported have been located in the Boké, Téliélé and Gaoual communities. The selection of 13 projects in the same communities was already noted and detailed in the June 2023 monitoring visit, however their progress status is an additional information received in October 2023.



Figure 9-4: . 9 photos of the fully completed projects

Further than the donation of didactic materials for schools in Hamdallaye, Fassaly Foutabhè, Niangaba and Parawi, CBG implemented 3 news donations, detailed as following:

- Donation of materials for the reconstruction work on the Bagataye mosque.
- Donation of materials for the renovation of the Saint Jean Baptise church in Kamsar.
- Donation of materials to the Kayenguissa health center.

Implementation and monitoring of the donation process is confirmed to be an ongoing and continuous activity carried out by CGB.

In relation to Phase 2 of the Income Generating Activities Support Projects or 'Projets d'Appui aux Activités Génératrices de Revenus' (PA-AGR), CBG has started the consolidation phase with CECI, where 21 beneficiaries' groups (GIE) were selected, and one support plan has been developed for each of them. To date, 6 groups out of 21 were trained and equipped in financial management and 2 groups out of 21, which owed credit to the revolving fund, have repaid the amounts due.

In summary, an identification of the needs of the groups was undertaken, and an implementation of a support plan for each one has been implemented according to their area of activity. Accordingly, the action plan is in execution, which is a progress in relation to the last June 2023 monitoring report, where CGB had only signed a Phase 2 with CECI, and the action plan was still under finalization at that time. However, KPIs shared for review also indicates that foreseen trainings courses are yet to be rolled out along with the construction of infrastructures for existing GIE and the provision of training in functional literacy. Progress on these aspects will be also discussed in the next monitoring visit.

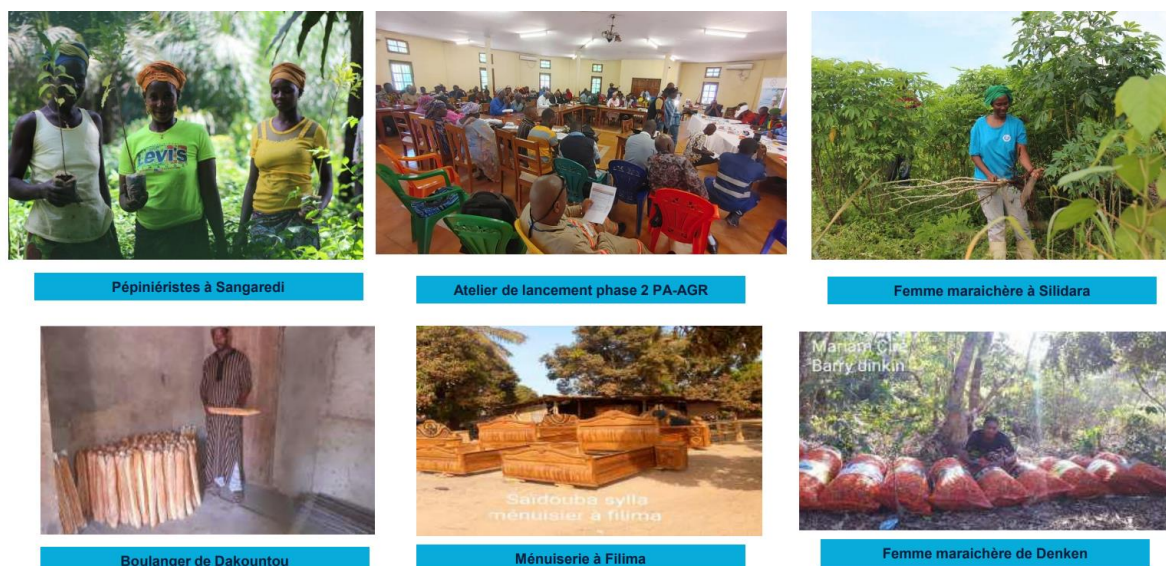


Figure 9-5: CBG's photos of PA-AGR

In regards of Local entrepreneurship, it is important to note that CBG started the capacity building programme for TPE (Très Petite Entreprises) with IFC Advisory and the creation of 1 Small Medium Enterprises (SMEs or Très Petite Entreprises (TPE)) in Kamsar is underway.

As mentioned in the June 2023 monitoring report, out of 14 TPEs, 11 are functional. However, the amount of TPEs that were fully repaid the amounts due to the revolving fund are 11 this time, instead of 9 (last report), which is a progress in relation to the last report. Currently there are not TPEs in the process of repayment.

In addition, CBG reported that a participatory diagnosis was carried out in the project areas to identify promising sector and individual and collective Income Generating Activities, which was already noted in the June 2023 monitoring report. At that time CBG was still waiting to a draft diagnostic report from Sylla Consulting, nevertheless, this report has been delivered and CBG's comments are now to be integrated.

CBG reported the start of the capacity building program for TPE with IFC Advisory, the completion of the study on community waste management in Kamsar, as part of the agreement with IFC Advisory and the start of the project to extend smokehouses in the localities of Port Nènè, Dapiare and Taidy (CR de Kamsar) financed by the CSL GROUP of Canada and implemented by the NGO Vision sans frontières.

The Community Development Action Plan reports an 97% progress in October 2023 versus the 99% completion planned. Most of the actions have been undertaken to date, inter alia:

- Participatory diagnosis for the implementation of the new IGA program;
- Perception study covering the entire CBG area of influence;
- Launch and monitor the study aimed at assessing community knowledge, skills and practices on malaria;
- Carry out market research to identify growth sectors; and
- Installation of infrastructure identification signs.

Remaining activities are all in progress, and related to malaria awareness raising programme and distribution of impregnated mosquito nets, the Capacity Building program for TPE, and the baseline

study, with the baseline study started with the CEMED firm, the inception report is available and the data collection planned in December 2023.

9.7 Influx Management

9.7.1 Influx Management Plan

During the November 2023 monitoring visit, CBG reported delays in the implementation of the action plan which shows 65% progress compared to planned 100% originally planned for by the end of 2022.

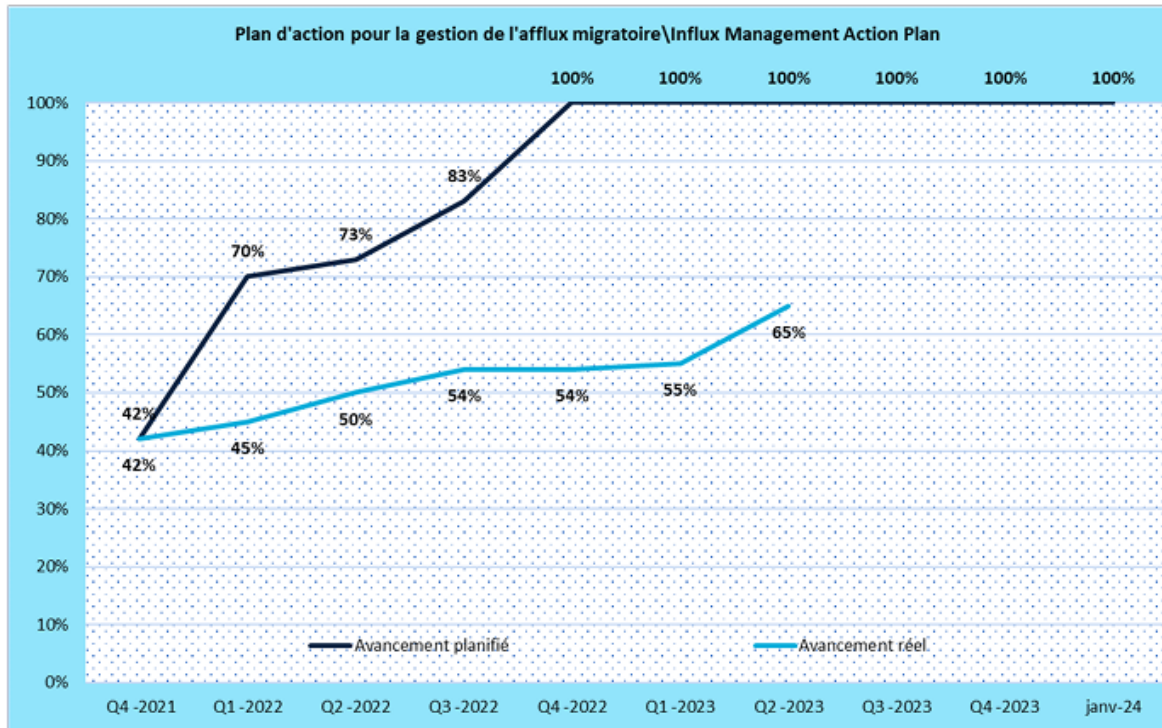


Figure 9-6: Influx Management Plan Action Plan Status as of 31 October 2023

The following actions are still underway and reporting delays:

- The engagement with government authorities and other stakeholders through periodic/annual consultation frameworks on the challenges, opportunities and risks associated with the influx of migrants into CBG's areas of operation. On this point CBG reported that difficulties in the tendering process for the recruitment of a service provider. Specifically, an initial invitation to tender was issued for the recruitment of a service provider to handle logistics during the organisation of the 6 consultation frameworks. Only 1 service provider submitted a bid, but following analysis it was not selected. A second call for tenders for logistics is underway. Contact has been made with a local NGO working in the field of migratory flows, with a view to a possible partnership.
- The analysis of the risks of migratory flows in the zones of occupation through a field survey in Kamsar and the South Cogon concession (including the town of Sangarédi and Daramagnaki) every 2 years. On this point, material shared for review by CBG indicates that an initial call for tenders was issued, with 3 service providers submitting bids, but none was selected after the bids were analysed. A second invitation to tender was issued, but only one bidder applied. No analysis was possible at the request of the legal department. A third call for tenders was issued to obtain more bidders. Tenders are awaited.

Preparation and finalization for the baseline study is the precondition for the implementation of the Influx Management Plan and the progress of all foreseen KPIs, such as:

- Population density, proximity to land used for agriculture, level of involvement in rural activities such as farming and livestock rearing.
- Access to health centres, electricity and drinking water, waste disposal practices. General state of the main public services provided (water, sanitation, waste disposal, electricity).
- State of diseases associated with the influx/increase in population density/pressure on infrastructure services such as infectious diseases (increase/static/decrease).
- Inflation rate trends (expressed as increasing, static/decreasing).
- Perceived increase/decrease in conflict and gender-based violence, e.g. due to alcohol, prostitution and worker behaviour. Changes in local conflict management.

To date, it is not possible to quantitatively assess the impact associated with influx. It is noted that in the meantime, CBG is supporting the communities through the following continuous actions:

- Permanent water and energy supply and free of charge to the towns of Kamsar and Sangarédi, though it is understood that the State has gradually taken over the supply of electricity to Kamsar, through the SOUAPITI electric dam since the beginning of the year.
- Granting access – for the residents of Kamsar and Sangarédi - to the ANAIM hospital in Kamsar and the CBG dispensary in Sangarédi, opened to all without eligibility criteria. These 2 facilities are the main health facilities in the two towns; in addition to these infrastructures, Kamsar and Sangarédi are home to 4 community health centres.
- Two health posts were built this year for the Wendou Mbouret Daramagnaki communities; with the renovation of another health post in Kolaboui.

Notwithstanding these activities, finalization of the baseline studies as well as the overall implementation of the Influx Management Plan are required as a matter of priority and delays should be minimized.

9.8 PS4 open findings

9.8.1 PS4 High open findings

Table 9-1: Summary of open high significance Findings, PS4

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_SO_010	Community Health and Safety – Mine site Safety	A fatality occurred on May 18th, 2022, in a sedimentation basin (reportedly N°4) at the Sangarédi mine site. This fatality was not reported to the IESC by CBG during the community health and safety sessions (held during each site visit). Following the site visit, CBG has shared the minutes of the meeting held after the fatality. No other documentation on the fatality was communicated to the IESC. On this occasion Lenders were not notified of the incident.	<p>Inspection programmes should be put in place to identify damage/vandalism of community safety measures e.g. installed fencing intended to restrict access to dangerous areas.</p> <p>CBG must inform the IESC of changes to the procedure following the drowning incident to ensure better communication of such event, and the measures should be put in place to ensure there are no repeated failures to notify Lenders when community incidents occur.</p>	High	Open (CBG has reported preparing an updated tracker for internal use which includes specific details on notification requirements, timeframes and internal reporting however this was not shared with the IESC)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

9.8.2 PS4 Moderate open findings

Table 9-2 Summary of open moderate significance findings, PS4

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_SO_006	Community Health and Safety - Railroad Safety	Pedestrians regularly cross the railway, and crossings have been observed even when a train was approaching, and a flagman (Homme Piquet) was in proximity of the area.	Additional awareness raising to be provided to flagmen to ensure a stricter control over railway crossing, while training them on the appropriate ways to interact with communities and to ensure smooth community relations.	Moderate	Open
Nov 2023_SO_007	Community Health and Safety - Railroad Safety	New community roads at the mine have been built by CBG in line with community consultation, and security posts were observed by the IESC to have been installed at the intersections; however, the intersection of haul roads and some old community roads were observed unguarded, with increased risk of incidents involving communities.	CBG should therefore ensure to close access to the old community roads, particularly if not guarded.	Moderate	Open
Dec 2022_036	Communicable Disease Prevention - HIV/AIDS	HIV/AIDS programme implementation still lags behind. In addition, based on the ToR, each annual campaign will take place in the 4th quarter of the year, between November and December.	HIV/AIDS Programme to be developed as a priority. Particularly in 2023, CBG not to wait for Q4-2023 to start the campaign as per indication in the ToR.	Moderate	Open (actions in progress, awaiting campaign implementation)
Dec 2022_037	Community Health and Safety - Railroad Safety	Betafences are now customs free and ready to be installed though new requests from local authorities now require prioritization of a truck "parking area".	Betafences installation to be installed as a priority	Moderate	Open (Betafence installation started; community acceptance has not been received in Kamsar and Kolaboui despite CBG's engagement efforts)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

9.8.3 PS4 Minor open findings

Table 9-3 Summary of open minor significance findings, PS4

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
June 2023_025	Community Health and Safety - Railroad Safety (livestock)	CBG’s Engineering Work Order dated June 12, 2023 stating that CBG’s CR team has been increasingly receiving doléances in relation to the installation of betafences to avoid loss of livestock that communities are experiencing along the railway in the area of Horé Lafou, Lafou Baila, Sakidjé, Parawol Malassi, Para, Correrah et Kalinco Pey.	In case betafence installation was feasible, specific engagements with the communities to verify their acceptability and absence of E&S impacts caused by the installation is required.	Minor	Open (while engagements with communities have occurred to discuss and measure length of betafence installation, the IESC will follow the installation to check if community concerns in terms of E&S impacts subsequent to the installation are recorded and addressed by CBG. Item downgraded to Minor).
June 2023_026	Community Health and Safety - Railroad Safety (livestock)	CBG’s Engineering Work Order dated June 12, 2023 stating that CBG’s CR team has been increasingly receiving doléances in relation to the installation of betafences to avoid loss of livestock that communities are experiencing along the railway in the area of Horé Lafou, Lafou Baila, Sakidjé, Parawol Malassi, Para, Correrah et Kalinco Pey.	CBG to assess the need for initiation of a multi-user fund to be used as compensation measure (or find a different solution) as alternative approach to the current management of these grievances.	Minor	Open (discussions ongoing to find alternatives)
Dec 2022_035	Communicable Disease Prevention - Malaria	Malaria programmes implementation still lags behind.	Malaria Programme to be developed as a priority	Minor	Open (actions in progress, awaiting campaign implementation. Item downgraded to Minor)
Dec 2022_038	Community Health and Safety - Railroad Safety (mobility)	Community concerns in relation to access to health centres, water planned to be managed via community development projects. Other criticisms exist on betafencing “dividing the city in 2 zones”.	CBG to continue engaging local authorities and communities to manage expectations and mitigate potential opposition to betafencing and closely monitor the use of footbridges and acceptance by	Minor	Open (lack of betafence’s approval in Kamsar and Kolaboui requires CBG to continue with engagement activities. The IESC will also monitor updates on

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
			<p>communities as the betafencing is erected.</p> <p>Attention to identify and record grievances concerning betafencing should be particularly paid.</p>		<p>“normative” solution as discussed between CBG and ANAIM.</p>
<p>March 2022_025</p>	<p>MUOA Project (mobility of PwD)</p>	<p>Use of stepped footbridges will prevent their use by people with physical disabilities. People unable to climb and descend steps will have to use level crossings.</p>	<p>Engage with communities to evaluate the number and residence of persons with reduced mobility (e.g. due to age or physical disability) that will not be able to use the footbridges.</p> <p>Explore mitigation measures to alleviate risk of pedestrian accidents, including physical separation of vehicles and pedestrians at level crossings.</p>	<p>Minor</p>	<p>Open</p> <p>(This item remains open and needs to be investigated through more structured engagement with PwDs, 2 meetings have been held with local association of PwDs, the IESC expects to see more structured engagement to further verify PwDs’s opinion on footbridges, and the need of additional gates – this is also considering the meeting with the community of Filima)</p>

The ‘closed’ legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report

10. PERFORMANCE STANDARD 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

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

Performance Standard 5: Validation of the Resettlement Policy Framework and resolution of PS5 systemic issues	
Associated open finding(s)	New: Nov 2023_RE_001, Legacy: June 2023_029, June 2023_031, June 2023_042, Dec 2022_047, Oct 2021_038

Significant progress has been made in resolving systemic issues related to resettlement during the second semester of 2023. Key developments are:

- Activities needed for the management of Land Acquisition and Resettlement have been incorporated into the CBG roadmap. A sponsor and a champion have been identified and now require formalization.
- Resettlement Workshop in Paris: A 3-day workshop took place in Paris in December 2023 with the objective of addressing ongoing resettlement issues. Participants included representatives from IFC, DFC, Ramboll, and key CBG staff: CBG Operations Director Acting HSEQ Director, Community Relations Manager, Reporting and Sustainability Manager, Resettlement Specialist, Resettlement Coordinator, and CBG Resettlement Consultant.

The implementation of the workshop action plan will be subject to monitoring in future IESC reports. **Regrettably, due to time constraints, the cumulative impacts of land acquisitions could not be addressed during the workshop. Nevertheless, this issue remains an area of concern (refer to section 10.7).**

- Resettlement Policy Framework: CBG will revise the latest draft to incorporate provisions agreed upon by the parties during the workshop. These provisions pertain to:
 - Compensation rates, which include indexation based on market value, annual updates with inflation, and a review every 5 years by a third party. The rate is applicable at the Project-Affected Person's (PAP) compensation certificate sign-off, with payment to be made within 6 months.
 - The streamlined process for temporary land acquisitions, lasting up to 3 years, with an impact assessment conducted to determine the necessity of livelihood restoration measures.

The updated Resettlement Policy Framework (RPF) reaffirms compensation for customary land ownership. CBG will submit the revised document by January 7th, 2024, for approval by lenders by January 17th. **A disclosure on the CBG website, recommended to include full information but with the exclusion of the compensation rate matrix, is expected by January 31st, 2024.** *Post visit note: The RPF has been formally agreed and a version uploaded to the CBG website in February 2024.*

- Permanent Resettlement Specialist/Manager Position: The position was filled in September 2023 after being vacant for two years. Contrary to the IESC's recommendation and the Expansion Project ESAP, CBG decided to designate the position as "Resettlement Specialist" instead of "Resettlement Manager." The IESC emphasizes the significance of a title in

gaining recognition and influence both within and outside an organization. The title "specialist" lacks a clear hierarchical status and is commonly associated with consultants. We recommend, at least, aligning the position title with existing roles that have managerial responsibilities, whether it is a "Superintendent," such as the Community Relations Superintendent, or a "Lead," as seen with the Environment Lead.

- Monitoring and Evaluation (M&E): An M&E Coordinator was hired in Q3 2023 and is now developing the M&E Plan.
- **Hamdallaye Security of tenure:** The lenders and CBG agreed on the path forward during the November 2023 IESC monitoring visit (see section 10.2)

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

10.2.1 Resettlement Physical Aspects

Performance Standard 5: Resettlement Physical Aspects	
Associated open finding(s)	New: NA Legacy: June 2023_031, June 2023_034, Dec 2022_042, March 2022_028, March 2022_032

Following preliminary discussions in June 2023, CBG indicated, during the November 2023 visit, **plans for a RAP completion audit in March 2024**. The audit would allow an official dialogue with the Community about the **closing of the physical aspects of the RAP** in a context where community members are continuing to ask CBG for repairs or work requests. **CBG also shared that the audit would include an assessment of the livelihood restoration status**. This would respond to the open finding suggesting additional food support in the absence of existing monitoring on PAP livelihood. The closing of the physical aspects of the RAP is also linked to the security of tenure issue described in detail below.

Hamdallaye

The IESC emphasized in previous reports the risk of CBG being perpetually weighed down by new requests from the Hamdallaye community until the transfer of ownership and security of tenure are completed and communicated. Indeed, the transfer of ownership for the houses and the integration of the village to the management of the Commune of Sangarédi is essential to:

- officially pass the new Hamdallaye territory under the management of the Sangarédi Commune and legally remove CBG from future liabilities (e.g. road maintenance, waste management);
- Proceed with the final acceptance of the houses by the PAPs
- Protect the PAPs property and land rights.

In an attempt to resolve the land tenure issue, CBG met the Minister of Urbanism on November 1st, 2023. The securitisation process would involve sending a team from the Ministry to determine the exact legal status of the land; and potentially the issuance of a presidential decree to declassify the land which could take more than a year.

The IFC team participating to the November IESC visit said they would accept the interim option proposed in the 2016 RPF, as long as the PAPs are granted with the appropriate legal land right at the end of the mining lease. The 2016 RPF stated "While no new land title can be granted on the mining concession, CBG will issue a land-use contract to resettled households recognising their

traditional land-right. This contract will be valid for the life of the mine. Subsequent to the extinguishment of mining title on resettled sites, CBG will support holders of a land-use contract in obtaining formal land-title through the Guinean government”. Therefore, the IESC will close the finding related to land tenure when the land-use contract will be provided to the PAPs. CBG indicated they will continue in parallel the formal process with the Urbanism Ministry.

CBG has completed all the construction scheduled in the RAP (and beyond) and now treats new infrastructure request as a community doléance. Requests for community infrastructure repairs are studied on a case-by-case basis. One example is the community centre, which is still not operational. According to CBG, equipment for the centre arrived in April 2023 but the door was deteriorated in an act of vandalism in May 2023 by some residents of Hamdallaye. Therefore, the equipment is now stored at the village chief’s house and the transfer of property is not yet effective. The Resettlement Committee on its side stated they cannot ensure the safety of infrastructure when ownership has not been officially transferred and are requesting a new door for the Center.

With regards to private resettlement dwellings, the remaining house repairs (exterior wall, door and window repairs) were conducted by contractor SIGMA in Q1 2023 and the final acceptance is scheduled for Q3 2024. Between June and November 2023, additional repairs were made to houses who suffered storm damage (roofs). CBG indicated that the Hamdallaye community has also asked for upgrade of interior walls, which has been registered as a doléance and under discussion. This case will need further investigation during the next visit as it is unclear if the deterioration is due to the poor state of exterior walls before recent upgrade (and therefore could be considered as the result of a construction defect and fall under a grievance) or not.

Fassaly Fouthabé

Outstanding work on Community infrastructure is completed.

The school remains unstaffed. However, CBG indicated that the threshold of 60 pupils, necessary for the allocation of a state teacher, has been reached thanks to the pupils of the neighbouring village. In the RAP, the school was supposed to cater for Fassaly Fouthabé and Mbouroré pupils but according to CBG, conflicts between the two villages resulted in Mbouroré parents choosing other schooling alternatives. It appears that the two communities have now resolved their conflict.

During December 2022 and June 2023 IESC visit, as well as through an official letter sent to CBG in October 2022, the Community of Fassaly Fouthabé express their request to be resettled. The community argues about the loss of land and the degraded living conditions (water, air quality, noise) caused by CBG mining operation. CBG, on its side, stated that the request was still under analysis and that they have come back to the Community to explain they will need more time to make a decision. However, evidence of communication with the village on this matter (minute of meeting or copy of letter) was not provided.



10.2.2 Hamdallaye and Fassaly Fouthabé Livelihood Restoration

Performance Standard 5: Hamdallaye and Fassaly Fouthabé Livelihood Restoration	
Associated open finding(s)	New: NA Legacy: June 2023_035, Dec 2022_043

CBG decided not to renew the contract with CECI after the termination of the June 30th, 2023, addendum. Instead, they chose to extend the Livelihood Restoration Program (LRP) for an

additional 3 years with a new provider. This decision was prompted by the unsatisfactory results of the approach and activities implemented by CECI, as outlined in several previous IESC reports. Expertise Sud has been selected as the new provider through a tender process, and the contracting process is currently underway. CBG anticipates the new provider to commence activities in January 2024. In the interim, CBG has enlisted three independent consultants, previously engaged by CECI, to ensure the continuity of ongoing LRP activities, including market gardening, poultry farming, and grass cutter breeding.

Expertise Sud will be responsible for assessing the sustainability of existing activities, addressing a recurring concern in CECI's program. They will also expand into other activities, adopting a different approach closer to Phénix's model, favoring an individual approach over a community-based one for livelihoods.

The vulnerability fund was not discussed during this visit and will be investigated in the next assessment. In the June 2023 visit, the Community of Fassaly Fouthabé raised concerns about the CECI-managed fund intended to support vulnerable groups through targeted projects. Since this fund was not utilized, and with CECI's contract concluding, the community requested that the funds be allocated to support vulnerable individuals. CBG mentioned that CECI proposed in-kind support, which the community declined.

Detailed status of Income Generating Activities (IGAs)

The status of Income Generating Activities (IGAs) is as follows:

- **Market Gardening:** The market gardens are now operational since October 2023 and were visited. The women both in Hamdallaye and Fassaly Fouthabé are well involved in the activity and supported by the consultants hired by CBG in the interim period between CECI's termination and appointment of the new provider Expertise Sud.

In Hamdallaye, two women groups, totalling 78 women, are working on their individual plots within the fenced market garden. Tomatoes, gombo and hot pepper are grown. Women reported coming to the area between 7 and 11 am in the morning and/or between 4 to 6 pm. The head of one of the groups said they were optimistic about the future of the activity and that two other groups of women from Hamdallaye are willing to join if the market garden is expanded. Some women would like to extend their plot. They are however complaining about a water issue but the consultant explained it was rather a misuse of the existing pump and tank system. They plan to sell a part of their production in Sangaredi market.

Prompted by the fear of the thieves and vandalism that occurred in the former market garden and in other CBG-funded LRP activities in Hamdallaye, the women have asked CBG to finance a guard for the first six months of their activity, with the idea that they will finance it themselves later using the the proceeds of their work. CBG has agreed.

In Fassaly Fouthabé, 9 women and 2 young males are involved in the market gardening. They are satisfied with the activity but point to difficulties watering crops and because of a hole in the fence made by a bulldozer. One of the market participants has bought a motor pump on its own fund for the market watering purpose but explain that they were struggling with pipe junctions. CBG indicated to the group that they could send a doléance to CBG for this particular case as CBG usually prioritizes requests when the Community is also contributing to the effort.

- **Poultry:** The Poultry farming activity is going on in Fassaly Fouthabé without incident, a new cycle of eggs sales having started in September 2023. In Hamdallaye, a large portion of the chickens died of disease and the remaining were sold by the community group in charge. The member of the group, mainly women, wish to relaunch the activity and CBG

agreed to finance 60% of the cost of a new batch of chicks, to take place in December 2023

- Grasscutters¹⁵: In Fassaly Fouthabé, a member of the community met at the market gardening site confirmed that the activity was ongoing without incident. The activity has been less successful in Hamdallaye in the past but the exact status was not discussed during this time visit.
- Small ruminants: A few goats were replaced in Fassaly Fouthabé in July 2023 following death accounts. The remaining budget for this activity was transferred by CECI to CBG and should be used by the Community for the purchase of goats in Gaoual, an area renowned for its livestock activity in Guinea.
- Bakery: Despite CBG efforts, including important additional infrastructure and working capital investments in 2022 and 2023, the bakery activity has not resumed. Discussions are ongoing with the Commune about the future of the infrastructure.
- **2ha pasture land:** The pasture land is not part of the Program but a CBG response to an old grievance from herders.

The construction of the fencing, drinking troughs, a borehole equipped with an electric solar pump, a shelter and a latrine were built in Q1 2023 and the provisional acceptance done in August 2023. The planting of trees and fodder species were also provisionally accepted in August 2023 and a monitoring is scheduled for a 6-months period. The keys were given to the Community. However, the poly tanks, the solar panels and the submersible motorpump were stolen in October 2023. To date, the pasture land gate remains closed and unused.

- 56ha of restored agricultural replacement land: The 56ha agricultural replacement land have been discussed in past report due to the difficulties met in restoring the quality of the land. The last conclusion was, back in 2021, that a 2-year fallow period was necessary for the soil to regenerate. The official hand over of the area took place in August 2023. CBG informed the IESC that Hamdallaye communities requested the company to change the classification of the land to urban land for construction and potential sale. CBG replied this was not their prerogative. Given the vicinity of the New Hamdallaye to Sangaredi, the already observable development of the town toward Hamdallaye and of the new socio-economic dynamic in place in the village, the expansion of Hamdallaye urban zone appears inevitable.
- **Phénix¹⁶ LRP activities in Hamdallaye and Fassaly Fouthabé:** resident PAPs impacted by other CBG Plateau landtakes entered the process of LRP implementation managed by Phénix.

Recommendations – Hamdallaye and Fassaly Fouthabé RAP

The IESC acknowledges that CBG has closed a number of past findings related to the RAP or is progressing towards others. The following actions remains open:

- bring forward the land tenure schedule
- **Prepare a long-term assessment of the situation of the cumulative impacts of mining and hauling around Fassaly Fouthabé, consult with the Community and the authorities and make a decision, aligned with PS1 and PS5 requirements, regarding the resettlement of the village** (see also Section 6.6, Identification of Risks and Impacts).

¹⁵ Grasscutters are a species of African cane rats (rodents)

¹⁶ Phénix is a Conakry-based consulting firm which was awarded a contract for several LRPs implementation

- Given the extended timeframes discussed above, the IESC recommends an external interim audit of the RAP, including LRP to i) close the physical aspect of the RAP and ii) document and assess the status of PAP livelihoods;
-

10.3 Livelihood Restoration Programmes (LRPs)

10.3.1 Status of the LRPs

Performance Standard 5: Status of LRPs	
Associated open finding(s)	New: Nov 2023_RE_002, Nov 2023_RE_003 (mentioned in PS1), Legacy: NA

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

Table 10-1: LRPs in progress (as of November 2023)¹⁷

LRP name	#PAPs	LRP status	Implementation status
MUOA	255 ¹⁸ [1]	Approved	On-going through Phénix
Kankalaré	474	Not approved by lenders	On-going through Phénix
Plateau Thiapikhouré	156	Not approved by lenders	On-going through Phénix
Contingency blocks	77	Not approved by lenders	On-going through Phénix
Plateau Kagnaka and Parawi extension	724	Not approved by lenders	Contract signed with Phénix for implementation
Plateau Mbourore	1297	In development	NA

During the site visit, CBG informed the IESC that the LDP process for block Parawi 3b will soon resume. The process was halted after intense speculation behaviour was observed when information about a potential future exploitation circulated. CBG indicates that follow-up discussions with the Communities took place before considering relaunching the LDP process. It is not known yet if the future land acquisition will lead to a new LRP development or will be included into an existing LRP.

¹⁷ Post site visit note: final version of LRPs were communicated to the lenders in January 2024.

¹⁸ This number is the number of PAP economically displaced in the MUOA RAP (which includes a total of 415 PAPs)

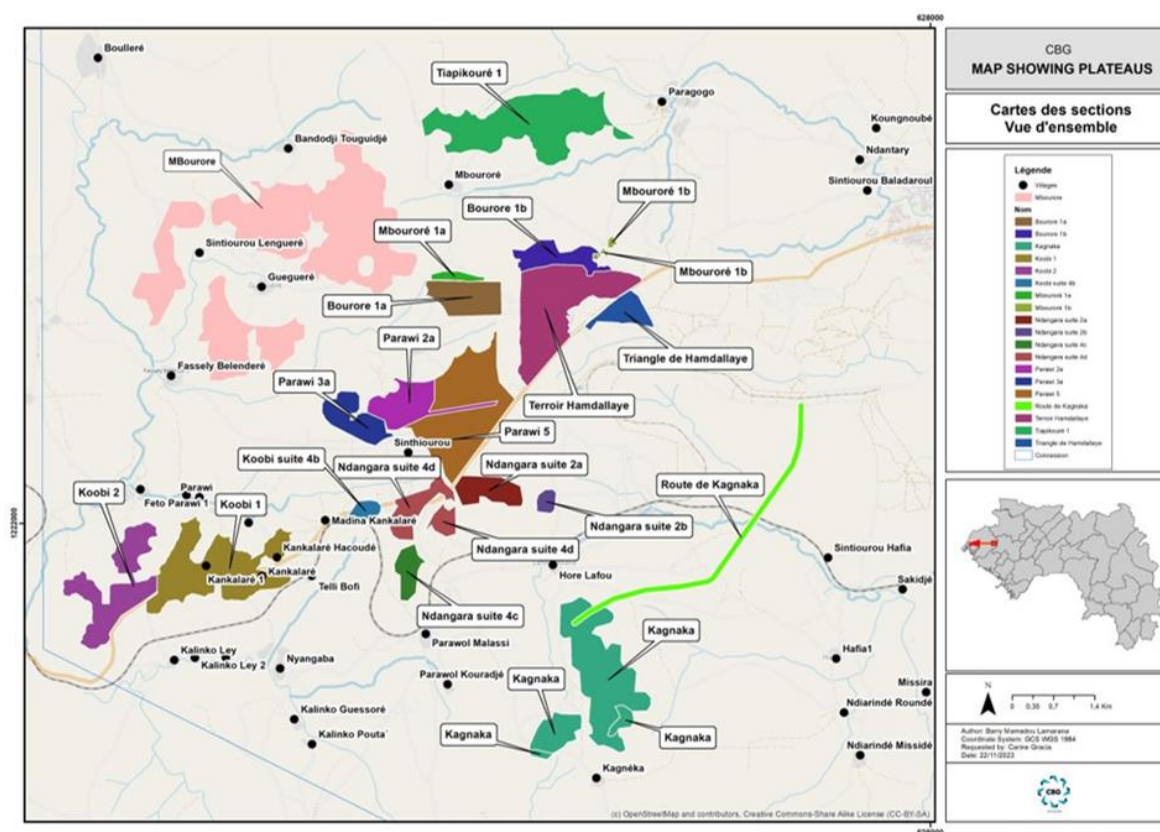


Figure 10-1 Plateaus under current operation and future operations

Validation of the LRPCs

With the exception of MUOA and Hamdallaye & Fassaly Foutabé, none of the Livelihood Restoration Plans (LRPs) had received approval from lenders as of November 2023, despite implementation being underway. CBG has rephrased the LRPCs to align with the current on-field practices, and it has been decided during the Paris Resettlement workshop to validate them in their current form. Few comments discussed during the workshop will be integrated into new versions, scheduled for submission and approval in early January 2024.

Post visit note: LRPCs were approved by Lenders in February 2024).

Compensation process and LRPCs

While there has been progress in reducing the time between land acquisition and the development and implementation of LRPCs, there remains a delay between compensation and LRPC implementation. Compensation is ongoing for Mbouroré, while the LRPC is still in the development stage. In the case of Kagnaka, the LRPC implementer initiated the diagnosis PAP survey in October 2023, while the asset inventory occurred in February 2021. As per the current practice, compensation in CBG LRPCs has been limited to assets such as crops, plantations, or preparation costs (in the case of cleared agricultural land), with no provision for customary land ownership. Similarly, community grazing land has not been compensated. This issue was a focal point of discussion during the December 2023 workshop in Paris (see Appendix 3, ESAP #21)

The compensation register was examined through a CBG compensation presentation during the IESC visit and enquiry was made about the development of an LRPC for a non-temporary land acquisition called "brownfield" (understood to be plots of land never used in the vicinity of mine activity). CBG stated its intention to incorporate the 59 PAPs from the "brownfield" compensation event into existing LRPCs, provided they are not already covered by the LRPC of another land

acquisition event. CBG provided the minutes of meetings held in December 2022, which announced the inventory to the “brownfield” affected communities. These meeting minutes documented the outcomes of focus groups organized by CBG involving women, youth, and elders to gather their concerns and grievances. However, there was no discussion about participation in a livelihood restoration program. In the upcoming visit, the IESC will monitor their integration into an LRP and assess how cumulative impacts are considered for PAPs already included in an another LRP.

Compensation payment

During the November visit, Kagnaka and Guéguéré communities indicated a delay of 7 to 8 months in compensating individuals after the inventory. The newly hired resettlement specialist informed the IESC that one of his objectives, in collaboration with relevant departments, is to reduce compensation payment delays by streamlining and optimizing the internal compensation procedure. While this issue is not critical as PAPs can still access their land during this period, expediting the process would minimize the internal administrative burden for CBG personnel, enhance the relationship with the community, and allow PAPs to focus on their new livelihood strategy sooner.

Regarding payment methods, CBG mentioned that small amounts, up to 2.5 million Guinean Francs (approximately US\$275), are now paid to PAPs in cash. This decision was in response to community requests, as opening a bank account or traveling to a bank in the nearest town was deemed not worthwhile for smaller compensation amounts.

10.3.2 LRPs implementation by Phénix

Performance Standard 5: LRPs implemented by Phénix	
Associated open finding(s)	New: NA Legacy: June 2023_036

LRPs awarded to the Conakry-based provider Phénix include the MUOA LRP, the merged LRP of Kankalaré, Contingency block, and Plateau Thiapokhouré, as well as the Kagnaka-Parawi LRP. A total of 1569 Project-Affected Persons (PAPs) are enrolled across the three LRPs. The focus of the November 2023 visit centered on recent land acquisitions related to Kagnaka and Mbouroré Plateau, rather than the ongoing implementation of LRPs. Despite this, Phénix delivered a presentation during the IESC visit to provide updates on their work.

Both Phénix and CBG indicated that Livelihood Restoration Committees are now established in each impacted village and are overseeing the implementation process.

Phénix continues to follow their program with the same approach: individual-based with limited infrastructure investment (rather than the community-based approach with costly infrastructure that failed in Hamdallaye), emphasizing the use of local materials and the enhancement of existing techniques, along with the application of bio-pesticides for agriculture. Rather than creating new activities, they collaborate with community members engaged in existing activities such as agriculture, animal breeding, small commerce, or services. As suggested in previous IESC reports, the scope of intervention has been expanded to include other non-agricultural activities classified as "support to small trade jobs" and vocational training. Training in defensive and heavy equipment driving has taken place for a group of PAPs in Q3 2023, with some having secured employment. In response to a question about opportunities for women, who often have fewer existing qualifications than men to build on, Phénix and CBG explained that they were exploring agricultural product processing options for women.

MUOA LRP

Activities commenced in Q1 2023 following a diagnostic phase and approval of a program design by CBG, and they are now entering the second and final year. The MUOA LRP has a duration of two years, in contrast to the three-year duration of the other LRPs, owing to the limited size of the impacted land per PAP. Out of 255 eligible PAPs for the MUOA, 231 enrolled in the program, as the remaining 24 couldn't be located or were identified as being on a seasonal move. Some PAPs are residents in Conakry and have requested assistance in Conakry, but this has been denied. Additionally, 29 PAPs were assessed as vulnerable by Phénix. As the LRP enters its final year, Phénix is in the process of developing a disengagement plan. CBG will need to plan for the LRP final assessment.

Kankalaré, Thiapikouré and Contingency blocks merged LRP

The three LRPs have been consolidated and are now adopting the same approach as the MUOA LRP. In the June 2023 IESC monitoring report, the number of enrolled PAPs was 641. This figure has since increased to 714 PAPs enrolled, out of a total of 756 PAPs deemed eligible. 16 PAPs were assessed as vulnerable. The implementation of the LRP commenced in Q2 2023 after the completion of the diagnostic phase¹⁹.

Kagnaka and Parawi Extension LRP

Phénix initiated the diagnosis phase in October 2023, following the signing of a contract extension with CBG to incorporate the Kagnaka and Parawi Extension LRP into their existing scope. As of the visit date, 474 PAPs had already been enrolled, with 150 remaining to be surveyed. The commencement of activity implementation is scheduled for February 2024.

10.3.3 Mbouroré LRP

Asset surveys commenced in Q4 2022, and as of the visit, compensation payments were 40% complete. In August 2023, a one-year contract was signed with CEMED for the LRP design, which is still in progress. A total of 1297 individuals and 713 ha (both agricultural and grazing land) are affected by the Mbourore Plateau.

Due to time constraints during the visit, no additional information was gathered on the specific study CBG mentioned as being in preparation in June 2023 regarding the occupation of a seasonal pastoral camp located on the Plateau. The status of the study will be revisited during the next IESC meeting.

10.3.4 Recommendations regarding LRPs

Performance Standard 5: Recommendations regarding LRPs	
Associated open finding(s)	New: Nov 2023_RE_002, Nov 2023_RE_003 (mentioned in PS1), Nov 2023_RE_004, Nov 2023_RE_005 Legacy: NA

- Review LRP and/or LDP process to include formal social impact assessment (including impact on community health & safety, livelihood outside of agricultural production and cumulative impacts) and agreement with the community on mitigation measures.
- Reduce the compensation payment lead time after inventory by reviewing internal procedure

¹⁹ The diagnostic phase includes a PAPs socio-economic survey and consultations to design the Program activities

- Investigate addition livelihood restoration options for women, such as agriculture product processing or crafts.
- Consult with Boulléré on the extent of the land acquisition by PAPs from other villages and potential impacts on the village

10.4 Exploration

10.4.1 South Cogon

Four blocks representing less than 10ha and less than 2ha of agricultural land impacted in the area north of the village of Mbouroré adjacent to the COBAD Road (see Section 10.3.3). The compensation process of the 9 PAPs was completed in October 2023.

10.4.2 North Cogon

As of June 2023, an Environmental and Social Impact notice was under development for the prospection phase and early work and the LDP process started. During this prospection phase, a feasibility study will be completed for the infrastructure and if conclusive, an Environmental and Social Impact Assessment will be conducted. The status of this notice will be investigated during the next IESC monitoring visit.

An agreement was found with the Communities for the installation of fly camps (fixed setting for the time of the campaign December 2023 to May 2024). The temporary land take will affect 199 PAPs and 41ha of agricultural land. CBG reported that compensation payment was completed in September 2023.

10.4.3 Recommendation for exploration

Performance Standard 5: recommendation for exploration	
Associated open finding(s)	New: Nov 2023_RE_006 Legacy: NA

Community meetings with Guéguéré and Kagnaka during the November visit revealed that community members were approached by non-community members as soon as the exploration stage commenced, to sell their land in prevision of future compensation. CBG confirmed individuals not from the impacted villages were found in all the Plateau land acquisition events. Furthermore, CBG also observed practice that appear to be linked to a misunderstanding of the principles for compensation. There is an important number of cases reported where the land owner or land user split his land between family or acquaintance with the idea that the compensation amount was based on people and not on size. As a result, the true land owner/user will receive a small compensation amount commensurate to the now reduced size of his plot, with little money available for the investment in new productive asset.

The IESC therefore encourage CBG to increase awareness of the LDP/compensation process in case of future mining exploitation as early as the exploration stage.

10.5 Cumulative Impacts

Performance Standard 5: Cumulative Impacts	
Associated open finding(s)	New: NA Legacy: Dec 2022_047

Unfortunately, this subject could not be discussed during the Paris workshop for lack of time. Therefore, the IESC reiterates the need to identify and assess cumulative impacts on a number of communities that was discussed in the past IESC reports. CBG indicated the status of this analysis to be in progress but not finalized.

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

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

The IESC recommends making such an assessment on the communities that were listed as villages potentially affected by a physical resettlement by 2022 in the 2015 RPF, namely: Fassaly Fouthabé, Parawi, Guéguéré, Kagnéka, Horé Lafou, Sintiourou Kourawel, Kourawel Center, Parawol Aliou and Parago plus adding Mbouroré to this list. If CBG human resources are not sufficient to conduct the assessment, the IESC recommends hiring consultants to perform this task.

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

In the absence of a robust assessment regarding the cumulative impacts of each of the mentioned villages, the risk that livelihood restoration will not be possible for some communities is considered to be high with the potential that communities will be dependent on CBG for survival (through continuous food assistance) and that grievances multiply.

10.6 Grievances

Performance Standard 5: Grievances	
Associated open finding(s)	New: NA Legacy: Dec 2022_046

Section 6.3 is dedicated to the grievance mechanism and this section 10.6 will only address grievance management performance linked to land acquisition/PS5 (categorized under Resettlement in the CBG new grievance classification).

During the visit meetings with Guéguéré and Kagnaka, the communities confirmed that CBG had organized sessions to present the grievance mechanism and that they feel comfortable using it.

According to CBG material, 72 grievances related to resettlement were registered in 2023 (up to October 31st) from which 50% had been closed and 50% were still being processed. :

- 35% related to LRPs.
- 58% related to compensation. In the past reports, the IESC discussed the problem of recurrent landtake during land stripping. In June 2023, CBG announced that a new process was put in place during land stripping in an attempt to solve the problem. Two new grievances for land takeover were still registered between July and October 2023. However, it is a decrease from past periods. The IESC will monitor future grievances.
- 6% related to inventory and eligibility
- 1% to infrastructure (Hamdallaye RAP)

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

Performance Standard 5: ESAP 21, historic land takes and retrocession of rehabilitated land	
Associated open finding(s)	New: NA Legacy: June 2023_042,

The ESAP #21 item (a review of the resettlement events undertaken by CBG between 2016 and the adoption of the updated RPF), historic land takes and land rehabilitation have been the subject of findings in past IESC reports and were at the heart of the discussions during the December 2023 Paris resettlement workshop. The following was agreed between the lenders and CBG:

10.7.1 Historical land acquisition and resettlement

Historical land acquisition refers to the pre-loan agreement era, between 1973 and 2016. CBG is declared not accountable for PS5 non-compliance before the signature of the loan agreement (2nd September 2016). During that period, land acquisitions were solely subject to compliance with Guinean law. In anticipation of the CAO mediation on land and to mitigate residual risks associated with historical land acquisitions, CBG will prepare and release a clarification paper in response to the 2010-2015 Past Compensation Report (ESAP #17). This document will delineate the nature, extent, and approach of historical land acquisition and emphasize the use of the grievance mechanism to address potential grievances from communities related to this period (a practice already in progress). The position paper will be shared with lenders for informational purposes by the end of January 2024.

10.7.2 2016-2023 land acquisition and resettlement

Policy lenders emphasized that Performance Standard 5 (PS5) applies to the entire period from the date of the loan agreement signature to present. During this time, CBG has been non-compliant by failing to compensate for customary-owned land. These land acquisitions encompass approximately 2,400 hectares and involve around 2,000 Project-Affected Persons (PAPs), pending confirmation. CBG will compile a database of affected individuals by April 30th, 2024, submit a

mitigation strategy to the lenders by May 2024, and ensure complete implementation of measures by June 2025 at the latest.

A small portion of the land acquisition events during this period were not covered by a Livelihood Restoration Plan, contravening the requirements of PS5. The number of PAPs would be around 200. The affected individuals will be integrated into either existing CBG livelihood restoration programs or new dedicated programs. By April 30th, 2024, CBG will establish a database of affected persons, including information on their livelihood restoration status. By [August 31th, 2024], CBG will provide evidence that these individuals have been incorporated into a livelihood restoration program.

10.7.3 Land rehabilitation and handing-over options.

Performance Standard 5: Monitoring	
Associated open finding(s)	New: NA Legacy: Oct 2021_038

CBG will generate a report/map outlining the status of the rehabilitation of restored lands by January 15th, 2024, and commence a scoping exercise to explore potential options for transferring rehabilitated land to the communities. These options will be deliberated upon during the upcoming IESC visit, scheduled for around April-May 2024.

10.8 Monitoring

A Monitoring & Evaluation Advisor was hired in Q3 2023 and was introduced to the IESC during the November visit. He is currently working at developing the CBG resettlement M&E Plan which has been the object of an open IESC finding since 2021. The plan is expected for the end of Q1 2024.

10.9 PS5 open findings

10.9.1 PS5 High significance findings

Table 10-2: Summary of open high significance findings, PS5

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
June 2023_029	Resettlement systemic issues	Some critical findings have been stalling for several years (RPF update, Hamdallaye security of tenure, cumulative impact, retrocession of rehabilitated land, monitoring, LRP validations, staffing of the resettlement team). Part of these findings requires inputs and/or actions and/or approval from other CBG departments.	Resettlement Management is integrated in the CBG roadmap, with sponsors and champions supporting the Resettlement department in tackling the high significance systemic issues. The implementation of key actions should be tracked in the same manner adopted for other management plans/actions plans already within the scope of the current Road Map.	High	Open (progress made, however, closure pending official nomination of sponsor and champion)
June 2023_031	Hamdallaye Resettlement Site	Land tenure is not yet secured for Hamdallaye new village with consequences of: <ul style="list-style-type: none"> • lack of land securitisation for the PAPs; • impossibility to conduct the final acceptance of the houses by the PAP; • impossibility to transfer the management of the village to the Commune (including solid waste management which was subject of a past finding); and • Impossibility to close the physical aspects of the RAP 	CBG has developed a way to address this issue. Complete the land tenure formalization and securitization process as per schedule agreed between the CBG Resettlement and Legal teams. Given the lack of progress since December 2022 visit and the criticality increasing over time, the significance is raised at High	High	Open (The IFC team participating to the November IESC visit mentioned they would accept the land-use contract to resettled households in the interim, as per proposed in the 2016 RPF. This finding will be deemed closed following the submission of the signed contracts)

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
June 2023_035	Hamdallaye and Fassaly Fouthabé RAP	The absence of an assessment of the livelihood restoration status of the PAPs, the lack of cumulative impact assessment, the limited results of the CECI Program and the delay before the new LRP program will start again justifies a new food interim support.	Plan an additional interim support (food assistance) until LRP activities produce revenue for the PAPs	High	On Hold (While CBG express reluctance for food support, the IESC is waiting for the livelihood status assessment scheduled in the RAP audit)
June 2023_036	Other LRPs	The delayed implementation of the Kankalaré, Thiapikouré and Kagnaka LRPs (compared to the compensation date), the potential lack of remaining agricultural land expressed by the Community (and not verifiable in the absence of a cumulative impact assessment) justify the requirement for renewed interim support (food assistance)	Plan an additional interim support (food assistance) until LRP activities produce revenue for the PAPs	High	On Hold (While CBG express reluctance for food support, the IESC will review more carefully the M&E results of LRP during next visit)
June 2023_042	Retrocession of rehabilitated land	<p>October 2021 finding raised at the High significance level in June 2023:</p> <p>CBG has no formal procedure for managing mined land rehabilitation, with respect to community involvement and relinquishment issues, despite the Mine Rehabilitation and Conceptual Closure Plan (MRCCP) presenting priority actions to begin by end 2018 (with one to be completed by end 2018)</p>	October 2021 recommendation, still valid: Work to be initiated immediately to formalize CBG’s current practice, for managing mined land rehabilitation and relinquishment, into a written procedure which includes not only key actions and responsibilities, but also standardized documents, to be signed by all parties, which record agreements reached/actions completed. This procedure to take account of the good practice guidance and/or recommendations, presented in the MRCCP, relevant to mined land rehabilitation and relinquishment	High	Open

CBG BAUXITE MINE

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Dec 2022_047	Cumulative impacts	Several communities appear to be surrounded by mining activities in current mine plan	<ul style="list-style-type: none"> Prepare an assessment of the situation of the cumulative impacts of mining and hauling around the communities that were listed as villages potentially affected by a physical resettlement by 2022 in the 2016 RPF Conduct assessment in coordination with the Biodiversity team Minimize footprint as per IFC PS1 requirements 	High	Open
Dec 2022_042	Fassaly Fouthabé	Fassaly Fouthabé has officially requested to be resettled	Prepare a long-term assessment of the situation of the cumulative impacts of mining and hauling around Fassaly Fouthabé using ArcGIS, consult with the community and make a decision to respond to the request.	High	Open
Dec 2022_043	Hamdallaye and Fassaly Fouthabé RAP – Livelihood Restoration	Current activities do not meet their intended objectives	<ul style="list-style-type: none"> Acknowledge the reluctance of members to continue with the bakery, small ruminants and grasscutter (in Hamdallaye for the latter) and consult with Community to close these activities. Maintain market gardening and poultry activities but rethink model, and potentially finding a partner. Broaden the scope of livelihood restoration to more non-agricultural activities. Target the youth through employability and vocational training. 	High	Open (pending beginning of activities of new provider scheduled for December 2023)
March 2022_032	Fassaly Fouthabé	School constructed as per the RAP but remains unstaffed.	While continuing to liaise with the local education directorate to obtain allocation of teachers for the school, explore alternative avenues with the community (e.g. "maîtres communautaires").	High	Open

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Oct 2021_038	Monitoring (CRPF)	CBG has developed preliminary framework for monitoring. This framework is not consistent with the "Monitoring" chapters in the CRPF and the LRPs, and, also, it mostly focuses on progress indicators and not outcomes	Refine the monitoring system (indicators, methods, frequencies) on the basis presented in the CRPF and the baseline sections of the LRPs (taking into account the generic Policy Lender/IESC comments [18 October 2021]), on the Kankalaré RLRAP), (ii) distinguish progress from outcome (or impact) indicators and (iii) create a dedicated monitoring function within the team and resource it accordingly (at minimum, one full-time staff member)	High	Open (pending development of the M&E Plan in Q1 2024)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

10.9.2 PS5 Moderate significance findings

Table 10-3 Summary of open moderate significance findings, PS5

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_RE_004	Other LRPs	Women may have less opportunities in a LRP approach built on existing qualification or savoir-faire	Investigation additional options for women livelihood restoration activities, such as craft or agricultural product processing	Moderate	Open
Nov 2023_RE_005	Indirect impacts of land acquisition	Several PAPs both in Guéguéré and Kagnaka communities indicated having bought land in Boulléré (currently not affected by Plateau mining)	Consult with Boulléré Community to investigate the extent of the PAPs land acquisition in the village and potential positive and negative impacts	Moderate	Open
Nov 2023_RE_006	Exploration	PAPs in Guégué and Kagnaka explained having been approached to sell their land by people external to the villages during exploration time. Moreover, some speculative practices tend to demonstrate a lack of understanding of the principles of compensation	Raise awareness of the community about speculative behaviour and the compensation principles as early as when approaching a community for future exploration work.	Moderate	Open
June 2023_033	Hamdallaye and Fassaly Fouthabé RAP	The ToRs for an LRP extension are being drafted. One of the lessons learnt from CECI LRP Program and other LRP programs going on is an increasing demand for additional support not planned and a difficulty for PAPs to understand the extend of CBG commitments.	Clarify the commitments and criteria of success for the LRP extension with PAPs	Moderate	Open (New provider contract scheduled for December 2023, then engagement with the PAPs can start)
Dec 2022_046	Grievances	Land takeover during land stripping activities is accounting for a large number of grievances	Implement identified mitigation measures and monitor related grievance evolution	Moderate	Partially close/open (number of related grievance has decreased but wait for a 6-month period without related grievance to close)

The 'closed' legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

10.9.3 PS5 Minor significance findings

Table 10-4 Summary of open minor significance findings, PS5

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_RE_001	Human Resources	CBG has hired a “Resettlement Specialist” rather than a “Resettlement Manager” as expected by the lenders. While the IESC understand that the Specialist has some managerial prerogative, this title may be an obstacle for internal and external influence.	Either grant the title Resettlement Manager to the new resettlement specialist along with managerial powers/responsibilities as per the expansion ESAP or seek a derogation/acceptance from the Lenders.	Minor	Open
Nov 2023_RE_002	Compensation payment delays	Delays between asset inventory and compensation payments were around 7-8 months for the latest Plateaux according to Guéguéré and Kagnaka communities. While the community can still access their land during this period, these delays remains a burden for CBG and for the Community.	Streamline the internal compensation procedure to reduce delays	Minor	Open
June 2023_034	Hamdallaye and Fassaly Fouthabé RAP	A completion audit is scheduled at the end of the RAP, including LRP. The LRP is being extended for 3-year which would postpone the completion audit whereas the physical component of the RAP is completed (except for the security of tenure) and there is an absence of formal monitoring/assessment of the current livelihood restoration status of the PAP	Consider an external interim audit of the RAP, including LRP to: 1) close the physical aspect of the RAP; and 2)document and assess the status of PAP livelihoods	Minor	Open (scheduled for March 2024, pending land tenure formalisation)
March 2022_028	Hamdallaye Resettlement Site	Drainage issues partially fixed but some problems remain, resulting in localised flooding, with potential damage to structures as a result.	Monitor potential flooding during the rainy season and plan corrective works accordingly.	Minor	Open (pending 2024 small corrective work needed after 2023 rainy season)

The ‘closed’ legacy findings from early IESC monitoring visits are provided in [Appendix 2](#) of this report.

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

11.1 Introduction

The biodiversity component of the site visit was achieved through a series of meetings between the IESC biodiversity specialist and the CBG Biodiversity team, as well as field visits in the South-Cogon concession. Key topics are discussed in Sections 12.2 – 12.7 with Section 12.8 providing the locations and site-specific information which informed this report.

11.2 General Progress Update

Performance Standard 6: General Progress Update	
Associated open finding(s)	New: Nov 2023_BI-003 Legacy: NA

Progress on this roadmap item was on target at the time of the November Site Visit with CBG stating 98% completion. There are no significant outstanding items with 58 of 60 items completed, continuous or ongoing. The two items listed in the roadmap tracker provided to the IESC in November 2023 as “not started” involve annual review and updates to the BMEP and No Net Loss/Net Gain (NNL/NG) Tracker planned for early 2024.

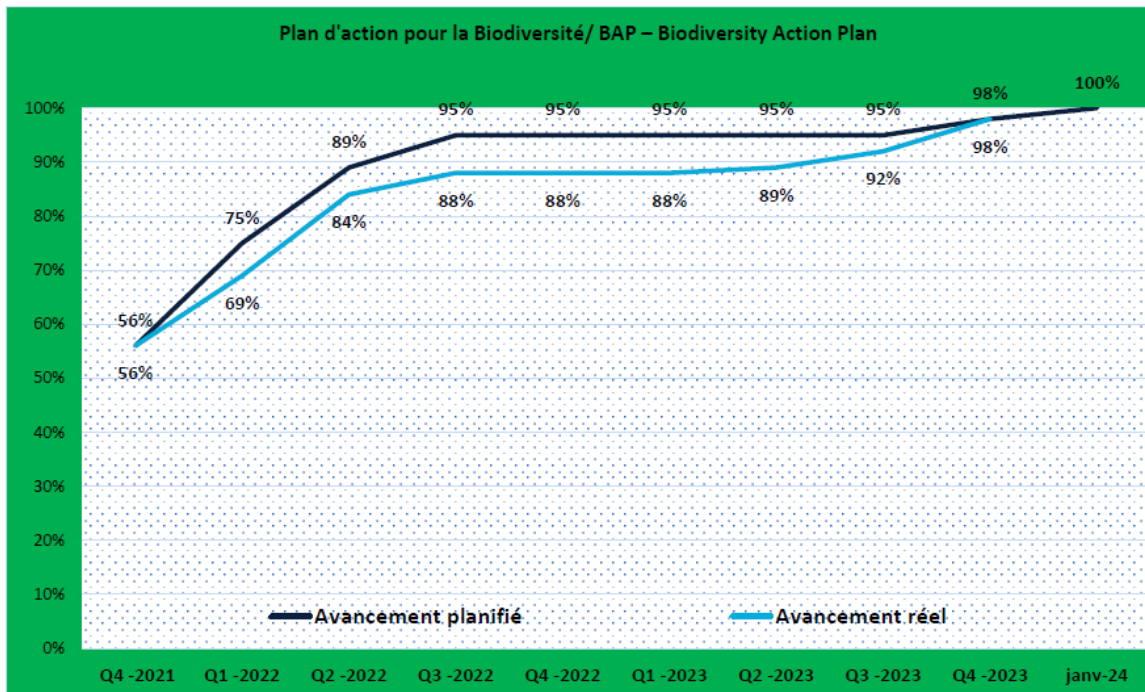


Figure 11-1: Biodiversity Roadmap Progress

However, despite the good progress and considering various actions in more detail, the IESC biodiversity specialist believes that CBG is unlikely to achieve 100% by January 2024. There are individual actions which whilst far advanced and actively progressed, are not yet at 100% completion. Two relate to ESAP Item 28: The Integrated Landscape Management Plan (ILMP), which the IESC biodiversity specialist and Lenders have now provided final comments and it awaits

internal CBG finalisation. As such, the actions for completion of the plan itself and creation of set aside zones at Boullère and Kourakoto are at 80% and 90% completion respectively. Training of all CBG staff is stated to be 80% completed. The least progressed action is that for the Moyen Bafing offset management plan at only 40%. The delay rests with the body overseeing the offset rather than CBG, as the biodiversity manager informed the IESC biodiversity specialist of the efforts being made by CBG to move the process along.

11.3 Staffing and Equipment

Performance Standard 6: Staffing and Equipment	
Associated open finding(s)	New: Nov_2023_BI_002 Legacy: NA

The attendees from the CBG Biodiversity team were:

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

The team continues to be extremely knowledgeable on the key issues for the Project helped greatly by the continuity of staff within the team for a long period. The proposed future structure of the biodiversity team was discussed with the IESC biodiversity specialist. It involves the promotion of one of the current team to team lead to replace the current Biodiversity Manager who will leave the post mid-2024. The timescale for that departure was extended to allow the team more time to make the necessary changes and thus ensure a smooth hand over. The vacancy created by the aforementioned promotion will be filled by a new hire to ensure that there remain four key specialists in the team each with different external contractors or junior staff reporting to them.

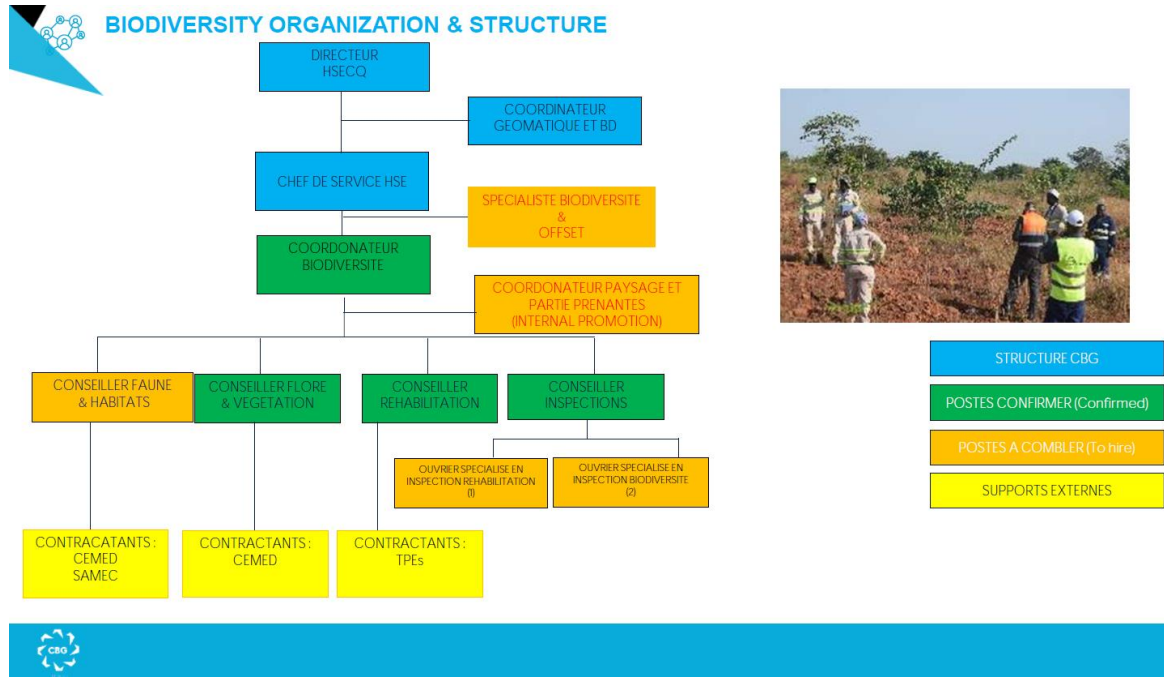


Figure 11-2: Proposed Biodiversity team Structure for 2024

The proposed staffing structure from the team is largely as presented to the IESC biodiversity specialist during the June 2023 site visit. Unfortunately, it seems that progress has not been made on filling of the posts requiring new hires. CBG must progress these hires as a priority, particularly given the upcoming departure of the current Biodiversity Manager. On a more positive note, the IESC biodiversity specialist was informed that the contract, to extend The Biodiversity Consultancy (TBC) contract for a further three years to support with the BAP activities, has been agreed.

11.4 Moyen-Bafing Offset

Associated open finding(s)	New: Nov 2023_BI-003 Legacy: NA
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Whilst the offset is subject to independent audit by RINA, not the IESC, given its relevance to the project, CBG provided the IESC biodiversity specialist with an update on progress at the Moyen-Bafing offset site being established for chimpanzees.

The World Chimpanzee Foundation (WCF) has been the implementing party for the offset since commencement, but that contract finished at the end of 2023. The IESC biodiversity specialist has requested an update from CBG on the proposed future management of the offset because whilst the CBG biodiversity team continues to be extremely active in driving the offset forward, the other factors required for its success should be understood.

11.5 Biodiversity Inspections

11.5.1 Kagnaka Haul Road

As it was the key new activity undertaken on site in 2023 and was not seen during the June 2023 visit, the review of biodiversity inspections focussed on the new Kagnaka Haul Road. All inspection

reports relating to monthly inspections of the works during 2023 were reviewed by the IESC biodiversity specialist and a number of locations along the road were visited during the site visit.

In general, the work has been completed to a high standard with good protection of biodiversity. The IESC biodiversity specialist saw the following features (see also section 12.8):

- Road routed through the lowest quality and narrowest part of a gallery forest;
- Protection of two watercourse source points; and
- Sediment control measures.

Based on the inspection reports provided to the IESC biodiversity specialist to review, no significant impacts on biodiversity have occurred to date. Occasional minor non-conformities relating to litter, sedimentation of water and erosion control were identified during some visits but are reported and shown with photographic evidence to have been addressed by the time of the following visits. This demonstrates the value of the inspections to ensuring adherence to good practice.

11.5.2 Parawi stockpile

Performance Standard 6: Biodiversity Inspections	
Associated open finding(s)	New: NA Legacy: Oct 2021_022 (mentioned in PS3)

The Parawi stockpile has been the focus of a lot of consideration over recent years given its location upstream of the source of Fassaliwol River which has high turbidity levels during high flows in the rainy season, particularly impacting the community of Fassaly Foutabhé. A link with the Parawi stockpile has been suspected and subject to investigation by the CBG environment team.

Ahead of the November 2023 site visit, the IESC biodiversity specialist reviewed all recent monitoring reports for the stockpile, none of which identified a clear pathway between it and the river. The sediment ponds that lie between the stockpile and the river valley have been well monitored and measures such as vetiver planting put in place to improve the removal of sediments. However, with no outfall from those ponds towards the river and no evidence of water overtopping the western edge, the inspection reports did not identify actions to address the issue.

The IESC biodiversity specialist visited the area during the site visit and found conditions at the stockpile and sediment ponds to be as described in the monitoring reports. However, a walk of the wider area to the northwest identified a potential pathway for sedimentation that CBG must investigate further. Unlike the ordered storage of soils in the main stockpile to the east, this area contains soils stored in a much looser way. No sediment ponds are present with only a small soil bund separating the area from the northern edge of the valley containing the Fassaliwol river. In addition, there is evidence of the ground slipping down towards the river. In addition, three side channels of the river join it from the north, i.e. from the direction of the more loosely stored soils.

Clear evidence that sediment is entering the river was not recorded by the IESC biodiversity specialist. Nevertheless, this is certainly an area for CBG to consider further in order to continue its efforts to understand the causes(s) of high turbidity in the river.

11.6 Rehabilitation

Rehabilitation continues under the supervision of the rehabilitation specialist who is working with the local nurseries established by CBG to provide sufficient native trees of local provenance for annual rehabilitation targets set out in a Five-Year Rehabilitation Plan.

11.6.1 Rehabilitation of Mined Areas

Performance Standard 6: Rehabilitation of Mined Areas	
Associated open finding(s)	New: NA Legacy: June 2023_044

The 2023 target in the Five-Year Rehabilitation Plan for 2021-2025 was 259 hectares of rehabilitated land. CBG rehabilitated 200 ha of land, a difference of 59 ha (-23%).

Despite falling short of the target for the year, given the level of restoration beyond target completed in previous years, CBG remains on course to exceed the overall target for five years of 1,287 hectares. However, the IESC’s concern would be that the drop below target is somehow indicative of a problem with provision of previously mined land to the CBG biodiversity team for rehabilitation. It will be important to get back on target in 2024 to continue the good progress over recent years.

Following the IESC request for more information on how rehabilitation is considered to have been successful, CBG has confirmed that the key criterion is height, specifically of terminal shoots. Areas are protected from fire for 7 years as after that time, the biodiversity team has found that woody species of that age and associated height can survive the slash and burn agriculture approach. Many such areas have been viewed by the IESC over recent site visits, but the request for a map showing those areas which are considered to have been successfully restored and those where rehabilitation has not been successful remains open and we reiterate that the IESC would like to see that ahead of future visits.

11.6.2 Additional Rehabilitation

The IESC Biodiversity Specialist visited a location near Boullère with the CBG biodiversity team and a member of the CBG Social team to meet with the local community members who have worked with the CBG biodiversity team to rehabilitate an area of gallery forest, that is not part of the Five-Year Rehabilitation Plan. The forest has been degraded by non-mining, third party activities and the tree planting aim to improve the forest to support both biodiversity and the community. Approximately 150 ha of this additional rehabilitation was completed by CBG in 2023. This is notable given the missed target for rehabilitating mined land as, although it cannot be counted as part of the annual mined land restoration target, it does mean that CBG was responsible for more tree planting in 2023 than in any of the preceding six years. The value and benefits of the additional rehabilitation is also different to the rehabilitation of mined land. Rehabilitation of mined land returns a habitat lost to the mine and starts the process of that land being available to biodiversity and communities. The additional rehabilitation aims to increase the value of existing habitats to biodiversity and communities which in turn might hopefully reduce pressure on rehabilitated mined land. The additional rehabilitation should certainly continue, as this may be a contribution to No Net Loss via on-site actions. However this must be undertaken alongside mined land rehabilitation that meets the annual target.

11.7 Integrated Landscape Management Plan (ESAP Item 28)

11.7.1 Final ILMP

Performance Standard 6: Final ILMP	
Associated open finding(s)	New: Nov_2023_BI_001 Legacy: NA

The ILMP has been reviewed and accepted by the IESC biodiversity specialist and lenders and is with CBG for finalisation following those final comments. There were no large, material changes required and so this should be a straightforward process and should happen as soon as possible. Going forward, the IESC will focus its attention on the implementation of the plan.

11.7.2 ILMP Activities

The additional rehabilitation to improve gallery forest described previously is an example of the type of activity which CBG can undertake under the framework of the ILMP to deliver tangible benefits for biodiversity and communities.

Following the visit to the additional rehabilitation area, the IESC biodiversity specialist, the CBG biodiversity team and the representative from the CBG Social team attended a meeting at the village of Balandougou in the very southwest of the South of Cogon concession. CBG and CEMED, (the biodiversity specialist subconsultant working on chimpanzees) have commenced a programme of engagement with local communities to understand their thoughts on chimpanzee presence in the area, including actions that could be taken to help with human-chimpanzee conflict and to engage communities in undertaking activities beneficial to chimpanzees and other fauna. The meeting was extremely well attended with hundreds of villagers present and open to sharing and discussing their experience. A key theme was community members enquiring what support CBG might provide, both in terms of resources but also finances.

11.8 Biodiversity Monitoring and Evaluation Plan (BMEP) Implementation

CBG, in combination with its subconsultants such as TBC and CEMED, is making good progress with BMEP implementation. In particular, the updated habitat mapping has been completed so that an analysis of current habitat cover compared to habitat cover in 2016 can be made.

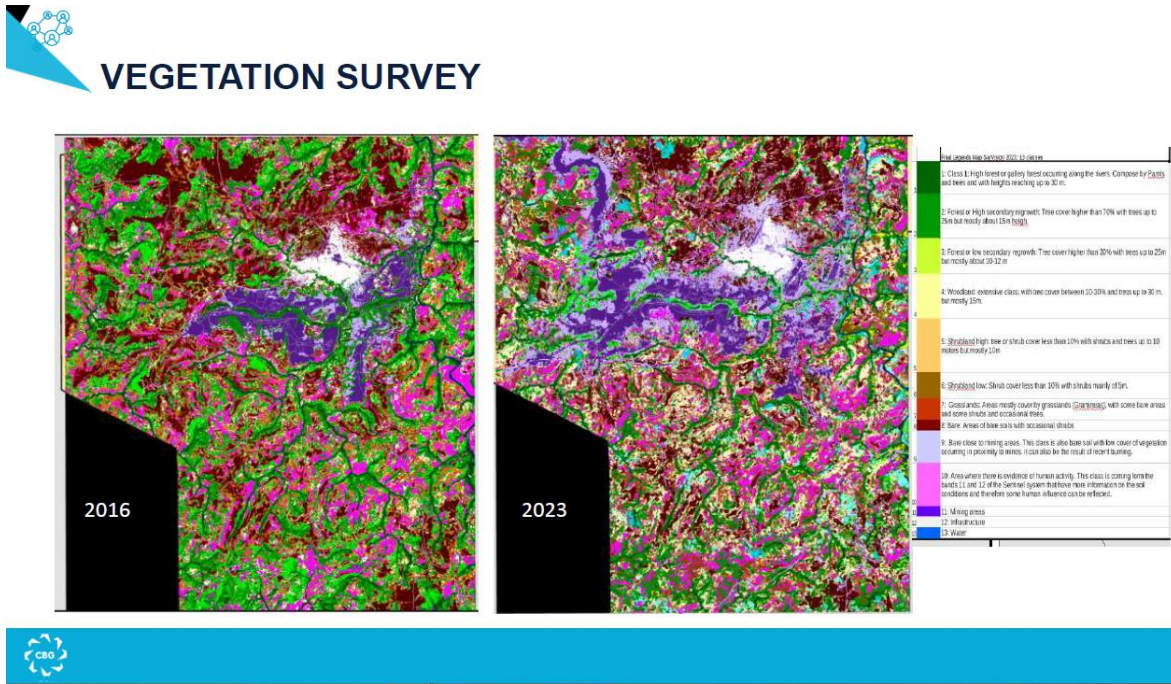


Figure 11-3 : Comparison of habitat cover.

Detailed monitoring of the chimpanzee population within the South of Cogon concession also continues and includes a record of chimpanzee activity within an area of restored forest in the northeast of the concession. This is notable initial evidence that once sufficient time has passed and rehabilitation reaches a sufficient age and state, this key faunal species may reinhabit areas previously mined.

11.9 Site Visit

Performance Standard 6: Site Visit	
Associated open finding(s)	New: Nov 2023_BI-004 Legacy: NA

Figure 11-4 shows the location of points visited during the site visit (indicated by red dots). The information gathered at each location informed the preceding sections with Figure 11-5 providing photographs of the locations and location-specific information.

CBG BAUXITE MINE

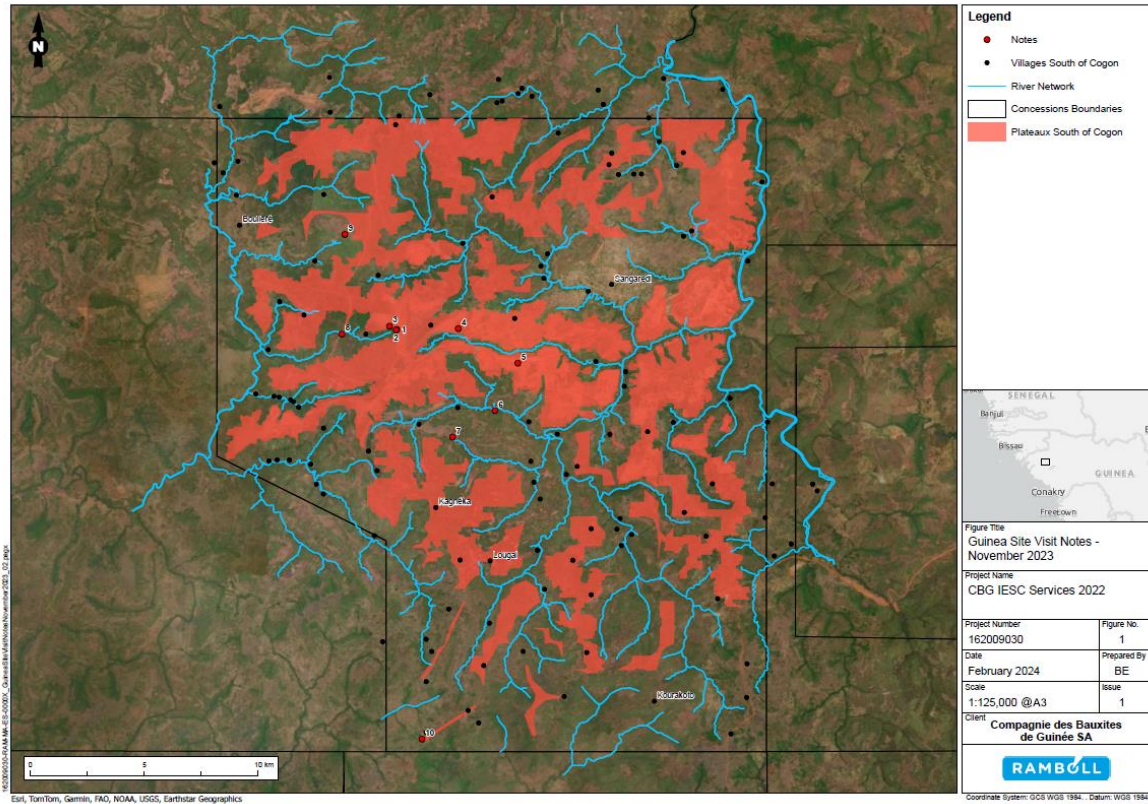








Figure 11-4: Locations Visited within the South Cogan Concession between 28th-30th November

Location	Photograph	Details
1		Parawi Stockpile Sediment Pond sediment pond 6. The drainage system of the stockpile leads to the sediment pond which is formed of two basins connected by pipes within the overall bowl of one large enclosed area. There is no evidence of water escaping the pond in any direction.

Location	Photograph	Details
2		<p>View westwards towards the Fassalywol River headwaters from the side of Sediment pond 6. No evidence of sediment leaving the pond and entering the headwaters from this location.</p>
3		<p>Northern part of the Parawi soil storage area. Soils are not neatly stored here in the way they are elsewhere. There are no sediment containment ponds or ditches between it and the Fassalywol River headwaters to the south (left of picture). The loose earth bund is not sufficient to stop water and sediment may be washing from it into the trees. The ground is also slipping towards the south. This area should be investigated further as a potential source of sediment entering the river.</p>

Location	Photograph	Details
4		<p>Previously visited area at N'Dangara mine plateau. It is due to be rehabilitated once the rain water shown in the photograph has dissipated. The area will be reprofiled to remove steep edges and to ensure better drainage.</p> <p>Unlike other areas, where rehabilitation has replicated natural bowal grassland conditions with just a thin, patchy layer of topsoil, this area will be rehabilitated with a thick layer of topsoil . This will be sufficient for agriculture and grazing and no trees will be planted. This area will be intended as an area for community usage.</p>
5		<p>Northern end of the new Kagnaka haul road, showing the neat construction and avoidance of works straying beyond boundaries into neighbouring habitat.</p>

Location	Photograph	Details
6		<p>One of the Kagnaka haul Road crossings of gallery forest. The location was chosen to avoid higher quality forest and to minimise loss of forest in an area where no chimpanzees were recorded. Green monkeys were seen close to the road on the visit suggesting that they continue to inhabit the forest close to the road. A series of settlement ponds has been created to protect the watercourse crossed by the road. Whilst a good start and not fundamentally flawed, further work is required to improve them. Vetiver sp. is to be planted on slopes. Natural regeneration of vegetation will be allowed towards the road from the retained forest. Some tree planting will be undertaken around new sediment ponds in order to reduce the gap in natural habitats.</p>

Location	Photograph	Details
7		<p>A head water of a watercourse on the eastern side of Kagnaka haul road has been protected from sedimentation by a series of ponds which take road runoff. The head water is very clear, unpolluted and contained lots of fish. The effectiveness of the sediment protection needs to be monitored. A large group of green monkeys was seen crossing the road indicating that the haul road has not created a total barrier to some wildlife. Biodiversity protection along roads is very important, particularly here when haul trucks start to move with high frequency.</p>
8		<p>COBAD Road crossing of Fassalywol River downstream of Parawi soil storage. Pictures previously seen show heavy sediment here in rainy season. Water very shallow, but clear at time of visit both up and downstream.</p>



Location	Photograph	Details
9		<p>Meeting between CBG biodiversity team, CBG social team representative and the local community near Boullère. Location of landscape level plan initiative. The community is paid to plant trees to improve connectivity for chimpanzees and to improve forest for community uses. 50 ha. planted. The community wants its own nursery, it currently uses trees from the nearby Boullère nursery.</p>
10		<p>Meeting with Balandougou village about chimpanzees. The meeting was the result of a CEMED and CBG initiative to engage communities in a stronghold for chimpanzees away from CBG mining plateaux. Community described conflict with chimpanzees such as attacks, food theft and tree damage. The community has killed chimpanzees in the past during confrontations. They asked what CBG will do and would CBG buy land for chimpanzees. The meeting clearly illustrated the issues to address and that CBG cannot impose conservation on a community, no matter how ideal the area is for chimpanzees. Initiatives such as this, supported by both the biodiversity and social teams as part of the ILMP process are ideal for building understanding.</p>

Figure 11-5: Locations Visited during Site Visit between 28th-30th November

11.10 PS6 open findings

11.10.1 PS6 High significance findings

Table 11-1: Summary of open high significance findings, PS6

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov_2023_BI_001	ILMP	The ILMP (ESAP Item 28) is with CBG to finalise and sign off. There are no outstanding issues from the IESC or Lenders. A final version needs to be issued to sign off the ESAP item and it understood that this is to be provided on 1 st March 2024	The final ILMP should be issued as soon as possible and certainly by the date indicated to allow the actions within it to progress An update on progress with commencement of actions should be provided during the next site visit.	High	Open

Certain findings from early IESC monitoring visits are yet to be closed. These 'open' legacy findings are provided in [Appendix 2](#) of this report.

11.10.2 PS6 Moderate significance findings

Table 11-2 Summary of open moderate significance findings, PS6

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
Nov 2023_BI-003	Biodiversity Offset	Progress with the Moyen Bafing Offset. WCF was responsible for the offset program until the end of 2023. Certainty on how the offset will progress is required.	CBG to provide an update to the IESC and lenders on the current situation, by sharing RINA independent audit's results.	Moderate	Open
Nov 2023_BI-004	Sediment monitoring	Head water of watercourse on eastern side of Kagnaka road has been protected from sedimentation by a series of ponds which take road runoff.	The effectiveness of the sediment protection needs to be monitored.	Moderate	Open

Certain findings from early IESC monitoring visits are yet to be closed. These 'open' legacy findings are provided in [Appendix 2](#) of this report.

11.10.3 PS6 Minor significance findings

ID	Aspect	Issue Description	IESC Recommendation	Significance	IESC Opinion on Status in November 2023
June 2023_044	Biodiversity - rehabilitation	CBG reached the notable milestone of over 1,000 ha rehabilitated. The efforts so far under the Five-Year Rehabilitation Plan have been good and remain on target. The plan is intended to reduce the total area of un-rehabilitated, open land within the concession. The success of the rehabilitation areas, in terms of tree survival and growth rates is monitored as part of the Five-Year plan. Now, after reaching the 1,000 ha milestone and at the end of the third year of planting under that plan, is an ideal time to develop a clear overview of the status.	Provide any monitoring data on the status of rehabilitated areas. This can include areas rehabilitated prior to the current five-year plan, areas completed as part of the plan, and areas of additional rehabilitation within buffer areas. The most useful way to deliver this may be visually in the form of maps, potentially colour coding by success criteria, areas damaged or destroyed following community activity etc. but it is for CBG to confirm approach and success criteria. This should be provided ahead of the next site visit in order for the IESC to focus the site visit on key areas.	Minor	Open This was discussed during the November 2023 site visit and clarification provided. However, the requested mapping is yet to be provided. It should also now also include the additional rehabilitation areas described in Section 12.6. The request is extended until the next site visit and the finding remains open.
Nov_2023_BI_002	Biodiversity - resourcing	ILMP lead and other hires	As set out in the staff organogram provided to the IESC, CBG should appoint a dedicated specialist to oversee the ILMP process. At present it is being overseen by a variety of biodiversity team staff, not least the biodiversity team manager. However, the Biodiversity Manager leaves by June 2024 and so the ILMP specialist should be in post before then. The other open posts within the organogram awaiting hires should also be filled.	Minor	Open Dedicated specialist to oversee the process has not yet been appointed.

Certain findings from early IESC monitoring visits are yet to be closed. These 'open' legacy findings are provided in [Appendix 2](#) of this report.

12. PERFORMANCE STANDARD 8: CULTURAL HERITAGE

As noted in the June 2023 monitoring report, all the actions from the Cultural Heritage Management Action Plan are reportedly completed (see figure below).

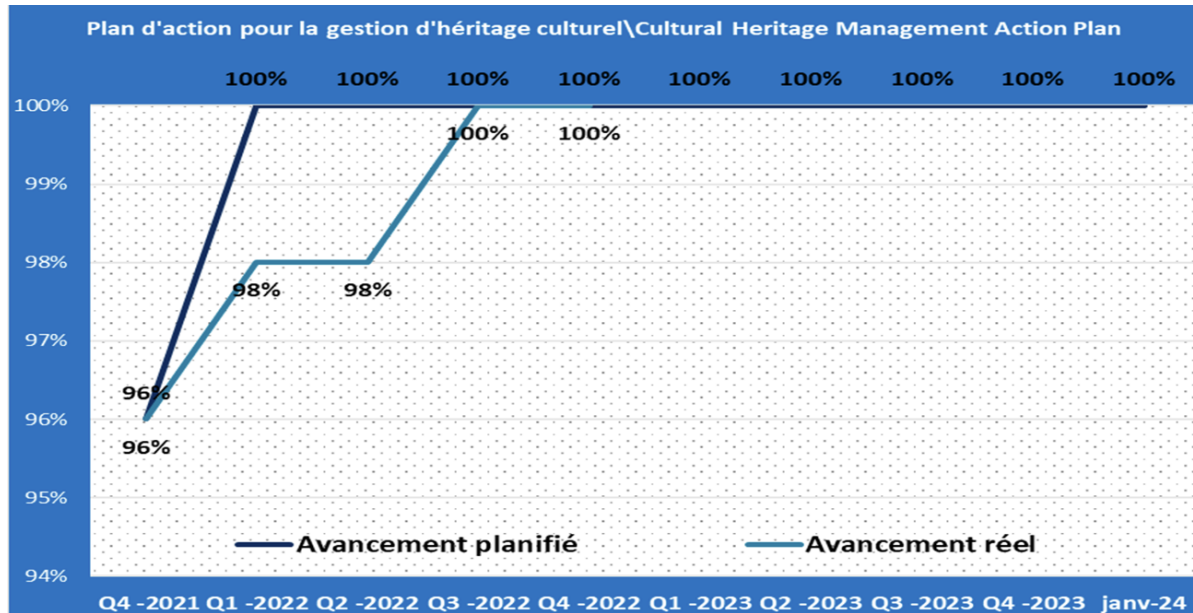


Figure 12-1 Status of the Cultural Heritage Management Action Plan

As was noted in the IESC’s June 2023 report, the considerations from the CHMP (Cultural Heritage Management Plan) are integrated into CBG general induction, and community awareness on this topic is performed during SEP meetings. The cultural heritage register is regularly updated by CBG, and the identification of sacred sites is performed as part of the land disturbance permit process.

15 cultural induction sessions were provided to CBG personnel and subconsultants from January to October 2023. In total, 287 people took part in the cultural heritage induction, including 40 women. In the IESC’s June 2023 report the sessions were noted as 8, where 162 people and 16 women took part, therefore there is an increase in the number of sessions and participation.

CBG confirmed the Cultural Heritage report has been developed in the 1st quarter of 2023.

The community of Paragogo has lodged three requests that CBG has recorded as grievance (1) and request for assistance (2).

The grievance was about a sacrifice that was to have been carried out on the Thiapikouré plateau during the start-up of activities. In response of such grievance, CBG bought a black bull and handed it over to the community for sacrifice. This grievance was reported in the IESC’s June 2023 report, has been recorded in the grievance register and it is now closed.

The following requests for assistance have been managed by CBG:

- The community of Mbouroré requested support from the CBG to make a sacrifice in order to protect women against the evil spirits that make them fall. CBG bought a bull and foodstuffs which were given to the community who carried out the Sacrifice. This grievance took place after the IESC’s June 2023 report.
- The community of Kagnaka requested support from the CBG for carrying out a sacrifice before the start of work on the cemetery fence, according to the recommendation of their grandparent. CBG bought a bull and foodstuffs which were given to the community for the Sacrifice. This grievance was submitted after the IESC’s June 2023 report.

The IESC deems that CBG has appropriately classified and handled both grievance and requests for assistance.

As of October 2023, 47 consultations and awareness-raising meetings on cultural heritage were held:

- 43 at villages;
- 1 meeting held with COBAD to remind COBAD workers about the presence of cultural heritage sites on the mining road;
- 3 follow up meeting on the sacrifice (grievance mentioned above);

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

APPENDIX 1 SITE VISIT ITINERARY

Day	Time	Environment visit	H&S visit	Social (exc resettlement) visit	Resettlement visit	Biodiversity visit	
Monday 27th November 2023	14:00 - 16:00	<i>In Kamsar office:</i> - Introductions (including new CBG HSECQ team members) - Project status update including: Latest on mine plan and recent LDPs (South of Cogon), MUOA progress update, Mine E&S Road Map (compliance status update), planned plant upgrades, map of current mined areas - Revue des findings - HSECQ HR update (recruits, training) - Overview of ASI audit findings					
Monday 27th November 2023	16:00 - 17:00	<i>Kamsar office:</i> <i>General discussion:</i> - Environmental Monitoring Programme (EMoP) and matrix, update on IsoMetrix (and if used for environmental data, disclosure of environmental monitoring results to communities) - demonstration of CBG web site - disclosure of E&S documents - Map of current mined areas	<i>Kamsar office:</i> <i>General discussion:</i> - 2023 H&S performance (key monitoring programs, key metrics) - Presentation on H&S management (identified key/strategic issues) - IsoMetrix (if used for H&S training management or session)	<i>Kamsar office:</i> - ISOMETrix for social topics - Team update from last monitoring report (June)	<i>Kamsar office:</i> <i>General discussion:</i> - Compensation update	<i>Kamsar office:</i> <i>General discussion: Progress update on BAP, BMEP, monitoring, rehabilitation, staffing, North of Cogon</i>	
Tuesday 28th November 2023	Morning	<i>Travel to Sangarédi</i> - Meet with SNAPE and/or "Service Environnement Eau et Forêt de Sangarédi" - 2H	<i>Travel to Sangarédi</i> <i>With Chiara</i> - Visit the CCF (railway control centre room) - Meet with a few CBG train drivers - Visit the CRCC worker camp (Tinguilica ??) - Stop along the way to meet 'Hommes piquets' - Visit the community roads with Chiara (visit active mine site and haul roads to inspect working conditions and safety measures) - Inspection of Sangarédi offices and workshops areas		<i>Kamsar office:</i> Discussions on RPF and LRP under approval <i>Side note: To help the decisionmaking process CBG suggests Ramboll and the policy lenders send their comments to CBG at least 10 days before the site visit (deadline Nov 13th)</i> OR Update findings	<i>In Kamsar office:</i> Meeting - continued discussion on Progress update on BAP, BMEP, monitoring, rehabilitation, staffing, North of Cogon	
Tuesday 28th November 2023	Afternoon	<i>Sangarédi site</i> Visit of the following: - Sedimentation basin where the drowning occurred and discussed actions undertaken following the accident - Drive past the stockpiles/train loading areas - Join a blasting measurement taking session - See the 'evacuation channels' where the 2 fatalities occurred during the rainy season near Fassaly fouthabé				<i>Travel to Sangarédi</i> Visit to Hamdallaye new market garden Visit to some beneficiaries/LRP projects in Fassaly Fouthabé	<i>Travel to Sangarédi</i> - Parawi stockpile and surrounding area to review water siltation issues - Hamdallaye rehabilitation area
Wednesday 29th November 2023	Morning	<i>In Sangarédi:</i> - Meeting with Fassaly Belendère community	<i>Return to Kamsar first light</i> <i>Then at Kamsar (office):</i> Review of specific risk management (relevant rules & procedures): - Work at height - Lifting operation - Asset management (mobile machinery/equipment)	<i>Return to Kamsar first light</i> - Walk along the railway - See the "portillons" and over-bridges along the betafences - Random interview with local community members to talk about the betafences <i>Kamsar</i> - Meet with institutional stakeholders in Kamsar to discuss the betafences and social acceptance	<i>In Sangarédi:</i> Meeting with Gueguere Community Meeting with Kagneka community on the way back to Kamsar	Targeted locations based on CBG response to request to provide mapping showing status (success) of previous restoration (I would like to see areas that aren't doing well and try to understand why.)	

<p>Wednesday 29th November 2023</p>	<p>Afternoon</p>	<p><i>In Kamsar</i> Meeting with local NGOs (not in regular contact with CBG) to discuss environmental and social/landtakes/livelihood restoration aspects (ONG spécialisée sur le genre, cabinet d'étude de perception, NGO on environmental topics)</p>	<p>Kamsar office: Deep dive H&S discussion with H&S team (CBG and contractors' representatives) Review of H&S MS elements : - Management of operational safety risks and Resourcing levels (if not discussed Monday afternoon) - Adequacy of OHS documentation (policies, manuals, SOPs, plans) - Asset maintenance for both controlled and monitored activities (Efficiency of the existing H&S system) - Incident investigation and root cause analysis - Contractor management including H&S contractual obligations placed on contractors - H&S Communication and workforce engagement including with contractors - Training and competency management for CBG employees and contractors (if not if not discussed Monday afternoon) - - Implementation of Alcoa corrective action plan - Commitment of Senior Management/decisionmakers - Improvement/initiatives of safety culture</p>	<p><i>Kamsar</i> <i>Join the environmental visit</i></p>	<p>Areas in 100m buffers and gallery forest where CBG has done additional restoration/enhancement.</p>	
<p>Thursday 30th November 2023</p>	<p>Morning</p>	<p><i>In Kamsar, visit of:</i> - Containers storing hazardous and non-hazardous waste and other maintenance spare parts - Power station (la centrale) - The reservoir built for surface water management - Walk along the "Grand canal" + see other effluents locations (surface water discharge...) - Visit locations where they have implemented corrective AQ actions as part of the fugitive emissions plan - See conveyors C8 and C12 - Meeting : General status of the AQ corrective action plan presented during our visit in July, Check if the status of the ambient air monitoring collect the results if available, (perhaps in their self-monitoring report?), Get the Caterpillar audit report on the generators and see if they have drafted an action plan following this audit (report can be sent)</p>	<p><i>Kamsar:</i> - Hazardous waste area - Areas with work in progress (contractors): for example work at height, lifting operation and work on mobile machinery/equipment - Walkover inspections. Will include inspection of safety measures, discussions with contractors - Also equipment and plant maintenance processes, Risk Management and Control of Work - Construction of MUOA workshop (if underway?) - Documentation on site</p>	<p><i>In Kamsar:</i> Update sur certains plans de gestion (SEP, Grievances, CHSMP, CHMP, autres?)</p>	<p>Meeting with Kagneka community on the way back to Kamsar General discussion: RPF/LRP update, Grievances update, Hamdallaye and Fassaly RAP/LRP update, LRP implementation update (by Phénix).</p>	<p><i>Return to Kamsar first light</i> - Surface water outlet from the 'grand canal' at Kamsar site - Other outlets (some of the 12 surface water exit points to the sea)</p>
<p>Thursday 30th November 2023</p>	<p>13:30 - 15:00</p>	<p><i>Kamsar office:</i> Ramboll team finalization of the close out presentation (without CBG)</p>				
	<p>15:00 - 16:00</p>	<p><i>Kamsar office:</i> Rehearse close out presentation with CBG E&S teams</p>				
	<p>16:00 - 17:30</p>	<p><i>Kamsar auditorium:</i> Close out meeting with large CBG group with IESC findings</p>				

<p>on the 18th December</p>	<p>1/2 day, online</p>	<p><i>Review of current EMPs and updates:</i></p> <ul style="list-style-type: none"> -Noise and vibrations (while blasting), -waste, (soils) -Update on dredging <p><i>Water focus:</i></p> <ul style="list-style-type: none"> - Water Management Plan Implementation status - Surface water in Kamsar: i) "grand canal" rehabilitation plan, ii) agenda for the cleaning of the drains at the plant, iii) drain extension status, iv) actions to lower sediments at the outlets - Drinking water: Status on aluminium concentrations at Cogon and Batafong drinking water stations. - Wastewater: i) Update on Kamsar WWTP (bypass and rain issue), ii) Sangarédi UV treatment system at the WWTP iii) Coliforms concentration in the WW, iv) sludge management procedure - Surface water in Sangarédi: i) feedback expert from Alcoa -groundwater: cumulative impact on groundwater from CBG usage <p><i>Other:</i></p> <ul style="list-style-type: none"> - Findings and actions from the ALCOA delegation visit. Initiatives/progress against action plans -Management of Change (MoC) (progress since previous visit) 				
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APPENDIX 2

ISSUES CLOSED IN THIS MONITORING VISIT

Status of issues raised in the previous site visit reports and closed during this site visit monitoring report are listed below

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
June 2023_001	Organizational capacity and competence - staff resources	The permanent Resettlement Manager post remains to be filled. The Environmental Monitoring Team Leader post is vacant and must be filled. HSECQ Director is still in vacant position. The current Acting HSECQ Director is the head of HSE department.	1	CBG to continue in its efforts to recruit the Resettlement Manager and the Environmental Monitoring Team Leader. CBG should also clarify its position with respect to the HSECQ Director position.	High	Superseded by item Nov 2023_HS_001 (The Environmental Monitoring Team Leader was recruited and joined the CBG team in September 2023)
June 2023_004	Grievance Mechanism	3 grievances relate to accidents of stray animals crossing the railway, with one being still open since March 2023 which CBG has started recording. The IESC understands that, based on Guinean regulation, CBG is currently rejecting these types of grievances. It is therefore however unclear why one of these grievances still remains open since March 2023 (no comments provided in the register to further understand its status). Information currently available in the grievance register does not provide clear information on the progress made on	1	Provision of more details to better clarify closure or progress made is required within the Grievance register.	Minor	Closed

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
		open grievances. Furthermore, details on the reasons underlying the closure of grievances is not provided in many cases.				
June 2023_005	Resettlement team capacity	The Resettlement team is not staffed at the level commensurate with the level of effort required to address systemic issues to the on-going economic displacement of an additional +1000 PAPs (Mbouroré Plateau)	1	<p>Appoint a permanent Resettlement Manager and in the meantime ensure there is no new contract break for the resettlement specialist.</p> <p>Finalise the on-going recruitment of other Resettlement team members.</p>	High	Closed
June 2023_007	OHS system, organization and performance	HSECQ Resources and lack of follow-up to the multiple action plan(s) may result in the reoccurrence of similar serious events	PS2	Start now the procurement process of the contracts ending in December 2023	Moderate	Closed
June 2023_008	Workers Engaged by Third Parties_Contractor Management Plan	CBG is seeking to recruit a new CMP coordinator to manage the final stages of the CMP process	2	<ul style="list-style-type: none"> Complete recruitment of a CMP coordinator Pending this recruitment and to cover these final stages, the committee should assign a CBG manager per contractor as previously announced 	Moderate	Closed
June 2023_009	Workers Engaged by Third Parties_Contractor Management	Interviews with security guards contracted with local subcontractors showed working conditions requiring improvements in terms of labour and working conditions and check for any areas for improvements (such as considerations of working hours reduction under Ramadan period)	2	Contractor Management Plan to be finalized as a matter of priority, with regular supervision of aspects relative to working conditions and human rights included in checklists and audits.	Moderate	Closed

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
June 2023_011	Workers Engaged by Third Parties_Contractor Management	Interviews with security guards contracted with local subcontractors showed working conditions requiring improvements in terms of labour and working conditions and check for any areas for improvements (such as considerations of working hours reduction under Ramadan period)	2	CBG to better convey presence of CBG's workers' grievance management procedures among all contractor' workers and to verify the need to install more grievance boxes in the project area, including the mine areas to facilitate easy submission of grievances, including anonymous submissions.	Moderate	Closed (induction to subcontractors workers reportedly undertaken) Ref. to Nov 2023_SO_004 for a dedicated finding on Grievance management
June 2023_013	Workers Engaged by Third Parties_Contractor Management	OHS performance	PS2	<ul style="list-style-type: none"> • KPIs updates, the list of the H&S action plans and the percentages of completion should be shared with the Senior Management so that they can make better informed decisions with an overall view • Improve analysis of H&S KPIs, add proof of system effectiveness (continuous improvement): <ul style="list-style-type: none"> ○ KPIs should be better managed by using leading indicators and targets ○ KPIs should be improved by segregating them for contractors and CBG employees • On the Annual Monitoring Report 2022: <ul style="list-style-type: none"> ○ Add analysis and classification of incidents ○ Add analysis and classification of actions 	Moderate	Closed

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
				Add a conclusion to the past year and define the objectives for the coming year		
June 2023_014	Air quality monitoring	The IESC previously reported malfunctioning equipment was preventing collection of ambient air quality data from the Kamsar air quality monitoring station. The monitoring equipment has since been repaired (see December 2022 report), however the connection of the NO _x and SO _x equipment isn't working and needs fixing. CBG has purchased new NO _x and SO _x equipments and informed this is expected to be fixed in December 2023.	PS3	Follow up closely on the delivery of the NO _x and SO _x equipment. Ensure prompt installation of the equipment following their reception	Minor	Superseded by item Nov 2023_EN_007
June 2023_013	Monitoring and review	OHS performance	PS2	<ul style="list-style-type: none"> • KPIs updates, the list of the H&S action plans and the percentages of completion should be shared with the Senior Management so that they can make better informed decisions with an overall view • Improve analysis of H&S KPIs, add proof of system effectiveness (continuous improvement): <ul style="list-style-type: none"> ○ KPIs should be better managed by using leading indicators and targets ○ KPIs should be improved by segregating them for contractors and CBG employees • On the Annual Monitoring Report 2022: 	Moderate	Closed

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
				<ul style="list-style-type: none"> ○ Add analysis and classification of incidents ○ Add analysis and classification of actions <p>Add a conclusion to the past year and define the objectives for the coming year</p>		
June 2023_017	Domestic wastewater quality	The domestic wastewater from the Kamsar plant is reused for the dust management on the CBG site. Following the June 2023 site visit, CBG has provided the wastewater quality results. However, although all parameters in the communicated results comply with the thresholds, information on the total coliforms in the Kamsar wastewater were not provided. The same observation is made for the Sangarédi wastewater (although this wastewater is not reused but instead flows to the environment).	3	It is crucial to show the total coliforms in the sampling results. This is especially important in Kamsar domestic wastewater as it is reused	Moderate	Superseded by Nov 2023_EN_009
June 2023_018	Sludge management	The sludge from the wastewater treatment plants (such as from the Sangarédi WWTP) are dried then disposed at the site's rehabilitation areas. However, a procedure for the disposal of the sludge has not been developed yet.	3	A procedure for the disposal of the sludge must be developed before another sludge is disposed. The procedure can be based on the process followed for the disposal of the Sangarédi Wastewater Treatment Plant (WWTP) sludge.	Moderate	Superseded by item Nov 2023_EN_011
June 2023_019	Surface water discharge - Kamsar	The drainage system for the surface water and stormwater at the Kamsar site	3	An engineering solution such as the installation of sediment traps at outlets must be found to	High	Open (CBG should

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
		<p>showed high sediment and oil concentrations in the past.</p> <p>To resolve the issue CBG undertakes a few actions, among which the cleaning of the surface water drains on a regular basis. However, the IESC fears the cleaning activities would potentially resuspend settled sediments, thus not reducing the suspended sediments at the outlets.</p>		effectively reduce the suspended sediments in the effluents.		investigate cause of exceedances and put in corrective actions as a priority).
June 2023_023	Rail and Community Health and Safety	The IESC notes that the order of 12 horns, reported in December 2022 has still not been delivered.	4	CBG is required to supervise / accelerate the purchase process of all the equipment related to railway safety.	Minor	Closed
June 2023_024	Community Health and Safety - Railroad Safety	CBG has started recording stray animal accidents along the railway in the grievance register although requests for compensation are rejected in line with national regulation.	4	In addition, the IESC encourages CBG to continue keeping records of, investigate livestock accidents	Minor	Closed (grievances related to stray animal accidents are recorded)
June 2023_027	Community Health and Safety - Railroad Safety	Stray animal accidents are recorded as grievances and as doléances. The number of accidents involving animals along the railway needs to be consistent and managed as grievance.	4	CBG to keep on recording stray animal accidents along the railway consistently and as grievances.	Minor	Closed (Stray animal accidents are under CBG's radar and solutions are under investigation. The IESC deems this item can be

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
						close though notes that a couple of minutes shared related to the measurement of betafences refer to community requests for assistance)
June 2023_028	Community Health and Safety – Mine site Safety	A fatality occurred on May 18th, 2022, in a sedimentation basin (reportedly N°4) at the Sangarédi mine site. This fatality was not reported to the IESC by CBG during the community health and safety sessions (held during each site visit). Following the site visit, CBG has shared the minutes of the meeting held after the fatality. No other documentation on the fatality was communicated to the IESC. On this occasion Lenders were not notified of the incident.	3	<p>Despite being an isolated failure to report, measures should be put in place to ensure there are no repeated failures to notify Lenders when community incidents occur.</p> <p>Inspection programmes should be put in place to identify damage/vandalism of community safety measures e.g. installed fencing intended to restrict access to dangerous areas.</p>	High	Superseded by item Nov 2023_SO_010
June 2023_030	Resettlement Policy Framework (RPF)	The updated Resettlement Policy Framework (RPF), including updated compensation matrix, has been pending validation for more than two years whilst undergoing an iterative review process with the Policy Lenders.	5	<ul style="list-style-type: none"> Get the approval from CBG Senior Management of the new dispositions with financial and operational impacts <p>Organize a workshop with Policy Lenders to review one by one the comments that are problematic until an agreement is found on the final version</p>	High	Closed (agreed with lenders and disclosed in Feb 2024)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
June 2023_032	Hamdallaye and Fassaly Fouthabé RAP	Some infrastructure requests from Hamdallaye and Fassaly Fouthabé have been registered as grievance (ex: soccer field, additional IGA infrastructure) whereas they were not part of CBG RAP commitments	5	Manage any new request for new infrastructure, except the ones related to RAP commitment not fulfilled or CBG impacts, as Community Investment requests, the same way such requests are handled for the other communities of CBG zone of influence.	Minor	Closed
June 2023_037	Other LRPs	Except the Hamdallaye and Fassaly Fouthabé RAP and MUOA LRP, none of the LRPs have been approved by lenders, though implementation have started for some of them. The documents have done multiple backs and forth between both parts without final agreement.	5	Validate the pending LRPs with the lenders. Both parties need to reach an agreement to close those documents which won't be aligned with the (yet to be validated) updated RPF. The discrepancies with the new RPF will have to be treated as part of the historic land take/legacy issues. These validated LRPs, maybe supplemented with the Phénix Program must be shared with the PAPs.	High	Closed (following agreements during a resettlement workshop in Dec 2023, several LRPs have been finalised)
June 2023_038	Other LRPs	The PAPs are not participating in the monitoring and evaluation of the LRP implementation	5	Create Livelihood restoration committee at village level, in charge of monitoring the implementation of the livelihood restoration plans.	Moderate	Closed
June 2023_039	Other LRPs	Communities raised the lack of fences in market gardens with impact on livelihood restoration status	5	Assess with Phénix the relevance of supporting fencing for market gardening activities.	Moderate	Closed
June 2023_040	Other LRPs	Phénix appears as doing a good job in assisting (administrative support) the small companies contracted to supply goods and services for the program,	5	Include these small enterprises either into an Entrepreneurship Community Development Program or the capacity building component of a future local procurement program (as they are de facto tier 2 CBG suppliers).	Minor	Closed

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
		though time consuming and not part of their current mandate.				
June 2023_043	Resettlement team capacity	There are important elapsed periods between contracts of consultants and service providers critical for the resettlement department (e.g Resettlement specialist, Hamdallaye and Fassaly Fouthabé LRP implementer)	1	Start now the procurement process of the contracts ending in December 2023	High	Closed
June 2023_045	Biodiversity - resourcing	ILMP Staff lead	6	As set out in the staff organogram provided to the IESC, CBG should appoint a dedicated specialist to oversee the ILMP process. At present it is being overseen by a variety of biodiversity team staff, not least the biodiversity team manager. However, the Biodiversity Manager leaves by June 2024 and so the ILMP specialist should be in post before then. The existing team of biodiversity inspection specialists must be retained at its current level of a minimum of three people.	Moderate	Superseded by item Nov_2023_BI_002 Dedicated specialist to oversee the process has not yet been appointed.
Dec 2022_001	Organizational capacity and competence - staff resources	The permanent Resettlement Manager post remains to be filled. The Environmental Monitoring Team Leader is due to leave CBG at the end of Q1, 2023. It is unclear whether he will be replaced by an external hire/there is a succession plan in place.	1	CBG to continue in its efforts to recruit the Resettlement Manager and clarify its position with respect to the Environmental Monitoring Team Leader position.	High	Superseded by item Nov 2023_HS_001 The Environmental Monitoring Team Leader was recruited and joined the CBG team in

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
						September 2023.
Dec 2022_009	Stakeholder Engagement	Engagements at the port are currently on hold due to recent unavailability of pilots specialised in driving boats suitable to reach the areas of intervention.	1	CBG to re-establish engagement activities at the port area as a matter of priority.	Moderate	Closed
Dec 2022_012	Stakeholder Engagement	Consultation follow-ups occur though not systematically. Minutes of meetings for every consultation are not shared with communities and signed off as evidence of recognition and acceptance of the topics discussed	1	Ensure that minutes of the consultations undertaken to be shared with communities and signed off.	Moderate	Closed
Dec 2022_021	Environmental Management Plans	Certain Environmental Management Plans have not been updated since January 2019, in part because updates were being linked to outcomes from the implementation of the roadmap/development of the integrated Management System. This finding has been made before and is repeated to emphasize an increasing urgency to update the EMPs.	PS1	Undertake a structured review of current EMPs and update accordingly, keeping the IESC/Lenders informed in accordance with the MoC procedure.	High	Superseded by Nov 2023_EN_005
Dec 2022_022	2022 dredging campaign	Dredging of port, turning circles and approach channel was completed outside of sensitive periods for marine fauna in accordance with the Dredge Management Plan and a Dredging Permit. However, the IESC is unable to confirm whether certain requirements of the permit/DMP were executed, including characterisation	3	Future dredging campaigns should comply in full with the relevant requirements of the DMP as transposed into Dredging Permits.	Moderate	Superseded by item Oct 2021_012

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
		of sediment quality and benthos prior to dredging.				
Dec 2022_023	Risks and impacts	Numerous findings from waste management (hazardous area and storage workplace)	PS2	<ul style="list-style-type: none"> • The hazardous waste area: <ul style="list-style-type: none"> ○ Add first aid kits (eye wash and emergency shower systems) and fire emergency equipment near the area. ○ Clearly identified with labels all products stored in (and near) the area. • The waste storage workplace: <ul style="list-style-type: none"> ○ Checked if fuel storage tank complies with the manufacturer's recommended location rules. ○ Keep HSE documents in the work areas (e.g. Take5 assessments). <p>Formalise all inspections regardless of whether there are observations/findings.</p>	Moderate	Closed
Dec 2022_024	Asset integrity/falling objects	Corrugated sheeting used as cladding for the transfer towers is loose and/or damaged presenting a risk to workers operating below. Also, accumulations of bauxite dust were observed on several angled panels presenting to a risk to workers below in the event the dust falls as a consolidated mass	PS2	CBG should inspect its assets to identify risks from falling objects. Damaged or loose panels at risk of falling should be repaired with access to areas below any high-risk areas cordoned off in the interim	Moderate	Closed
Dec 2022_026	OHS System	Clarify the HS documentation process to avoid errors or misunderstandings in the workplace	PS2	<ul style="list-style-type: none"> • Clarify the process for archiving HSE documents. • Clarify the procedure for the management of change (and revision of safety documentation) on site. 	Moderate	Closed (the IESC notes good progress has been made)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
				<ul style="list-style-type: none"> • Share and provide with contractors and employees the site safety procedures of CBG. • Include lifting operations as operations requiring a work permit in the Job Safety Analysis template. <p>Add the required documents to the CBG excavation permits.</p>		
Dec 2022_027	Contractor Management Plan	New Contractor Management Plan is ongoing with involvement of HR, legal and procurement departments	PS2	<ul style="list-style-type: none"> • Continue and accelerate the implementation of the CMP. 	Moderate (See action "March 2022_012" in appendix 3)	Closed (CMP is fully completed)
Dec 2022_028	Organizational capacity and competency	OHS organisation	PS2	<ul style="list-style-type: none"> • Simplify tools and tables to complete for HS reporting to provide clear KPIs. • Review KPIs to comply with the action plan and priorities. • Review the reporting and monitoring tools so that they serve as communication tools. 	Moderate	Closed
Dec 2022_030	Monitoring and review	The lack of responsiveness in managing fatality related actions should be a warning to those responsible for the HS system or Senior management.	PS2	In order to manage them more efficiently, fatalities related actions should be presented separately in the reporting tables and in the committee reports with the senior management, so that targets and actions are also presented separately.	High	Closed
Dec 2022_033	Noise	CBG has informed that investigations are underway to identify to source for the apparent noise increase at night. The IESC supports this and recommends CBG's findings are shared with	3	Noise monitoring campaigns at Fassaly Foutabhé have shown noise levels to exceed the night-time Project standards during one of the two campaigns (in October 2022). It is unclear whether the increased noise levels at night resulted from CBG's operations or other noise sources.	Minor	Closed

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Status and comments
		lenders/IESC during subsequent site visits.				
Dec 2022_039	Community Health and Safety - Railroad Safety	Stepped footbridges do not enable access by disabled people who are unable to walk/climb steps.	4	As part of the wider Stakeholder Engagement Plan a more dedicated engagement with people with reduced mobility be organised to check for any specific concerns pertaining to railway crossing and footbridges. Also refer to March 2022_025	Moderate	Closed, superseded by March 2022_025 (2 meetings have been held with local association of PwDs, the IESC expects to see more structured engagement to further verify PwDs's opinion on footbridges, and the need of additional gates – this is also considering the meeting with the community of Filima)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
March 2022_001	CR team: Resources	Most of the engagement activities (and thus grievances) are taking place in Sangarèdi. The distribution of members of the team between Sangarèdi and	1	Consider revisiting current staff distribution between Kamsar and Sangarèdi. Some of the senior positions	Moderate	Closed (Newly appointed CR)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
		Kamsar does not correspond with the actual workload. Engagement activities in Sangarèdi currently require additional resources due to volume of activities being undertaken.		currently located in Kamsar should be placed in Sangarèdi along with the incoming recruitment.		team members are all based in Sangarèdi; additional planned resources, will be based in Sangarèdi)
March 2022_005	Management of Change	Limited progress has been made since the previous October 2021 Monitoring Report in terms of the wider understanding and implementation of the MoC Procedure.	PS1	<p>CBG should continue to finalise the MoC Action Plan and roll out the measures therein as a matter of priority.</p> <p>In addition, the IESC further recommends that:</p> <ul style="list-style-type: none"> The new Operations Director assumes a direct responsibility for expediting the implementation of the MoC Procedure. <p>Systems are put in place to make adherence to management of change mandatory. For example, purchases could be blocked unless evidence is provided that change management was considered as part of any Purchase Order approval.</p>	High	Superseded by item Nov 2023_EN_002 The IESC notes good progress and updated this item with a new one.
March 2022_006	OHS Performance	Management of leading indicators (near misses and safety observations) is insufficient.	PS2	<p>Classification of OHS events - CBG should disaggregate the data on high potential near misses from safety observations to provide an accurate report on actual near misses and to track trends for these events.</p> <p>Leading indicators - CBG should identify and track a suite of leading indicators (e.g. events with high severity potential, completion rate for mandatory training, closure rate for corrective actions, number of near misses) that provide a clear understanding of</p>	Moderate	Closed

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				safety-related issues before they develop into significant incidents.		
March 2022_009	Incident Investigations & Root Cause Analysis	Concreted efforts and resources should be provided for timely close out of pending actions arising out of the 2021 significant incidents.	PS2	<ul style="list-style-type: none"> CBG should define the composition of the team in charge of incident investigations and root cause analysis (HSEC, Worker, Manager, Direction, members of a workshop or similar facility...) and train them. <p>CBG should ensure prompt closure of corrective actions following approval of incident investigation reports. Concrete efforts and resources should be provided for timely close out of pending actions arising from the 2021 significant incidents.</p>	High	Closed
March 2022_017	Sangarédi WWTP	<p>The new UV treatment plant at the Dounsey WWTP has been commissioned, however coliforms are still being detected.</p> <p>The sludge tanks have not been emptied although a contractor has been identified. This is a long overdue action.</p>	3	<p>Performance of the UV treatment plant should be investigated and optimised (as is the current CBG intention).</p> <p>Emptying of the sludge tank should be prioritised and any performance improvement at the WWTP recorded.</p>	Moderate	Superseded by item Nov 2023_EN_009
March 2022_019	N&V impacts	Noise levels taken from various rail and mine locations are generally high, however it is not clear whether the noise is generated by CBG activities or other background sources unrelated to CBG's activities.	3	<p>Further interpretation of N&V monitoring results is required, particularly where there are apparent exceedances of Project Standards to determine whether noise levels are attributable to CBG activities and therefore require mitigation. Measured results should also be compared with background levels and the 3 dB increase above background limit taken into consideration when assessing compliance with applicable standards.</p> <p>Factors influencing noise levels, including both CBG noise and other noise sources should be described</p>	Moderate	Superseded by June 2023_022

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				and used to define any corrective actions where necessary.		
Oct 2021_003	CR team recruitment	The appointment of the Database specialist by the end of Q3 2022 and the expectation that IsoMetrix will be functioning fully by end of Q1 2022 means that there will be a six-month period when IsoMetrix will not be used to its full potential.	1	Consider bringing forward the appointment of Database specialist so that the gap between the Database specialist being employed and a fully functioning IsoMetrix is reduced to the maximum extent possible.	Moderate	Closed (database coordinator appointed, though not involved in the Isometrix customization project)
Oct 2021_006	CR team: training	Several training events have been delayed by potentially up to one year and dates for these events have not been agreed with the provider. There is an opportunity for the CR Manager to consider actions that could be adopted to improve training outcomes while minimizing disruption to workloads.	1	Consider: <ul style="list-style-type: none"> • Planning and organizing staff time so that there is minimum disruption to workloads while fulfilling training commitments. Possible options include careful selection of personnel to be attending specific training events, scheduling events so that one event immediately follows another ('back-to-back' sequencing) and providing incentives for some training to be undertaken outside standard working hours; • Applying the 'train the trainer' model where only one or two staff members attend a training event and then they train their colleagues on the key principles and/or practices in shorter subsequent training events; and In the context of future training needs for the period 2023 – 2024; selecting fewer key training	Moderate	Open/ Ongoing (Still valid - Points have been taken into consideration in the 2023 training plan - yet actual schedule and training are yet to be rolled out and monitored)

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
				topics/events (perhaps a maximum of 10 topics/events)		
Oct 2021_021	Air quality – commissioning of old power generating units	Item 3.1.6 of the AQMP action plan specifies the decommissioning of eight old electrical generators located in the original Kamsar central powerhouse by 2020. The IESC understands the old generators are no longer being used, however, they have not been decommissioned.	3	CBG should explain why the power generators have not been decommissioned to date.	Minor	Closed
Oct 2021_023	Water Quality - Bypass of the Kamsar WWTP	The WMP Action Plan includes specific actions relating to use of an untreated effluent bypass at the Kamsar WWTP outside of emergency situations. Investigations have confirmed direct discharge of untreated sewage water to the estuary only occurs during high rainfall events because of rainwater ingress to the sewage drainage network.	PS3	CBG should expand its survey of the sewage drainage network to identify locations prone to rainwater ingress and repair elements prone to rainwater ingress. A flowmeter should be installed to monitor the frequency of discharge events and volume of untreated water discharged to the estuary. Monitoring should confirm no discharge of untreated sewage water during normal operating conditions.	Minor	Superseded by item Nov 2023_EN_006
Oct 2021_024	N&V impacts	Review of noise and vibration management has identified the following issues: 1) Noise monitoring has been hampered by broken and malfunctioning equipment/software. 2) Monitoring at specific sensitive locations along the railway has not occurred.	4	Confirmation of the efficacy of measures put in place is required as follows: Article I. Expedite receipt of ancillary equipment and initiate use of the new noise meters at the earliest opportunity. Article II. Further monitoring is required at specific sensitive locations along the railway. Noise and vibration measurements should be taken at a setback distance from the railway line that is equivalent to that of the sensitive receptors.	Moderate	Partially Closed (items struck out are considered closed) • Noise meters arrived • New monitoring locations along railway

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
		3) There has been repeated exceedances of airblast overpressure limits in 2020.		Article III. CBG should engage with potential affected residents at these locations to determine the level of disturbance currently caused. CBG should confirm through monitoring data that measures to meet airblast overpressure limits have been successful		Additional overblast data is encouraging)
Oct 2021_033	Hamdallaye and Fassaly Foutabhé grievances/ <i>doléances</i>	At the meeting of 3 August 2021, a wide range of issues, concerns and requests were raised by the community representatives many of which do not appear in the grievance and <i>doléance</i> registers	Operations	Issues/concerns/requests raised by participants should be logged within the <i>grievance/doléance</i> management system so that they can be tracked and closed	Moderate	Closed
Oct 2021_041	BAP Implementation	In the IESC's March VSV, concern was expressed about the delay in implementing BAP actions with a recommendation requiring regular updates to be provided via established communication channels, such as the bi-weekly E&S calls. These updates have not occurred.	6	Regular updates to occur, but less frequently than the bi-weekly calls; instead CBG to provide an update on 'BAP Action Implementation Status' in specified (by the IESC) E&S bi-weekly calls. In the interim, CBG is to prepare a Memo on the current status of BAP Action Implementation (post VSV note: memo received) with the first of the regular bi-weekly call updates to occur no later than 4 weeks after receipt of the Memo by the IESC/Lenders. Note: the action lies with the IESC to include periodic biodiversity updates in bi-weekly call agendas.	Minor	Closed The requested updates have been provided and the progress of BAP action implementation is now much improved. Communication of progress needs to continue to be provided, but on the understanding that this continues, this

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
						finding can be closed.
March 2021_005	NoCo Exploration	Community consultations occur after the E&S Rapid Appraisal stage. The draft Compensation and Resettlement Policy Framework shows that community consultations occur prior to impact mitigation measures being defined.	PS1	One round of community consultations to be implemented as part of the E&S Rapid Appraisal stage, at a time which CBG considers most appropriate in the local context.	Moderate	Closed (minutes of community meetings that took place in September 2022 submitted)
March 2021_010	Female submission of grievances	Grievances appear to be submitted exclusively by males.	1	As part of its efforts to increase female participation in stakeholder engagement, it is recommended that CBG considers ways in which women can be encouraged to submit grievances directly and not only via male relatives or male community members.	Minor	Open (CBG continues to 'test' options to increase female participation)
March 2021_011	Communications Plan for 2021	CBG's Communications Plan for 2021 does not include recent important HR documents in its employee 'explanation' actions.	PS1	The actions presented under 'Internal - Operational Excellence', concerning HR documents, should be amended to show the current new key HR documents and not only older, though still current documents.	Moderate	Closed
March 2021_012	Communications Plan for 2021	CBG's Communications Plan 2021 does not include a 'procedure' for managing external communications as required by PS1 (para. 34).	PS1	CBG to design a procedure for managing external communications and then inserts it into the Plan ready for implementation in 2022.	Minor	Closed
March 2021_036	Hamdallaye livelihood restoration	Crops have been affected by pests. The benefit of the 2-year fallow period on the 56 Ha is questionable if no other measures apart from provision of topsoil are taken to improve fertility.	5	Ensure that CECI mobilizes appropriate agronomy expertise and consider alternative crops with better resilience to pests and mixed crops and consider use of phosphorus and potassium fertilizers, as well as "green fertilizers") to enhance the fallow period.	Moderate	Closed The land has been transferred to the community

ID	Aspect	Issue Description	Standard	IESC Recommendations	Significance	Open/Closed (IESC Opinion in June 2023)
July 2019_004	Security management	The HSECQ briefing given to the IESC and Lenders did not include information about site evacuation in case of a major security issue.	PS2	CBG should strengthen its induction procedure(s) to ensure visitors are aware of the procedure to follow in case of a site evacuation.	Moderate	Closed (site evacuation is included in the safety induction)
July 2019_018	Security provision by contractors	Currently, Sogea Satom (one of the MUA contractors), employs three security providers. The guards are not formally trained. Most guards come from the local communities and are not armed. This lack of training poses a risk to CBG.		CBG to review its supervision with respect to contractors and the hiring and deployment security providers to ensure that contractors' practice is aligned with CBG's own practice with respect to hiring and deployment of private security providers.	Minor	Closed, superseded by item Nov 2023_HS_004

APPENDIX 3

STATUS OF ESAP ITEMS (AS OF FEBRUARY 2024)

The ESAP table was updated to present status as of February as this report was being finalised.

CBG BAUXITE MINE

	Theme	Required Action	Date	Indicator of Completion	Status
1	Operation HSEC-MS	Develop a route map outlining major milestones (based upon actions, timeframes, and interim deliverables), to bring operations up to a level consistent with IFC Performance Standards.	10 Business days after receipt of comments from IESC/Policy Lenders.	Gap Analysis	Closed
		This route map will be informed by a 'stand-alone' gap analysis with respect to current systems and any additional items required for IFC compliance, and, also, recommendations arising from work done to implement the other ESAP actions	31/01/2022 (draft) 31/03/2022 (final)	Route Map	Closed
		Align HSEC MS for existing operations with HSEC MS for the Expansion Project and bring current operations up to a level consistent with the intent of the IFC Performance Standards	31/01/2024	Evidence of HSEC MS aligning with HS	Open (residual actions remain open and subject to a waiver))
2	E&S Reporting	Update and amend the structure of the Annual Monitoring Report template, considering Lender/IESC comments, in a form and substance satisfactory to Lenders	18/12/2020	Updated Annual Monitoring Report Template.	Closed
3	Human Resources	Finalize and then disseminate the updated Human Resources (HR) Manual to both direct employees and contractors.	30/10/2020	HR Manual and Workers' Grievance Mechanism	Closed
		Finalize and then disseminate the updated Workers' Grievance Mechanism to both direct employees and contractors.	30/11/2020	Evidence of dissemination to both direct employees and contractors	Closed
4	Human Resources	Finalize the Code of Ethics and Business Conduct	15/11/2020	Code of Ethics and Business Conduct.	Closed
		Disseminate the Code of Ethics and Business Conduct to both direct employees and contractors	18/12/2020	Evidence of dissemination to both direct employees and contractors.	Closed
5	Stakeholder Engagement	Extend and amend the Action Plan for Stakeholder Engagement 2019-2020 through to 31 December 2021 with contents changed, as appropriate, to ensure alignment with the MUOA-amended Stakeholder Engagement Plan.	29/01/2021	Extended Action Plan 2019-2021	Closed
		Disclose MUOA-amended Stakeholder Engagement Plan and amended Action Plan.	10 Business days following the approval of the amended SEP and Action Plan	Evidence of disclosure of MUOA-amended SEP and Action Plan.	Closed

		Revise and update the Stakeholder Engagement Plan to reflect current/future needs and lessons learnt since 2016. The revised and updated Stakeholder Engagement Plan should focus on the period 2022 to 2025 and on improving alignment to IFC standards (for example, the stakeholder analysis/mapping section). The SEP to include a communication program to report back to communities about the results of water and air monitoring.	One month after receiving comments on the draft	SEP (2022 to 2025)	Closed
		SEP (inclusive of all SEP Action Plans) to be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	10 Business days following the approval of the final SEP and Action Plan (2022 to 2025)	Evidence of SEP disclosure.	Closed (disclosed in February 2024)
6	HSECQ Resources	Employ a dedicated full-time Environment Manager. CV to be provided to Lenders for approval on a 'no objection basis' before confirmation of appointment followed by evidence of hiring.	30/11/2020	Evidence of Hiring.	Closed
7	HSECQ Resources	Prepare and implement a Time-bound Recruitment Plan (initially through to mid-2021 (Version 1) and subsequently up to 31 December 2023 (Version 2)) for the Community Relations and Resettlement sections to increase capacity for social risk management and to strengthen management of the grievance mechanism.	30/11/2020	Version 1 Recruitment Plan	Closed
		The Version 1 Plan will include job specifications/SoW for each position in these sections. The Plan will specify urgent hires, including expertise in the following: grievance mechanism implementation, resettlement, stakeholder engagement, livelihood restoration, and data management. Evidence of recruitment to positions to be provided to Lenders.	29/01/2021	Evidence of urgent hires	Closed
		The Version 1 Plan will present commitments to establish framework contract(s) with consultants for regular support in resettlement/livelihood restoration and data management. Scopes of Work for framework contracts to be submitted to Lenders.	30/03/2021	Scopes of Work for Framework Contract(s)	Closed
		The scope of work submission is to be followed by notification of signed contracts.	30/06/2021	Notification of signed contracts	Closed
		The Recruitment Plan will be updated in mid-2021 (Version 2) to cover the period through to end December 2023.	30/08/2021	Version 2 Recruitment Plan.	Closed
8	HSECQ Resources	Prepare and implement a Time-bound Capacity Development and Resource Acquisition Plan for 2020 to 2021 (Version 1) for the Community Relations and Resettlement sections, including resourcing for social risk management teams, purchase of equipment/resources (such as vehicles, GPS handsets, and data management software) and in situ/external training of staff members in use of acquired resources.	20/11/2020	Capacity Development and Resource Acquisition Plan for 2020-21 (Version 1).	Closed

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

12b	E&S Management Plans	Water Management Plan draft.	31/01/2021	Final Water Management Plan	Closed
12c	E&S Management Plans	Updated Environmental Monitoring Programme	20 Business days after IESC/Policy Lenders sign off on Noise and Vibration Plan (Item 12a)	Updated Environmental Monitoring Programme	Closed
12d	E&S Management Plans	Local Content Plan	31/01/2021	Final Local Content Plan Signed off by IESC	Closed
12e	E&S Management Plans	Cultural Heritage Management Plan	N/A	Cultural Heritage Plan	Closed
12f	E&S Management Plans – Community Development Plan	Draft Community Development Plan. The Plan will include tailored information-sharing approaches and methodologies for disseminating the Plan to targeted communities.	16/06/2020	PDN with draft of amended Plan	Closed
		Review by external third-party consultant of this Community Development Plan. The review will focus on ensuring that CBG's community investment strategy is aligned with IFC best practice. Prepare Scope of Work	18/12/2020	After receiving the Consultant's Scope of Work.	Closed
		SoW for the review to be submitted to the consultant to be approved by Lenders on a 'no objection' basis.	1 Month from bid submission date	Approval on a 'no objection' basis.	Closed
		The Community Development Plan will be revised as necessary, following the review.	31/01/2022	Following the submission of the revised Community Development Plan.	Closed

		The Community Development Plan will be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	10 business days after the IESC/Policy Lenders have approved the revised Community Development Plan	Evidence of disclosure	Closed
12g	E&S Management Plans	Finalised Influx Management Plan.	15/03/2021	Final Influx Management Plan Signed off by IESC	Closed
12h	E&S Management Plans	Finalised Community Health and Safety Management Plan.	28/02/2021	Final Community Health and Safety Management Plan Signed off by IESC	Closed
12i	E&S Management Plans	Finalised Road and Rail Safety Management Plan.	30/04/2021	Final Road and Rail Safety Management Plan Signed off by IESC	Closed
12j	E&S Management Plans	Finalised Emergency Response Plan.	20/05/2021	Final Emergency Response Plan Signed off by IESC.	Closed
13	E&S Management Plans	i) Prepare an interim Air Quality Management Plan (AQMP) in accordance with the Scope of Work (Ref. AIR QUALITY Scope of Work ver 3). The Interim AQMP will be informed by the 2019 emissions data for Dryers 1-3 (and other sources) and dispersion modelling. The Interim AQMP will also propose stack emission limits and measures necessary to meet proposed limits and will include information on the necessary financial budgets to achieve the requirements within. Proposed emission limits will be agreed with Policy Lenders and the IESC.	(Subject of a waiver – in progress)	Interim AQMP	Superseded (the AQMP is subject to a new action plan and timeline agreed with the Lenders and therefore removed from the ESAP)
		Update the interim AQMP to include consideration of Dryer 4 emissions and additional sampling data collected for Dryers 1-3/other sources as applicable and in accordance with the Scope of Work to produce a Final AQMP.	(Subject of a waiver – in progress)	A Final AQMP.	See above

14	Worker Demobilization	<p>Prepare</p> <p>4) Worker Demobilization Plans and</p> <p>5) subsequent Demobilization Close-out Reports, for future demobilization events, focusing on issues such as planning and monitoring procedures used to manage demobilization with emphasis on the process(es) used to notify workers of key demobilization dates, make and record final payments to workers and to manage grievances received and the procedures leading to grievances being closed out.</p> <p>6) Demobilisation requirements should be communicated to contractors via the CBG Contractor Management Plan which should be updated accordingly.</p>	29/01/2021	<p>i) Worker Demobilization Plan</p> <p>ii) Demobilization Close Out Report</p> <p>iii) Communication to Contractors</p>	Closed
15	Pollution Prevention	Repair/upgrade the oil water separator located at the tank farm to achieve compliance with the applicable project standards. Design to be agreed with IESC.	31/12/2022 (Subject of a waiver)	Design Agreed for Pollution Prevention Upgrade/Repair works completed	Closed
16	Community Mobility and Livelihoods	Develop a Scope of Work for an external consultancy and a Request for Proposals issued.	15/11/2020	SoW agreed	Closed
		Commission a study and report to be conducted by a suitably qualified consultant, on the impacts on mobility and road traffic flows (in urban areas) due to increased train movement frequency, including livelihood impacts resulting from alterations to mobility/traffic flows.	24/02/2021	Study commissioned	Closed
		The study report to include recommended measures to mitigate adverse impacts.	30/09/2021	Draft Study	Closed
		Based on the results of the study, CBG shall seek to agree with the Policy Lenders on mitigation measures to be implemented by CBG.	30/10/2021	Signed off by IESC and Policy Lenders	Open
		CBG to seek the approval of the MUOA User's Committee in accordance with Section 22 of the MUOA to address mitigation measures that need to be implemented (as agreed pursuant to (iv) above), including the roles and responsibilities of each of the parties with respect to such implementation.	30/10/2021	Signed off by IESC and Policy Lenders	Open

17	Past Compensation Report	Finalize the Past Compensation Report (2010-2015), with recommendations to improve livelihoods of PAPs, which integrates comments provided by the IESC and Policy Lenders. The recommendations will form the basis of an Action Plan to be implemented. This Plan will be included in the final Report.	31/10/2020	Completion of the Past Compensation Report including the Action Plan.	Closed
		The Past Compensation Report, including the Action Plan, will be disclosed publicly by CBG in a form agreed between the Policy Lenders and CBG.	22/01/2021	Evidence of disclosure.	Closed
18	Compensation and Resettlement Policy Framework (CRPF)	Finalize CRPF considering Lenders/IESC comments.	30/06/2021	Final CRPF Produced.	Closed
		Approved CRPF to be disclosed publicly in a form to be agreed between CBG and the Policy Lenders.	10 business days after the IESC/Policy Lenders have approved CRPF.	Evidence of CRPF disclosure.	Closed
19	Kankalaré RAP+LRP	Finalize Kankalaré Resettlement Action Plan (including a Livelihood Restoration Plan). CBG to send a Notification (accompanied with an updated fieldwork schedule), to Lenders, as soon as COVID-19 restrictions are lifted in a manner that allows the required fieldwork to be implemented.	05/03/2021	RAP and LRP	Closed
20	Kankalaré Infrastructure Measures Completion	Provide interim and final report with photographic evidence of the finalization of infrastructure provision/improvement measures in relation to the Kankalaré PAPs' host communities. The measures are road to Parawi village, Telebofi footbridge over the railway; fencing along railway for the stretch where the railway passes beside Telebofi village; and iron-removal devices for wells.	30/11/2020	Interim Report with photographic evidence.	Closed
			31/12/2021	Final Report confirming all works completed.	Closed
21	Post 2016 Resettlement Independent Review	CBG to support the commissioning and execution of a third-party independent review of all land acquisition processes initiated from 01/01/2016 through to effective date of the CRPF (see item 18) and adequacy of related documentation. A Scope of Work to be prepared and approved by Lenders. This independent review will result in a Report focusing on compliance of land acquisition processes against the requirements of the 2016 RPF and PS 5. The Report will identify non-compliances and include a time-bound	31/01/2021	Budget Approval	Closed
			As per the time bound by the Corrective Action Plan	Completion of actions specified in Corrective Action Plan.	Open

		corrective action plan with budget to cover implementation. CBG to complete implementation of the Corrective Action Plan.			
22	Hamdallaye and Fassaly Foutabhé RAP	Prepare and implement a COVID-19 Plan for H2, 2020, with the key aim of ensuring that CECI resumes/increases activities, in agreement with the communities, as soon as possible while respecting governmental restrictions.	16/11/2020	COVID-19 Plan	Closed
23	Hamdallaye: Resettlement Housing and Infrastructure Repairs Action Plan	Prepare and implement a time-bound Action Plan for housing and infrastructure repairs and other additional works related to the Hamdallaye resettlement site.	30/11/2020	Action Plan	Closed
		Environmental Monitoring Programme to be amended to include sampling and analysis of Hamdallaye water supply. Analysis of data, and any corrective actions needed.	See Item 12c	Updated Environmental Monitoring Programme to include water sampling and analysis	Closed
		PAP satisfaction survey to be undertaken upon completion of repairs and works specified in the Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.	As per the time bound by the Corrective Action Plan	PAP Satisfaction Survey Results	Closed
24	Hamdallaye: Land Rehabilitation Action Plan	<p>Prepare (i) and implement a time-bound Action Plan, with biodiversity inputs, to implement the soil rehabilitation programme as per CBG's report (RAP Hamdallaye & Fassaly Foutabhé: Project Status Report, 12 February 2020) including setting up a pilot field to build the capacity of the population on soil fertility management and finalizing the individual allocation of land (ii to iv) to the respective affected people as per the RAP. The Action Plan, also, to include specific rehabilitation measures for:</p> <ul style="list-style-type: none"> - the replacement crop-growing land (56 ha); - all land to be used for land-based livelihood restoration activities; and - land for household gardens and fruit/shade trees. <p>v) PAP satisfaction survey to be undertaken upon completion of measures specified in the Action Plan and results provided to the IESC within ten (10) days from compiling the survey results analysis.</p>	30/11/2020	A completed time-bound Action Plan.	Closed
			29/01/2021	Initial evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed
			31/12/2021	Interim evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Closed
			30/09/2023	Final evidence of allocation of all restored land (56 ha) to all entitled PAP's.	Open

			Following implementation of the Action Plan	PAP Satisfaction Survey Results	Open
25a	Economic Displacement (SoW, Plateau LRP)	Prepare and submit scopes of work with respect to the Livelihood Restoration Plan (LRP) in the remaining sections of 25a below.	15/11/2020	Scope of Work	Closed
		Provide confirmation that a Livelihood Restoration Plan (LRP) is being or will be prepared for PAPs and submitted prior to people being displaced in N'dangara, Kagnaka and Parawi by proposed mining activities and haul roads. CBG agrees that no additional land take causing displacement in N'dangara, Kagnaka and Parawi will occur until the LRP has been approved by Lenders.	31/08/2020	Receipt of Confirmation	Closed
		Draft LRP to be submitted for Lender/IESC review.	1 month after receiving lender comments.	Draft and Final LRPs posted by the GFA	Closed
25b	Economic displacement (i) Thiapkhore LRP (ii) Contingency Blocks LRP (iii) IA for contingency blocks (iv) closed	i) Prepare and submit an LRP with respect to PAPs already impacted by displacement in Thiapikouré. This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	15/06/2021	Draft and Final LRP.	Closed
		ii) Prepare and submit an LRP for review and approval by the Lenders with respect to PAPs affected by land disturbance through the streamlined process (Bouroré 1a, 1b & Parawi 2a). This LRP will need to include a section assessing the impacts of the delayed implementation of livelihood restoration on the PAPs and the support offered by CBG to PAPs for the transitional period.	Draft 31/08/21 and then 1 month after receiving lender comments.	Draft and Final LRP.	Closed
		iii) As an interim measure, prepare and submit an impact assessment of the economic displacement, for Bouroré 1a, 1b & Parawi 2a, and identification of those PAPs that are most vulnerable and for which transitional support will be provided.	Draft 30/7/21 and then 1 month after receiving lender comments.	Draft and Final Impact Assessment.	Closed
		iv) Formal written commitment by CBG not to disturb land before any LRP is in place.	30/11/2020	Written Commitment	Closed

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

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