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Stakeholder Engagement Plan

SEP

**COMMUNITY & GOVERNMENT RELATIONS DEPARTMENT NEW LIBERTY GOLD MINE |
GRAND CAPE MOUNT COUNTY – LIBERIA**

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1 ACRONYM

BMMC	Bea Mountain Mining Corporation
CDO	Community Development Officer
CDP	Community Development Plan
CGRT	Community and Government Relations Team
CIL	Carbon In Leach
CLO	Community Liaison Officer
CRO	Community Relations Officer
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency of Liberia
EPML	Environmental Protection and Management Law
ESIA	Environmental Stakeholders Impact Assessment
GO L	Government of Liberia
ICMM	International Council on Mining and Metals
IDP	Internally Displaced People
IFC	International Finance Corporation
LEITI	Liberia Extractive Industries Transparency Initiative
LRRRC	Liberia Refugees, Repatriation and Resettlement Commission
MDA	Mineral Development Agreement
MNG	MNG company, named after the owner Mehmet Nazif Gunal
MOH	Ministry of Health
MOU	Memorandum of Understanding
NGO	Non-Government Organization
NLGM	New Liberty Gold Mine
PAP	Project Affected People
PRO	Public Relation Officer
PS	Performance Standards
RAP	Resettlement Action Plan
RC	Resettlement Committee
SE	Stakeholders Engagement
SEP	Stakeholder Engagement Plan
ShEDS	Stakeholder Engagement Database System
SHEQ	Safety, Health, & Environment Quality
TSF	Tailing Storage Facility
UN	United Nations

2 INTRODUCTION

BMMC has identified the need to revise, for continuous effective implementation, its original Stakeholder Engagement Plan (SEP) of 2014, considering the non-static nature of the Project and based on its commitment to upholding the integrity of its social license. This revision is predicated upon the fact that the Owners and Managers of the Project remain fully committed to upholding all local, international standards and good practices as prescribed in the IFC sets of Performance Standards (PS) in general, and PS1 more specifically, the Equator Principles, the UN Principles, the African Union Convention on Protection of Displaced People, and the International Council on Mining and Metals (ICMM). Additionally, there are Regulatory requirements - The Environmental Protection and Management Law, 2002, enforced by the Environmental Protection Agency of Liberia (EPA), with various sections that highlight the need for public consultation during the life of the Project. Lenders and public shareholders undoubtedly expect no less of the Project.

2.1 Purpose

The purpose of the SEP update is to:

- Define the scope of the Management Plan and set out applicable management interfaces;
- Define roles and responsibilities;
- Outline the applicable Project Standards relevant to this Management Plan;
- Define Project commitments, operational procedures, and guidance relevant to this Management Plan;
- Define monitoring and reporting procedures, including Key Performance Indicators;
- Define training requirements and logistics to support management of plan;

The SEP is one of a series of environmental and social management plans developed by NLGM and that set out the procedures and principles that the Community and Government Relations Team (CGRT) will use to manage engagement with stakeholders related to the construction, operation and closure of the New Liberty Gold Mine and other related projects.

The SEP sets out a robust and culturally appropriate approach to stakeholder consultation, disclosure, and the management of any grievances by the CGRT.

The scope set out in this Management Plan apply to all NLGM operations and future expansion projects, including contractors, throughout the life of BMMC's Class A License.

2.2 Application

The requirements set out in this Management Plan apply to all NLGM operations and future expansion projects, including contractors.

2.3 Commencement

This Stakeholder Engagement Plan applies throughout the life of BMMC's Class A License.

2.4 Authority and Management

Any requests for changes to this Management Plan must be addressed to the NLGM Management.

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2.5 NLGM Sustainability Standards

The goal of this SEP is to improve and facilitate decision-making that involves Project-affected people (PAP) and other stakeholders in a timely manner, and to ensure that these groups are provided sufficient opportunity to voice their opinions about the Project. The NLGM sustainability standards commits the project to undertake the following:

- To listen to and engage with host communities in a collaborative, transparent manner to build mutual trust and understanding.
- To work proactively with communities to identify and manage social risks, impacts and obligations.
- To help foster a stable, healthy, and safe environment in which to live and work.
- To develop partnerships with host communities, governments, employees, contractors and others to promote sustainable social and economic development.
- To respect the fundamental human rights of all stakeholders with whom we interact.
- To manage grievances in a fair, timely and consistent manner.
- To consider the special aspirations, needs and concerns of project affected people, women, children and vulnerable groups within its sphere of influence.
- To leave a lasting positive legacy by working with local stakeholders to prepare for our eventual departure and the closure of our operations.
- To monitor and continually seek to improve our community relations performance in order to create value for our stakeholders and shareholders alike.

The SEP is a document that will be used by CGRT to guide its stakeholder engagement activities. In addition, the SEP provides a clear framework to assist stakeholders in understanding how to engage with the CGRT.

2.6 Stakeholder Engagement Process and Objectives

This Stakeholder Engagement Plan covers all NLGM operations including contractor activities. Stakeholder engagement is not linear process; rather, it is a continuous cycle, as illustrated below. This is in line with other management plans that comprise plan-do-check-act systems.



Figure 1: Stakeholder engagement cyclical process

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The specific objectives of this Management Plan are:

- Stakeholder Identification and Analysis
 - Define the Project area;
 - Identify Stakeholders, and how they may be affected by or interested in the Project;
 - Undertake stakeholder analysis to understand Project stakeholders, so that proper methods and tools can be developed to engage them.
- Influence and Importance mapping.

Identify and reclassify all Stakeholder based on concerns, interest and influence/impact on the Project;

- Ensure that vulnerable and disadvantaged groups (including women), are also identified and mapped accordingly.
- Engagement Planning
 - Create a suitable and effective strategy for setting up and remaining engaged with each stakeholder group;
 - Prepare an action plan for consultation that allows for meaningful stakeholder input into the Project;
 - Ensure information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend.
- Develop Information management systems to help to manage the plan
- Create a functional database and recordation system;
- Establish clear mechanisms for managing stakeholders' questions, concerns, and grievances and provide proper conflict resolution processes;
- Document formal consultation and disclosure activities, define stakeholder tracking and records management system.
- Continue the engagement and review the plan as needed
- Provide an implementation plan that includes monitoring and evaluation;
- Build long-term relationships between NLGM and the local communities;
- Ensure stakeholders have access to information on Project activities on time;
- Manage expectations among communities and other stakeholders.

2.7 Overlaps with Other Management Plans

The SEP describes the Project's strategy and programme for identifying and engaging with stakeholders throughout the project life. As such the SEP underpins the environmental and social management system (ESMS).

SEP as part of the ESMS for the NLGM Project overlaps and has cross-linkages to many other Management Plans which have community and stakeholder engagement implications and/or requirements, including:

- Solid and Liquid Waste Management Plan
- Hazardous Materials Management Plan
- Erosion Control and Re-Vegetation Management Plan
- Footprint Management Plan
- Biodiversity Management Plan

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- Non-compliance / Corrective Action Procedure
- Pollution Prevention Plan
- Cyanide and Arsenic Water Management Plan
- Environmental Compliance Monitoring Plan
- Emergency Response Management Plan
- Transportation Management Plan
- Security Management Plan
- Labour Management Plan
- Contractor Management Plan
- Resettlement Action Plan
- Community Development Plan
- Integrated Water Management Plan

Note that some of the documents listed above may not be public.

2.8 SEP Structure

The SEP is structured as follows:

- Section 1 provides for the acronym used.
- Section 2 provides the introduction, objectives and a summary of the engagement processes;
- Section 3 describes the Project and its context;
- Section 4 presents the regulatory requirements for stakeholder engagement;
- Section 5 identifies and analyses the stakeholders relevant to the Project;
- Section 6 summarises previous engagements including lessons learnt;
- Section 7 presents approaches to relocation, resettlement, building design, and compensation;
- Section 8 describes proposed expansion projects;
- Section 9 proposes a way forward for future engagements;
- Section 10 presents the grievance mechanism;
- Section 11 outlines how the SEP will be managed going forward as part of the Project's ESMS; and
- Section 12 conclusion
- Section 13 presents a list of useful references.

3 PROJECT BACKGROUND

The New Liberty Gold Mine Project, located in Western Liberia, is owned and operated by the Bea Mountain Mining Corporation (BMMC). In 2016, the MNG Gold Corp acquired Aureus Mining Company, including its wholly owned subsidiary, Bea Mountain Mining Corp.

BMMC holds a Class A mining license to mine the New Liberty Gold Mine (NLGM) deposit within Liberia. In this regard, BMMC has identified the need to develop and implement a Stakeholder Engagement Plan (SEP) and Grievance Mechanism to comply with the requirements of the International Finance Corporation (IFC), and specifically that of Performance Standard 1 (PS1), and to provide structure and guidance for on-going engagement with stakeholders.

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The NLGM has been involved in an open pit gold mine (the first commercial gold mine in Liberia). The mine has operated for approximately five (5) years, with an ore production and treatment rate of approximately 4,000 tonnes per day. The mining method has been conventional open pit mining using excavators in backhoe configuration to load hauls trucks. All material requires drilling and blasting.

The construction of the NLGM Project has led to both physical displacement of local communities and impacts on the socio-economic environment in the broader project area, as well as at the district and national level. The permanent physical and economic displacement of Old Kinjor and Larjor communities took place as they were within 500 meters of the footprint of the mine and related infrastructure.

The positive impacts mainly relate to the economic advantages associated with the Project. This is achieved through the payment of taxes and royalties, increased employment opportunities, training, purchase of goods manufactured and/or supplied in Liberia, cash compensation for farms, commercial opportunities, community development and an improvement in local infrastructure at the new resettlement site. The development of the Project has brought much needed investment and development opportunities.

Development of the NLGM required the resettlement of 325 property owners and their households in New Kinjor. Several assets were replaced and/or compensated including privately owned dwellings and business structures, community infrastructure, economic trees and field crops, as well as graves and sacred sites.

Based on experience with working with the RAP, the main stakeholder concerns can be summarized as follows:

- Tensions in the relationship between NLGM and its stakeholders. This relates to complaints about lack of employment, lack of sufficient communication and information provision, including lack of support for local development and empowerment. These issues are being addressed through the overall stakeholder engagement and a potential community visioning to help PAPs define their own future and take charge of their lives.
- Changes in local life style as a result of change in economic activity from artisanal mining to remittance-based livelihood, to mine employment, and resettlement to a more urbanized environment and community development program for all is assured in the application of this SEP.
- Equally, the loss of artisanal mining will be addressed when the PAPs are empowered to defining and working to live a new economic future.

3.1 Project Description and Context

The NLGM is in the north-western part of Liberia within the Gola Konneh District of Grand Cape Mount County. The Project is located approximately 80 km northwest of the capital, Monrovia, and between 6° 59' 58.53" N and 11° 8' 17.00" W. Sinje and Daniels Town are relatively large towns located to the south of the project area. The NLGM area is about 8 km² in extent. It is situated within the south-western part of the greater BMMC MDA area.

The Project is a conventional open pit mining operation. A gold processing plant is constructed as part of the Project.

The gold ore is treated through a conventional Carbon in Leach (CIL) process plant to produce gold bullion which is transported off site for refining. The waste rock has been deposited onto

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waste dumps surrounding the mine pits. The tailings are pumped to a Tailings Storage Facility (TSF). Gold is processed using cyanide, and all transport, storage and handling of this reagent are undertaken by the International Cyanide Management Code, to which NLGM is a signatory.

There has been a diversion of the Marvoh Creek, which involved a series of interconnected excavated channels and above ground constructed dams. Water for the processing plant is sourced from the Marvoh Creek and holding dam. About 60% of the process water used in the processing plant is recycled from the TSF. Power for the mine and processing infrastructure is supplied by diesel or heavy fuel oil generators.

Environment and Social Impact Assessment (ESIA) studies have been conducted and associated Management Programs have been developed for the project.

The Project is expected to have a mine-life of approximately eight years, after which a closure, decommissioning and after-care programme will be implemented to ensure the safety and stability of the mining area and to return as much land as possible to its former land-use.

3.2 Project Area and Social Setting

The social project Area is defined as the neighbourhoods and land between them, surrounding the Project Area. Some of the villages located near the Project include Kinjor, Silent Hill, Vai Town, Jikando and Jawajei. These villages fall under the jurisdiction of the Darblo Clan, while the respective town chiefs report to the General Town Chief, who lives in Jenne Brown. Kinjor and Larjor communities were moved as they were located within 500m of the mine pit footprint. They were relocated to the New Kinjor Township in 2014.

The social setting of the Project in terms of local settlements, population, distance to mine operations, deed holders of leased property for the mining and resettlement, and likely impacts and risks, is set out in the table below based on proximity and the ownership of the land the mine is on.

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Bea Mountain Mining Corporation
New Liberty Gold Mine
Stakeholder Engagement Plan

Table 3 Summary of Project Social Setting

Settlement	Type	Population	Distance to Mine	Likely Impacts & Risks
Kinjor	Directly affected community	7000+	1.4km	<ul style="list-style-type: none"> Local recruitment Population influx Increased traffic density Loss of artisanal mining activities Local procurement opportunities
Jaiwehje	Directly affected	400	4km	<ul style="list-style-type: none"> Local recruitment Local procurement opportunities Loss of artisanal mining activities
Jikandoh	Directly affected	125	3KM	<ul style="list-style-type: none"> Local recruitment Loss of artisanal mining activities Local procurement opportunities
Deiyelee	Directly affected	250	9km	<ul style="list-style-type: none"> Local recruitment Local procurement opportunities Loss of artisanal mining activities
Blain	Directly affected	300	8KM	<ul style="list-style-type: none"> Local recruitment Loss of artisanal mining activities Sense of place Local procurement opportunities
Jenne-Brown	Directly affected	1200	16KM	<ul style="list-style-type: none"> Loss of artisanal mining activities Local recruitment Local procurement opportunities Sense of place
Silent Hill	Directly	100	3KM	<ul style="list-style-type: none"> Loss of artisanal mining activities Local recruitment Increased traffic density
Vai Town	Directly affected	100	4KM	<ul style="list-style-type: none"> Local recruitment Increased traffic density Air/noise/dust Partial loss of water source Increased traffic density
korma	Directly affected	75	5KM	<ul style="list-style-type: none"> Local recruitment Air/noise/dust Potential influence on local water source
Malina	Directly affected	75	5KM	<ul style="list-style-type: none"> Local recruitment Air/noise/dust Potential influence on local water source

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3.3 Physical and Economic Displacement

The establishment of the NLGM has led to both physical and economic displacement of local communities. The permanent physical and economic displacement started with the relocation of two villages, Old Kinjor and Larjor, which took place in 2013. The area they once occupied is now in the footprint of the NLGM and related infrastructure. The Marvoh Creek has been diverted without having any negative impact on the surrounding communities.

The resettlement of Kinjor was preceded by a village meeting and a census survey. The Purpose of the meetings was to ensure that key information and decisions are disseminated to all community members and they were involved in all stages of the resettlement planning and implementation process. This included representing community preferences to the Project and other stakeholders and transmitting new Project-related information to the residents of Kinjor and Larjor communities.

The original household census survey undertaken by Golder in 2011 recorded all households in both Kinjor (152 households) and Larjor (7 households). The average household size was about six persons per household (1,024 people).

Moreover, the RAP assessment established that between the Golder survey and the RAP asset survey, a large number of newcomers have arrived in Kinjor. Findings of the household census update undertaken for the RAP in October 2012 determined that 2,066 people will have to be resettled. Surveys undertaken following the changed mine plan identified an additional 11 persons that were directly affected. Thus, the number of people that were resettled in May 2013 was 2,077 people.

As of the last census of September 2015, that number has risen to 4, 479 and possibly doubled by now.

4 LEGAL, POLICY AND INDUSTRIAL FRAMEWORK

4.1 Liberian Requirements

The Environmental Protection and Management Law, 2002, (EPML) is the prominent legislation in Liberia governing Stakeholder Engagement (SE) pertaining to feasibility studies and is utilised by the EPA.

4.2 International Good Practices

4.2.1 IFC Performance Standards

In the development of the SE plan, guidance was taken from the International Finance Corporation (IFC) including the SE Good Practice Handbook to adopt international good practices for both the process of developing the plan as well as its structure and format. Equator Principles

Equator Principles directly relating to stakeholder engagement in a resettlement context are also considered.

4.2.2 UN Guiding Principles

The UN Guiding Principles on Business and Human Rights (UN Guiding Principles) are increasingly being referred to as a benchmark for multinational corporate good practice. The

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UN Guiding Principles include specific reference to corporations establishing 'operational-level' grievance mechanisms

4.2.3 The African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala Convention)

The Kampala Convention is the first continental legislation that relates to the protection and Assistance of IDPs in Africa. Liberia is a signatory to the Convention. The Convention outlines the responsibilities of state parties to the protection of internally displaced people.

4.2.4 International Standards and Codes

NLGM will also comply with the most stringent of national standards and applicable lender standards, with the most stringent standards representing the Project Standards.

These may include alignment with the following activities:

- The International Council on Mining and Metals (ICMM) 10 Core Principles on sustainable Development Framework.
- International Cyanide Management Code for the Manufacture, Transport, and Use of Cyanide in the Production of Gold" (the Cyanide Code)
- ISO 14001 Environmental Management System and the ISO 9000 Health and Safety Management System.

5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 Stakeholder Identification

Understanding stakeholders who will be impacted by, or who have the ability to influence the NLGM, is vital for the engagement process. NLGM consider stakeholder engagement to be an essential part of good business practice and corporate responsibility, as well as providing a positive mechanism by which to improve the quality of the Project.

For the NLGM project stakeholders have been and will continue to be identified on a continuing basis by:

- Identifying the various categories of parties who may be affected by or interested in the project; and
- Identifying specific individuals or Organizations within each of these categories taking into account:
 - The expected area of influence of the Project, that is the geographical area over which it may cause impacts (both positive and negative) over its lifetime, and therefore the localities within which people and businesses could be affected;
 - The nature of the impacts that could arise and therefore the types of government bodies, non-governmental Organizations, academic and research institutions and other bodies who may have an interest in these issues.

The process of identifying the individual and Organizations within each group is a continuing one. To date a large number of potentially affected and interested parties have been identified from:

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- Contacts that the project has already made with communities, government departments and other Organizations as part of its public consultation, disclosure and government interaction to date;
- Undertaking of the RAP and CDP consultations; and
- Consideration of the area of influence of the project insofar as it is currently defined in the ESIA.

These stakeholders are driven by specific interests, e.g. compensation, resettlement expectations, employment expectations, regulatory compliance, environmental protection, social development etc. As the project develops through the lifecycle interests of stakeholders will also shift, which could potentially cause stakeholders to move from support for, to opposition against the project. For this reason, it is imperative to continue stakeholder identification and analysis throughout the mine's life.

Stakeholder engagement is recognised as an essential component of the appraisal, management and monitoring of environmental and social issues associated with NLGM's programme.

Many of the stakeholders identified will be directly involved or affected by economic and / or physical resettlement. They have been categorised into different groups that have a similar interest in the RAP, depending on whether or not they are directly affected by the Project. The stakeholders have also been analysed to determine their importance to the outcome of the RAP and their influence over the RAP.

Influence refers to the power the stakeholders have over a project, in controlling decision-making processes directly, facilitating or hindering a project's implementation.

Importance relates to the degree in which the project depends on the involvement of a given stakeholder group. Stakeholders who are important are generally those whose interests converge with the objectives of the project or whose involvement affects the project outcome. Some stakeholders may be important but may have little influence over a project.

The results of the analysis of stakeholders identified to date are summarised in the table below.

Primary stakeholders for purposes of this SEP are defined as (a) persons, households, groups and communities who are directly affected by the NLGM, and (b) government and tribal authorities who have a direct interest in, and/or responsibility towards the Project.

Secondary stakeholders are defined as (a) business groups and funding organisations who could participate in the CDP and (b) non-governmental and community-based organisations who might have an interest in the Project for business, professional or personal reasons. They all include groups that:

- Have an interest in the project and its operations;
- Are affected by the Project;
- Have the ability to influence or affect the project and its operations.
- Stakeholders could be individuals and Organizations that may be directly or indirectly affected by the Project either in a positive or negative way, and who may wish to express their views.

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In the context of public participation, a stakeholder can be defined as any person, or group, who has an interest in the project or could be potentially affected by its delivery or outputs. Each of these persons or groups require a specific level of participation throughout the project lifecycle. Stakeholders have been identified based on proximity to Project features, potential degree of impact and interest in and concerns about the project (including in relation to government authorities and other public and private-sector organisations).

5.2 Stakeholder Groups

Stakeholder groups applicable to the project are listed and described below. For the Liberian Government as follow:

5.3 Government of Liberia (GoL)

GoL is defined as those agencies of the Liberian Government who have the power to regulate or influence the Project in terms of establishing policy, granting permits or other approvals for the Project, and monitoring and enforcing compliance with Liberian Law throughout the mine lifecycle. It is essential to engage and establish a continuing dialogue with these national authorities at an early stage.

5.3.1 The Ministry of Lands, Mines and Energy (MLME)

The Ministry of Lands, Mines and Energy is tasked to protect the sustainable management and utilisation of the country's lands, mineral and energy resources. The Ministry is mandated to ensure that all issues pertaining to the environmental and social aspects related to mining operations are satisfied when a mining permit is issued. They are also responsible to demarcate political boundaries and work closely with the Land Commission in this regard. It is important to note that a license from the EPA would first need to be obtained before the MLME will provide subsequent authorisations. It has been noted through interviews that the MLME can play a more active role in disseminating information to the public and monitoring on-going mining activities.

5.3.2 Ministry of Internal Affairs

This Ministry oversees local governance, including interaction with traditional authorities over land matters. The Ministry oversees and coordinates the activities of county superintendents, who are assisted by district commissioners. The latter are assisted by paramount, clan and general town chiefs. The Ministry of Internal Affairs (MIA) is knowledgeable on cultural and traditional aspects, specifically relating to communities. The Land Commission falls under the MIA, and it is understood that this Commission is in the process of establishing the needed structures for effective operations. The Land Commission works closely with the MLME and is responsible for the settlement of land disputes once demarcation is done.

5.3.3 Ministry of Agriculture

This Ministry oversees the agricultural lands sector and has established regulations whereby equitable and just compensation is paid for the destruction of economic trees as a result of government projects.

5.3.4 Ministry of Finance and Development Planning

This is the department of the Government of Liberia responsible for coordinating overall financial resource allocation and development planning for the country.

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5.3.5 Ministry of Public Works

This Ministry is responsible for land-use zoning and enforcement of government construction and building standards. It has the responsibility to approve the design and construction of all civil works. In addition, it undertakes urban and town planning and provides architectural and engineering supervision for the construction of civil structures and waste management. The Ministry of Public Works (MPW) works closely with the MLME and MIA on zoning for cities. In some cases, the MPW will liaise with the EPA to determine environmental impacts or provide comments on the latter.

The various procedures and standards prescribed by the Zoning Inspectorate, Infrastructure Implementation Unit and Rural Housing Division of the Ministry of Public Works respectively are being adhered to in the implementation of the NLGM SEP.

5.3.6 Ministry of Health and Social Welfare

This Ministry has a Department of Environmental and Occupational Health which manages matters relating to water and sanitation as well as general environmental issues. Its mandate requires that sanitary and working environments are conducive for all in the workplace, and that the health and safety of workers and nearby residents are ensured. Health workers of the Ministry currently staff the Kinjor Clinic, constructed by BMMC as one of the obligations of the RAP. This ministry was also involved with the relocation of graves and or remains during the relocation stages of the resettlement.

5.3.7 Commerce and Industry

A range of different types of commercial Organizations may be interested in the project including:

- Local entrepreneurs in the immediate project area (including companies and individual farmers, traders, merchants, etc.); and
- Entrepreneurs and businesses from elsewhere in Liberia who may gain benefits by providing goods and services to the NLGM and participating in social investments by the Project.

These Organizations will be contacted through their local communities and via associations representing business and industry.

Notes: Key individual businesses might be directly affected by the mine and business Organizations/agencies should be identified having direct interest in the Project and participating in the tendering procedure. Quality gold production will influence negative environmental impact reduction.

5.3.8 Environmental Protection Agency of Liberia

The EPA is responsible for the monitoring, coordination and supervision of the sustainable management of Liberia's environment. It is mandated to oversee the implementation of environmental impact assessment for projects and activities that are likely to have significant adverse environmental and social effects.

The EPA is further mandated to promote the preservation of important historic, cultural and spiritual values of natural resources heritage and, in consultation with traditional authorities, enhance indigenous methods for effective natural resource management. The EPA works closely with the Forest Development Authority (FDA) on aspects relating to Fauna and Flora.

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5.3.9 Forest Development Authority of Liberia

The Forrester Development Authority (FDA) has been empowered by the Liberian Government to address aspects relating to forest management / protection, biodiversity issues and manage protected areas, all in conjunction with the EPA. The FDA becomes involved when forest areas need to be cleared and intervenes when commercial arrangements need to be formalised when local logging operations are impacted. This authority is also responsible to provide a license for any clearing of fields.

5.3.10 Liberia Refugee, Repatriation and Resettlement Commission

The Liberia Refugee, Repatriation and Resettlement Commission (LRRRC), was established as part of Liberia's post war reconstruction programmes. As the name indicates, the LRRRC is primarily concerned with the plight of war refugees. However, the Commission has also on occasion taken on an oversight role for resettlement related to infrastructure projects. During discussions with the LRRRC, it was advised that the NLGM consult the Commission on matters related to resettlement.

5.3.11 County / District Authorities

Key role-players at the county and district levels are the offices of the County Superintendent (County Planning), and the District Commissioner respectively. Both institutions are directly involved in matters relating to land acquisition and town planning. In this, they are supported by general town chiefs (representing towns within a particular area), who in turn are assisted by the towns chiefs of the respective towns.

5.3.12 Traditional Authorities

Traditional authorities are directly involved in customary land administration in their areas of jurisdiction, as well as in upholding cultural traditions, norms and practices. These authorities include the offices of paramount chiefs and clan chiefs, who are assisted by a council of elders.

5.3.13 Marvoh Development Association

The Marvoh Development Association represents the towns of Jawajei, Blain, Dieyili and Jenne Brown which are the deed holders (through the Darblo Clan) for portions of land located within the NLGM area. The deeded land includes the locations of Kinjor, Larjor and Jikando villages.

5.3.14 Project Affected Communities and Individuals

This group includes all people who may be directly or indirectly affected by the NLGM's presence. It includes communities located on land affected by the mine, communities adjacent to the mine, as well as Kinjor/Larjor communities that were directly affected by the project, and resettled, including host communities receiving resettled people.

The composition of the Kinjor Town Council consists of the following representatives:

- Six elders (councillors), one of which is the Dean Elder;
- Religious leaders (Pastor and Imam);
- Education (Kinjor school principal);
- Women and the youth;
- Artisanal Mining chairman;
- Marvoh Development Association; and

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- Zoe Elder (priest representing Poro and Sande traditional societies).

5.4 Civil Society and Non-Governmental Organizations

This group includes smaller groups in society who may have an interest in the NLGM and its social and environmental aspects, as well as NGOs representing particular interests. It includes members of the wider general public in Liberia and further afield, civil society Organizations such as religious groups, cooperatives, professional associations, cultural groups, citizens' associations as well as environmental and social groups. It also includes universities and other academic and research institutions undertaking work relevant to the NLGM project (e.g. on mining, sustainability, social and environmental issues, local and regional development, etc.) who may have views on the project or information that will be useful for the assessment and management of project impacts.

Opportunities for their participation in the project will be provided by direct contact with known groups, and by wide publicity for the SEP and events enabling other groups and individuals to make contact with the NLGM.

Consultation with civil society and local, national and international NGOs representing groups and interests that may be affected by the project is crucial to a credible ESIA process.

There are several Environmental and Social NGOs in Liberia who are actively involved with communities and government entities to ensure that the environment and affected persons are given a voice.

5.5 Environmental NGOs

- Fauna and Flora International
- Society for the Conservation of Nature
- Conservation International

5.6 Social NGOs

- Green Advocates
- Independent National Commission on Human Rights
- Sustainable Development Institute
- Merlin
- The United Nations Children's Fund (UNICEF)

5.7 International Organizations

Various international Organizations may have an interest in the NLGM project and may have useful information/ knowledge or insight into local and national issues of relevance to the project. These include UN agencies, as well as African and West African and other multilateral and bilateral development agencies.

5.8 Internal Stakeholders

Stakeholders who have an interest in the project and the ability to influence and be affected by the operation of the project. An important group requiring continuous engagement include decision makers responsible for environmental, communications, financial, social and human resources management.

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5.9 Internal Enablers for SE

The enablers listed below are mainly focussed on important components internal to the project, which includes management functions for SE. These enablers aim to ensure that supporting mechanisms are in place for SE to take place and include the following:

- **Systems:** will create approaches or tools that are required to ensure that SE activities can be implemented seamlessly. Under systems specific engagement activities can be planned in such a way that they keep on recurring and can even be made part of employee performance indicators. Having scheduled SE activities in place creates predictability in the eyes of the stakeholder and supports the fostering of a relationship based on trust.
- **Structure:** will ensure internal alignment and coordination between all parts of the company that are involved with SE. Putting a SE-focussed structure in place with the needed decision-making authority will enable SE activities for quicker turnaround time on Grievance feedback, responding to stakeholder questions and having key decision makers in the Organisation to attend meetings with key stakeholders. If the Organisation is structured to put the concerns of stakeholders at the core of processes and decision-making, then potential risks for the project can be identified and mitigated early.
- **Skills:** are required in order to effectively engage with stakeholders at all levels in the Organization and manage the SE process throughout the Mine Lifecycle. Internal capacity for SE is a critical component for the implementation of the SEP, since many of the activities are integrated with various departments within the Organization and SE might not be the core focus of some of the employees.
- **Staff:** addresses the number and capabilities of staff and contractors required to engage with stakeholders effectively. This enabler is closely linked to Skills and Structure since the number of SE-focused employees needs to be organised into a structure or team. It becomes even more important when making contractors and consultants part of the process as they will be seen as an extension of the Organization and stakeholders expect a constant style of engagement.

Internal enablers need to be measured to ensure that the Organization is able to execute SE activities successfully. These measurable components are explained as:

- **Activity:** the various operational SE tasks that will be undertaken as part of the SEP; _
Objective: the target that each activity needs to reach;
- **Key Performance Indicator (KPI):** a means by which achieving the objective can be measured;
- **Timeframe:** the time horizons for completing an activity; and
- **Medium:** the method used by which SE will be done (where applicable).

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Table 2: The internal enablers for SE are described in the table below.

No	SEC Activities	Objective	KPI	Time Frame(s)	Medium
Systems					
Engagement Plans/ Action					
1	Update the SEP annually and Implementation plan twice a year.	Ensure SEP is aligned with changing circumstances.	Approval of SEP, biyearly update.	Update SEP yearly and implementation plan bi-yearly	❖ Internal workshops
2	Ensure alignment between the SEP and communications / media plan.	Ensure that SE is consistent with relevant SEP components.	Implementation plans aligned with communications / media plan.	Immediate and update as needed	❖ Internal workshops
3	Establish external stakeholder forums and meet on a quarterly basis for: <ul style="list-style-type: none"> ❖ Inter-Ministerial ❖ NGOs ❖ Communities 	Ensure continued open communication channels with key stakeholders.	Established forums.	Immediate and update as needed	<ul style="list-style-type: none"> ❖ Structured agenda ❖ Focus group meetings ❖ Workshops ❖ One-on-one consultations
4	Develop quarterly SE feedback and project update report (Notes: can be integrated with the various established forums.)	Dispel any potential misinterpretation of project developments.	Standardized and recognized feedback report.	Immediately, ongoing	<ul style="list-style-type: none"> ❖ Report with structured content ❖ Focus group meetings forum
5	Implement internal stakeholder feedback process. (Notes: the grievance mechanism which is proposed can be used for this process, but not all feedback received from stakeholders are regarded as grievances. Hence, a separate process to manage	Keep track of stakeholder feedback internally.	Stakeholder feedback process for each stakeholder group.	Immediately, ongoing	<ul style="list-style-type: none"> ❖ Internal workshops ❖ Internal emails ❖ Suggestion boxes ❖ Surveys

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	stakeholder feedback needs to be developed.)				<ul style="list-style-type: none"> ❖ Community capacity ❖ building initiatives ❖ Grievance records ❖ CLT
Stakeholder Information					
6	Regularly review stakeholder trends and update stakeholder information. (Notes: it would be important to ensure that the communications / media plan is also focused to identify industry and/or stakeholder trends, especially considering media, journalists, NGOs, activists, academics and influencers situated inside or outside of Liberia.)	Understanding of stakeholder interests and expectation.	Updated SEP. Regular stakeholder research activities.	On-going Quarterly	<ul style="list-style-type: none"> ❖ Internal workshops ❖ Focus group meetings ❖ One-on-one consultations ❖ Surveys ❖ Online media / analysis
7	Identify issues that holds potential for stakeholder conflict. (Notes: identification of opportunities or issues which holds potential risk will come as a consequence of implementing the various components of the implementation plan. What would be a determining factor for effective management of the issues identified is the internal process assigned for managing issues / risks.)	Understand potential areas of conflict with stakeholders to ensure proactive mitigation.	Updated SEP. Regular stakeholder issues research activities.	Immediate, ongoing	<ul style="list-style-type: none"> ❖ Internal workshops ❖ Focus group meetings ❖ One-on-one consultations ❖ Surveys ❖ Online media / analysis ❖ Grievance issues database
Database					
8	Develop, implement and update stakeholder database tool.	Access to updated stakeholder information and engagement history.	Implemented stakeholder database tool.	By end 1 st quarter 2018	<ul style="list-style-type: none"> ❖ Internal training with SRK Richard Kettle
	Develop, implement and update issue database tool. (Notes: identification of opportunities or issues which holds potential risk will come as a consequence of	Identify potential stakeholder and project risks.	Implemented issue database tool.	Immediate, ongoing	<ul style="list-style-type: none"> ❖ Internal workshops ❖ Focus group meetings

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9	implementing the various components of the implementation plan. These issues must be fed into the database continuously.)		Integrated with Grievance Mechanism.		<ul style="list-style-type: none"> ❖ One-on-one consultations ❖ Surveys ❖ Online media / analysis ❖ Grievance issues database
10	Develop a document management system for all SE records. (Notes: Physical attendance registers are important for the continuous update of the stakeholder database and to have proof that stakeholders were informed or met with, should a legal dispute arise. The system needs to address requirements for filing physical and electronic records, especially grievances.)	Ensure compliance and management of potential project or stakeholder risk.	Developed and implemented document management system.	Immediate, ongoing	<ul style="list-style-type: none"> ❖ Grievance records ❖ Attendance registers ❖ Suggestion boxes ❖ Meeting minutes ❖ Surveys ❖ Ad-hoc stakeholder comments

Protocols

11	Integrate the stakeholder engagement policy with the EHS&S policy (Notes: the policy need to make clear the Organization's position on how SE will be conducted. From this policy protocols will be developed. It is proposed that the SE policy should include components of other communication disciplines e.g. media relations, public relations, marketing, management of information and internal communications.)	Define and consolidate Aureus Mining's communications in order to adhere to the Organization's strategy.	Developed and approved SE policy	March 21, 2018	Internal workshops
12	Develop SE protocols for all employees, consultants and contractors. (Notes: protocols need to feed through to decision-making, internal coordination,	Pro-active management of stakeholders and potential project / social risks.	SE protocol developed. SE protocols incorporated into induction and training material and	On-going Immediate	N/A

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	communication plans and the grievance mechanism.)		subcontractor agreements.		
Grievance Management					
13	Implement and update a stakeholder issue and grievance management process (see Appendix 2 for detail). (Notes: the grievance management process needs to integrate with decision-making, protocols, internal coordination and issues database.)	Accurate and timeous decision making on issues and grievances.	Approved and implemented Grievance Mechanism.	Immediate Update every quarter and at key project milestones.	<ul style="list-style-type: none"> ❖ Grievance records ❖ Attendance registers ❖ Suggestion boxes ❖ Stakeholder meetings ❖ Surveys
14	Develop and implement a communications / media plan for NLGM. (Note: the communications plan can include components such as disaster management communication, Public Relations, strategic communications; but should be underpinned by the Organization's corporate strategy.)	Create an overarching structure and general direction for NLGM communications.	Approved and implemented communication / media plan.	By end 3rd quarter 2018. Update quarterly	N/A
15	Continuous media monitoring and engagement. (Notes: media monitoring would consist of three components (a) monitoring for corporate risks (b) monitoring for NLGM risks (c) identification of industry trends and opportunities.)	Track external developments and mitigate potential risks.	Implemented media monitoring program.	On approval of ESIA update, ongoing	<ul style="list-style-type: none"> ❖ Online media ❖ Print media
Structure					
Establish Teams					
	Establish teams responsible for SE, resettlement, community development and communications. These must include the following levels of involvement:	Ensure integration and coordination of all communications functions.	Established and integrated teams.	Immediate – critical	Internal workshops

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16	<ul style="list-style-type: none"> ❖ A project Owner/Sponsor ❖ Relevant business <p>Directors/Managers (Notes: more than often good SE initiatives are implemented but do not reach potential because of lack of top management support.)</p>				
Internal Coordination					
17	<p>Establish an internal coordination structure for the implementation plan components and on-going internal interaction.</p> <p>(Notes: it is assumed that a single team will be established who would be responsible for all SE related activities. This team would need to establish the needed relationships with supporting departments e.g. HR, Logistics, Engineering, Corporate Affairs, Finance etc. This team would also need to have the needed Organizational support to be allowed to provide valuable and strategic inputs at critical decision-making milestones of the project.)</p>	Ensure internal alignment to identify and mitigate potential risks proactively.	Developed and implemented internal coordination structure.	Immediate – critical	Internal workshops
Decision Making					
18	<p>Formalize internal decision-making procedures and responsibilities with associated protocols.</p> <p>(Notes: decision-making protocols need to reflect the various components of the Implementation Plan.)</p>	Ensure quick response times to SE risks and grievances identified.	Developed and implemented decision matrix with protocols.	Immediate – critical	N/A
Skills					
Skills Assessment					

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19	Identify SE skills requirements for project staff and contractors.	Identify potential gaps for NLGM SE.	SE skills requirement matrix.	Immediate Update for key project milestones	Internal interviews
Training / Capacity Building					
20	Develop and implement specific training programme for SE to enhance consultants and contractor SE skills. (Note: the training content should include internal protocols, grievance mechanism process, decision-making process, culture and social challenges, stakeholder information and internal coordination.)	Address skills shortcomings for SE to mitigate potential risks.	Approved and implemented training plan.	Once skills assessment is completed Update for key project milestones	N/A
Staff					
Outsourcing					
21	Develop SE selection criteria for contractors. (Notes: criteria for selection should consider local cultural sensitivities, language proficiencies, SE experience, team composition, complexity of social risks and stakeholder requirements.)	Ensure contractors with the required SE skills are employed.	SE selection criteria incorporated into contracts.	End of 4th quarter 2018	N/A
22	Identify third party mediators for conflict resolution.	Strengthen conflict resolution capacity.	List of external facilitators and their areas of expertise.	End of 4th quarter 2018	N/A

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5.10 Levels of public participation

Stakeholder engagement is recognised as an essential component of the appraisal, management and monitoring of environmental and social issues associated with NLGM's programme.

In the context of public participation, a stakeholder can be defined as any person, or group, who has an interest in the project or could be potentially affected by its delivery or outputs. Each of these persons or groups require a specific level of participation throughout the project lifecycle. The CGRT commits to a set of broad public participation levels categorized in the table below.

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Table 3: Levels of public participation

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
Purpose:	To provide balanced, objective, accurate and consistent information to assist stakeholders to understand the project, the engagement process, and other relevant information.	To provide information, but also listen to stakeholders, obtain feedback, listen to concerns and answer questions.	To work directly with the stakeholders throughout the process to ensure their concerns and needs are consistently understood and considered in decision making processes.	To partner with the stakeholders including the development of alternatives, making decisions and the identification of preferred solutions.	To place final decision-making in the hands of the stakeholders.
Key message:	To keep stakeholders informed of project development and information relevant to the stakeholder group.	To keep stakeholders informed, listen to and acknowledge your concerns and provide feedback on how your inputs influence decisions.	To work with stakeholders to ensure concerns and aspirations are directly reflected in alternatives developed and provide feedback on how their input influenced the decision.	To obtain direct advice and innovation from stakeholders to assist in formulating solutions and incorporate their advice and recommendations in the decisions to the maximum extent possible.	To implement what actions the stakeholder decides.
Tools and methods of Stakeholder Engagement and Disclosure					
Methods and tools:	Fact sheets Posters Media interviews Maps Social and environmental reports Background information documents Newsletters, bulletins	Public meetings Focus groups Perception surveys Grievance log Individual meetings Interviews	Workshops Facilitated discussions Forums	Facilitated consensus building forums for deliberation and decision-making Participatory decision-making tools Working groups Committees	Facilitation of direct dialogue between stakeholders and power holders Local governance Joint planning Delegated decisions Working groups Committees

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Stakeholder	<ul style="list-style-type: none"> • Commenting authorities e.g. Ministry of Finance and Development Planning • Internal stakeholders • International Organizations • Commerce and Industry • Communities / traditional leaders 	Social NGOs <ul style="list-style-type: none"> • Environmental NGOs • Commerce and Industry • Civil society • Communities / traditional leaders • Commenting authorities e.g. Ministry of Finance and/or Planning and • Economic Development 	Social NGOs <ul style="list-style-type: none"> • Environmental NGOs • Civil society • Communities / traditional leaders • District / County authorities • EPA / FDA • Liberia Refugee, Repatriation and Resettlement Commission • Ministry of Health and Social Welfare • Ministry of Public Works • Ministry of Internal Affairs • Ministry of Agriculture • Ministry of Land, Mines and Energy 	<ul style="list-style-type: none"> • Marvoh Development Association • Internal stakeholders • Communities / traditional leaders • District / County authorities • EPA/ FDA • Ministry of Internal Affairs 	<ul style="list-style-type: none"> • Communities / traditional leaders • Internal stakeholders
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*It is noted that stakeholder groups might be categorized under different or more than one level(s) simultaneously, depending on the project phase or engagement activities.

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At each level of engagement, the table distinguishes between the purpose of the engagement from the CGRT perspective, the key message being shared with the stakeholder and the tools and methods that can be used to enable this. As the table moves from “inform” through to “empower”, there is a corresponding increase in the expectation for stakeholders to participate and impact upon RAP activity. This table will be used as a reference for the engagement types and tools required in the on-going implementation of the resettlement process and the CGRT engagements with stakeholders.

The CGRT will endeavour to make sure all stakeholders, identified, understand what is planned and how the Project will affect them, as well as understand their issues and concerns and take these into account on the Project design decisions included in the RAP. This will involve the RC team working with the different stakeholders in different ways.

All stakeholders will be informed and consulted with throughout the resettlement planning and implementation process. All of these engagements will be recorded and logged in the ShEDS. Engagements will involve use of data collection tools such as surveys and focus groups, provision of information in accessible formats, and recording of all concerns and issues raised.

Public meetings will enable both affected and interested parties to be kept informed and to have their concerns and issues listened to and addressed.

5.11 Stakeholder Analysis

NLGM defines stakeholders as two distinct groups, external and internal stakeholders who have an interest in a particular decision, either as individuals or representatives of a group including people who influence a decision or can influence it, as well as those affected by it.

The Internal Stakeholders generally applied to Avesoro/NLGM employees, shareholders, sub-contractors that may be affected in some way by the project activities; these effects may be economic and social as well as environmental in nature. External Stakeholders include the inhabitants of immediate and surrounding communities, GoL, and non-governmental organizations.



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Table 5 Stakeholder Analysis

Stakeholder groups	Stakeholders	Description	Interest in the project	Importance of stakeholder for success of project	Degree of influence of stakeholder over project
Government of Liberia (GoL)	-National Legislature -Ministry of Foreign Affairs Ministry of Lands, Mines and Energy -Ministry of Finance and Development Planning & the Liberia Revenue Authority -Ministry of Labour -Ministry of Internal Affairs -Bureau of Concession -National Investment Commission -Immigration -Bureau of Custom	There is reportedly a good relationship between the Project and the GoL. A Mineral Development Agreement was made between GoL and Bea Mountain Mining Company (BMMC) for the development and operation of New Liberty Gold mine (NLGM).	<ul style="list-style-type: none"> • Tax revenue and royalties to make money for the GoL • Ministries with varying interest in the Project e.g. environment, health – interested in how the Project will comply with laws and regulations • Interested in the potential for the Project to deliver some basic services to local residents. 	5	5
	Ministry of Health	Responsible for health infrastructure and provision in Liberia. Have signed an MOU with NLGM to provide staff for a primary health clinic constructed in New Kinjor by NLGM.	<ul style="list-style-type: none"> • Interested in providing basic healthcare delivery to concession community and staffing health facilities provided by NLGM with professional health workers. • Interested in responding to health risk created by NLGM through influx and over-crowdedness in 	5	5



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Stakeholder groups	Stakeholders	Description	Interest in the project	Importance of stakeholder for success of project	Degree of influence of stakeholder over project
			New Kinjor and other concession communities in BMMC's Class A license area.		
	Ministry of Internal Affairs (MIA)	Local representation and administration of traditional culture and sacred societies. Decentralised arm of the government directly involved in customary land administration in their areas of jurisdiction, as well as in upholding cultural traditions, norms and practices. Traditional Council of Chiefs, paramount chiefs and clan chiefs, general chiefs, and town chief, assisted by dean of elders.	<ul style="list-style-type: none"> May have a more localised interest in the Project such as employment and local procurement which will be felt locally. Look to the Project to help bridge the gaps created by the national government's shortfall Chiefs represent the community and have an invested interest in the outcome of the project. Decide who can own what land so are interested in how the resettlement process will be carried out. 	4	4
	Liberian Environmental Protection Agency	<ul style="list-style-type: none"> to monitor and supervise the protection of the environment and sustainable use of natural resources. Grants environmental permit to BMMC 	<ul style="list-style-type: none"> Interested in how the Project will ensure environmental protection in the project area Interested in how the Project will manage any risks it may place on public health. 	4	4
NGOs	E.g. AgroTrade, Green Advocate, International Commission on Human Rights (INCHR), WHO, UNFPA, JHPIEGO, Care, MTI, UN-Women, Inter Religious Council,	Non-governmental organisations (national and international) in support of good social and environmental practice.	<ul style="list-style-type: none"> Monitoring economic impact of project on local inhabitants Advocacy on behalf of local inhabitants regarding project effect on locals Monitoring delivery on CSR Monitoring compliance with environmental safeguards Development partners Implementation partners 	3	3



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Stakeholder groups	Stakeholders	Description	Interest in the project	Importance of stakeholder for success of project	Degree of influence of stakeholder over project
	Accountability Lab Liberia, Edu Care Liberia-UN Peace Building Fund,				
Local and national media	Radio Cape Mount, Radio MAWONET, Radio, Salime, TOP FM, Radio PISO, ELBC, Voice FM, and Newspaper outlets.	Media outlets and bodies	<ul style="list-style-type: none"> Monitoring compliance with Liberian labour laws Project impact on local communities Monitoring delivery on CSR Monitoring compliance with industry standards Information sharing to the public 	4	3
Directly Affected People	Directly affected economically and physically displaced people men, women and children – ‘yellow paints’	<p>A total of 322 households resettled by NLGM.</p> <p>Temporary and new settlement named New Kinjor.</p>	<ul style="list-style-type: none"> Host community Potential employment and or economic opportunities Dependence on the mine for social and economic needs e.g. housing, social infrastructure, employment. To date livelihood restoration has had some success but needs improvement. 	4	4
	Artisanal miners	Historically the residents of Kinjor and Larjor were artisanal miners and there have been some artisanal mining activities within the project footprint and within the Class A licence area, for example, Sarama	<ul style="list-style-type: none"> Tensions between ASM miners and Project. Potential damage to mine related infrastructure 	3	3
	Community cooperatives	Community work together to provide services to the NLGM. But, all of these activities are unsustainable. e.g. wood cooperative, temporary support scheme	<ul style="list-style-type: none"> Dependent on the project as a purchaser of products. i.e Wood cooperative used for the 	2	2



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Stakeholder groups	Stakeholders	Description	Interest in the project	Importance of stakeholder for success of project	Degree of influence of stakeholder over project
		(community sand supplier group), Community Extended Guard Service, set up by NLGM	construction of the new houses, Sand used for construction work, and Employment		
Indirectly Affected People	Initial influx of people – ‘blue paints’	After the RAP cut off census, a further 265 households moved into the area. To distinguish between these and the PAPs, the ‘encroachers dwellings’ were marked with blue paints	<ul style="list-style-type: none"> Interested in available compensation resources from the Project - The Project to provide some support to relocate: land and building materials. Potential employment and or economic opportunities 	3	3
	Second influx of people in which the Project has no responsibility for	After the initial influx of ‘blue paints’ there has been further population increase in households in New Kinjor, which NLGM holds no responsibility for.	<ul style="list-style-type: none"> Potentially in search of employment and or economic opportunities. 	2	2
Original land owners and custodians	Marvoh Land owners (Jawaije-Marvoh, Deayelee, Blain, Jenne-Brown) Blain, Darblo Clan Towns	These are the original land owners and who NLGM has a land lease agreement and sold a 150 acre of resettlement land for the people displaced by the project footprint.	<ul style="list-style-type: none"> Original owners of the land; Interested in social benefits from land lease and land sale agreements Economic benefits and potential employment for them Improved access market roads Environmental protection and sustainable land use by the project 	3	3
Project affected communities	Jikando settlement - located about 5 km downstream from mine site and tailings storage facility (TSF)	Livelihoods largely based on subsistence agriculture and fishing in streams and rivers. Road built to Jakando, from New Kinjor, a bypass necessitated by the creation of the TSF.	<ul style="list-style-type: none"> Effect of the TFS on settlement water supply, particularly in relation to fishing and drinking water Effect of blasting sound from the project site Potential employment and or economic opportunities 	2	2



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Stakeholder groups	Stakeholders	Description	Interest in the project	Importance of stakeholder for success of project	Degree of influence of stakeholder over project
	Madina and Korma settlements	Settlements further downstream (11-12 km) of the mine and TSF	<ul style="list-style-type: none"> Potential employment and or economic opportunities Effect of the TFS on settlement water supply 	2	2
	Jawajei, Ganganma, Silent Hill, and Vai Town settlements	Settlements within 5 km of the project	<ul style="list-style-type: none"> Potential employment and or economic opportunities Effect of dust from blasting on project site Effect of blasting sound from the project site 	2	2
	Daniels Town	Daniels town is a small settlement along a road that experienced minor physical and economic displacement by the mine access road.	<ul style="list-style-type: none"> Potential employment and or economic opportunities Access market road 	2	2
	Sinje	Sinje is the nearest settlement with government medical facilities and education facilities beyond primary.	<ul style="list-style-type: none"> Potential for increased spending in the town could support economic development. Improved access for economic opportunities, including employment, knowledge, and new skills transfer. 	2	2
	Other settlements in and outside of Grand Cape Mount County		<ul style="list-style-type: none"> Attracted by the perceived opportunity the project offers for employment, knowledge and new skills transfer 	2	2
	Local suppliers	In order to comply with the Mineral Development Agreement, NLGM should support a number of local content. Many spin-off opportunities have been replaced by Liberian firms, apart from a wood cooperative, bricks suppliers, sand suppliers and a struggling tailoring initiative.	<ul style="list-style-type: none"> Interested in supporting the project with goods and services Interested in inclusive growth opportunities from the project 	2	2



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Table 5: Internal Stakeholders

Stakeholder groups	Stakeholder groups	Description	Interest in the project	Importance of stakeholder for success of project	Degree of influence of stakeholder over project
NLGM Staff	NLGM Community and Government Relations Team (CGRT)	The team have prepared a work plan on social obligations, in agreement with the original land owners and the GoL	<ul style="list-style-type: none"> Link between the Project and the community, with an interest in building a good relationship between the two. To facilitate implementation of social obligations associated with the Project, which will benefit the community, and secure the project's social license to operate 	4	3
	Mine site employees / NLGM Workers Union	Mine workers now have a Union and a Collective Bargaining Agreement with NLGM. More than 800 Liberians are employed by the project, including over 200 PAPs.	<ul style="list-style-type: none"> Potential for acquiring new skills and training Providing services and gaining income from jobs offered by the mine's operation 	4	4
International Finance Institutions (IFIs)	IFC, Ned Bank, Standard Chartered Bank	IFC had an equity investment in the NLGM project and required extensive review and revision of the mine's ESMP prior to making an investment. Seeks transparency and accountability in the implementation of the Project.	<ul style="list-style-type: none"> Want the project to be successful Require evidence of security of their investment/ loan Interest in how compliant the Project is with national and potentially international obligations Want value for money spent on the project. 	5	5



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Table 6: Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Scope of Engagement	Engagement Method	Frequency	Record Station
Government Engagements				
GoL	<ul style="list-style-type: none"> to update the agency on NLGM's activities, and the Governmental permitting processes, which includes permits; to convey the good intention of NLGM to minimise the possible negative effects of the mine activities; to understand and respond to their concerns/suggestions about the Project; to understand, develop and agree livelihood restoration measures for artisanal miners; to implement livelihood restoration measures successfully against agreed laws/policies. Information sharing with authorities about the NLGM ESIA, and other ongoing studies; Information gathering from the official records as needed; Information sharing with the District Governor and the Mayor regarding ongoing studies and activities, including livelihood restoration; Information sharing with the education authorities, including possible training partnerships. 	Meeting/ Briefing	Quarter or as necessary	ShEDS
IFIs	<ul style="list-style-type: none"> Interaction at this level is twofold: On the one hand, engagements with financial stakeholders is handled primarily by the London office (which is Corporate Policy). However, the relevant information derived from that engagement will loop back into the ShEDS. On the other hand, those issues regarding compliance or non-compliance with IFC's standards that may be raised as a grievance during stakeholder's engagements and be resolved or not resolved. 	Meeting, Teleconference	Yearly or as necessary	ShEDS
NGOs	<ul style="list-style-type: none"> Integrity institutions Advocacy Awareness creation on compliance issues Work safety and healthcare delivery Social welfare Knowledge transfer Meeting CSR 		Quarterly Quarter or as necessary	ShEDS
Community Engagement				



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CR	<ul style="list-style-type: none"> Relationship between mine and community Discussion on project progress and issues 	Meeting; one-on-one, focus groups	Weekly	ShEDS
PAPs	<ul style="list-style-type: none"> Information sharing on status of outstanding social benefits Training and transfer of knowledge and job skills Employment opportunities to identify land owners and share information; to update land owners on NLGM's activities, to convey the good intention of NLGM to minimise the possible negative effects of the mine activities to obtain information on owners and users of land as part of the development of a Livelihood Restoration Plan; to understand and respond to their concerns/suggestions about the Project; to understand, develop and agree livelihood restoration measures for shepherds; to implement livelihood restoration measures successfully against agreed decision. Healthcare delivery Community meetings 	Meeting	Monthly	ShEDS
Informal Consultation				
Other settlements in and outside of Grand Cape Mount County	<ul style="list-style-type: none"> Employment opportunities offered by the mine Inclusive growth opportunities Training and Skills transfer 	Meeting, brief	Monthly or as necessary	ShEDS
Media	<ul style="list-style-type: none"> Community issues, regarding outstanding commitments Resettlement Project issues, concerns, and grievances 	Meeting, discussions, brief	Monthly	ShEDS
Community & Employee Relations				
NLGM Workers Union/Staff	<ul style="list-style-type: none"> Conditions under which they work (Safety) Compensation Training and Skills transfer Technology Benefits 	Meeting	Daily or as necessary	ShEDS



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Table 7: Summary of Consultation Phases

Stage	Purpose
Stage 1: Scoping engagement	<p>National, regional, district and local level engagement to provide the following information:</p> <ul style="list-style-type: none"> • Project updates regarding the nature, scale and purpose of the project; • ESIA and stakeholder engagement process; • Disclosure of scoping and preliminary ESIA findings, including identification of impacts; and • Grievance mechanism. <p>A key purpose of the meetings was also to collect information on stakeholder opinions and concerns relating to the project and potential impacts.</p>
Stage 2: Draft ESIA Engagement/ ESIA Disclosure	<ul style="list-style-type: none"> • National, regional, district and local level engagement to provide the following information: • Updates regarding the nature, scale and purpose of the Project; • ESIA and stakeholder engagement process; • Disclosure of ESIA findings and mitigation measures; • Grievance mechanism with early identification of contentious issues; and • Local and traditional knowledge that may be useful for decision-making for a transparent, accountable and inclusive process.
Stage 3 Resettlement Action Plan (RAP)	<p>Regular engagement with institutions, communities and people directly and indirectly affected by the Project throughout the preparation and implementation of the RAP for the following:</p> <ul style="list-style-type: none"> • Provision of Project updates to community leadership structures, traditional and administrative; • Provision of Project updates and collection of information through meetings, focus group discussions and household surveys with Project Affected People (PAPs); • Recording and resolution of grievances raised against the Project or associated implementation processes.
Stage 4: Project Implementation (construction and operation)	<p>The Project will continue to engage with stakeholders to inform them of Project activities and to undertake specific activity-based assessment, to monitor the effectiveness of mitigation measures through the management plans and to maintain good relationships and ownership of the Project throughout operation and construction. This will be through meetings and other forms of information dissemination.</p>
Stage 5: Decommissioning	<p>Prior to decommissioning, NLGM will prepare a Site Closure Plan for the Project. The Project will consult with stakeholder groups to ensure that feedback regarding the impacts of decommissioning is considered in the Plan.</p>

5.12 Summary of stakeholders consulted

National government

- Environmental Protection Agency of Liberia;
- Ministry of Lands, Mines and Energy;
- Forestry Development Authority (EIA Department, Conservation Department, GIS Department)
- Hydrological Service of Liberia; and
- Ministry of Internal Affairs.

5.13 Issues Raised by Stakeholders during early engagement

Stakeholders raised numerous issues during the early engagement. The key issues are summarised based on the frequency of the questions asked at each stage of engagement listed.

Table 9: Issues raised by Stakeholders During Early Engagement

Stakeholder group	Frequently Asked Questions
Directly Affected Communities	Will there be relocation of the villages due to mine operation?
Directly Affected Communities	What are the possible effects of cyanide to our life and livelihood?
Directly Affected Communities	What are the main environmental precautions to protect the water sources and crops from dust, and the chemicals?
Directly Affected Communities	What are the main protection measurements for drinking stream water?
Directly Affected Communities and EPA	From which sources will you supply the water for the mine construction and the operation?
Directly Affected Communities	Will you use the village roads to access the mine site in the future?
Directly Affected Communities and GoL	What will be the benefits of the mine for the locals? Will there be employment opportunity for the locals?
Directly Affected Communities	What will replace the loss of artisanal mining?
Directly Affected communities	When the construction and operation works will start?
Directly Affected Communities	How will the company manage the local employment process?
Directly Affected Communities	What are the possible effects of cyanide to the community health, water sources, soil, and the environment? What are the precautions for cyanide usage?
Directly Affected Communities	Where the mine road will be constructed?
Directly Affected Communities and EPA	How the company will manage the mine wastes?

6 PRIMARY CONSULTATION AND DISCLOSURE METHODS, TOOLS & ACTIVITIES

The primary methods of engagement with communities and stakeholder groups are as follows:

Methods applied with Communities of Interest:

- Household Visits/Consultation
- Participation in Community Development Programmes
- Artisanal mining User Groups
- Focus Group Discussions and Workshops
- Local Community Meetings
- Surveys and Interviews
- Public Events, Education & Outreach
- Site Tours
- Newsletter

Methods applied with Stakeholder Groups:

- Meetings and Sessions with Liberian Government authorities
- Site tours
- Meetings with affected communities, NGOs, and interest groups
- Media
- Newsletters
- Avesoro Website
- Monthly/Quarterly/annual report
- EITI (Extractive Industries Transparency Initiative) Reporting

All engagements are informed by clearly defined principles that demonstrate value for parties in the engagement process. The matrix below summarizes the principles underpinning stakeholder engagements:

Table 13: Engagement and Disclosure Methods for Different Stakeholder Groups used

Stakeholder group	Key engagement and disclosure methods
Economically displaced people in the ESIA Permitted Area	Individual and group meetings with artisanal miners, surveys, focus group meetings, workshops, and livelihood restoration programs (as agreed), local disclosure materials
Land owners and land users around and access road	Land use assessment to identify potential land owners and land users who may be affected by the project. Individual and group meetings, surveys, focus group meetings and livelihood restoration programs (as agreed), local disclosure materials
Vulnerable Groups	Household visits, individual meetings, specific invitation to focus groups and workshops, local disclosure materials
Local County Authorities	Formal meetings, individual meetings, focus groups and workshops, CR site visits, local disclosure materials
Local Businesses	Individual discussions, questionnaires, focus groups and workshops, supplier development programme
Local CBOs/NGOs	Open Days, information sharing, individual meetings, focus groups and workshops, community development programmes (as partners)
Project Employees	site office and internal communications, individual discussions
General Public	Newspapers, radio, public meetings, website
National/International NGOs	Site tours, individual meetings, newsletter, workshops, community development programmes (as partners)



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Table 14: Underlining Principles of Stakeholder Engagement Matrix

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
Purpose:	To provide balanced, objective, accurate and consistent information to assist stakeholders to understand the project, the engagement process, and other relevant information.	To provide information, but also listen to stakeholders, obtain feedback, listen to concerns and answer questions.	To work directly with the stakeholders throughout the process to ensure their concerns and needs are consistently understood and considered.	To partner with the stakeholders including the development of alternatives, making decisions and the identification of preferred solutions.	To place final decision-making in the hands of the stakeholders.
Key message:	To keep stakeholders informed of project development and information relevant to the stakeholder group.	To keep stakeholders informed, listen to and acknowledge your concerns and provide feedback on how your inputs influence decisions.	To work with stakeholders to ensure concerns and aspirations are directly reflected in alternatives developed and provide feedback on how their input influenced the decision.	To obtain direct advice and innovation from stakeholders to assist in formulating solutions and incorporate their advice and recommendations in the decisions to the maximum extent possible.	To implement what actions the stakeholder decides.
Tools and methods of Stakeholder Engagement and Disclosure					
Methods and tools:	Fact sheets Posters Media interviews Maps Social and environmental reports Background information documents Newsletters, bulletins	Public meetings Focus groups Perception surveys Grievance log Individual meetings Interviews	Workshops Facilitated discussions Forums	Facilitated consensus building forums for deliberation and decision-making Participatory decision-making tools Working groups Committees	Facilitation of direct dialogue between stakeholders and power holders Local governance Joint planning Delegated decisions Working groups Committees
LEAD	CGRT	CGRT	CGRT	CGRT	CGRT

At each level of engagement, the matrix distinguishes between the purpose of the engagement from the RAP perspective, the key message being shared with the stakeholder and the tools and methods that can be used to enable this. As the table moves from “inform” through to “empower”, there is a corresponding increase in the expectation for stakeholders to participate and impact upon RAP activity. This table will be used as a reference for the engagement types and tools required during the implementation of the resettlement process.

The RAP team will endeavour to make sure all stakeholders, identified, understand what is planned and how the Project will affect them, as well as understand their issues and concerns and take these into account on the Project design decisions included in the RAP. This will involve the RAP team working with the different stakeholders in different ways.

All stakeholders will be informed and consulted with throughout the resettlement planning and implementation process. All of these engagements will be recorded and logged in the ShEDS. Engagements will involve use of data collection tools such as surveys and focus groups, provision of information in accessible formats, and recording of all concerns and issues raised.

Public meetings will enable both affected and interested parties to be kept informed and to have their concerns and issues listened to and addressed.

6.1 CONSULTATION ACTIVITIES UNDERTAKEN TO DATE

Majority of engagement with stakeholders has been associated with formal environmental regulatory processes and divided into two main events, namely, SE for the EIS process completed in June 2012 and the SE required as part of development of the RAP and CDP during 2012/2013. The activities associated with SE are set out below:

Table 8: Summary of Early Engagement

Date	Stakeholder Group	Stakeholder	Engagement type	Purpose of engagement
Nov. 27, 2011	Women and youth leaders of Larjor and Kinjor	Internal	Meeting	To introduce the RAP study and timeline
Nov. 28, 2011	Environmental Protection Agency of Liberia (EPA)	External	Meeting	To Introduce the RAP
Dec. 13, 2011	Internal Affairs, County, District and Darblo Clan Officials	External	Meeting	To introduce the RAP study to the broader community and authority structures
March 2012	Marvoh Development Association	Internal	Meeting	Negotiate about the land
May 2012	Superintendent of Cape Mount County	External	Meeting	To explain company's plans and intent of the Resettlement
May 2012	Ministry of Public Works	External	Meeting	To understand national legislation about the standards on housing in Liberia
May 2012	Liberia Refugee Repatriation and Resettlement Commission (LRRRC)	External	Meeting	To understand the procedures or processes that the LRRRC has in place about resettlement
May8, 2012	Liberia Extractive Industries Transparency Initiative (LEITI)	External	Meeting	To know the role LEITI would play in the RAP process
8 May 2012	National Land Commission	External	Meeting	To know the policies, they have in place with regard to resettlement

8 May 2012	Ministry of Agriculture	External		to know if there are approved price listing for crops for compensation purposes
May 2012	General Town Chief	Internal	Meeting	to introduce the Project and the RAP, and to know about the traditional procedures in land acquisition
May 2012	Paramount Chief and District Commissioner	Internal	Meeting	To help identify areas for the relocation of Kinjor and Larjor, as well as how to proceed with land acquisition
Nov. 16, 2012	Ministry of Agriculture	External	Meeting	To discuss the RAP and CDP
June 15, 2013	EPA	External	Meeting	To discuss the grave relocation programme
Nov. 26, 2011	Jikando and Jawajei leaders	Internal	Meeting	to introduce Digby Wells/ Earthcon team
Nov. 27, 2011	Kinjor and Larjor communities	Internal	Meeting	To introduce the RAP study and timeline
Dec. 13, 2011	Directly Affected Communities	Internal	Meeting	To initiate the RAP process and announce a moratorium on further development in Kinjor and Larjor
Jan. 20, 2012	Kinjor and Larjor Communities	Internal	Meeting	To compile the RAP Committee
Feb. 2012	Resettlement Committee	Internal	Meeting	To discuss the roles and responsibilities of the committee and to receive grievances from the community;



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Mar. 8-9, 2012	Chief, Mining Chairman, Imam, Pastor, Youth Chairman, Chairlady and School Principal of Affected Communities	Internal	Meeting	To discuss their roles in the community
May 2012	RC	Internal	Meeting	to explain the next step of the RAP process
May 2012	RAP Committee	Internal	Workshops	to discuss and practically demonstrate Resettlement site selection, house design and town layout, and the livelihood restoration plan
May 14, 2012	EPA director	External	Consultation	To discuss if a separate EIA should be conducted for the resettlement site
May 19, 2012	Jikando elders	Internal	Meeting	To discuss if Jikando will be resettled or not
Aug. 13, 2012	RC	Internal	Workshop	To discuss the first draft of the town layout and house design
Sept. 15, 2012	Kinjor and Larjor communities	Internal	Meeting	To discuss town layout and design after the first draft was presented.
Oct. 26, 2012	RC	Internal	Meeting	To explain the next steps in the resettlement process
Oct. 29, 2012	grave owners	Internal	Meeting	To discuss the requirements needed for the grave relocation
Mar. 26, 2013	RC	Internal	Meeting	To show the new mine plan and announce a moratorium on the affected areas
Mar. 29, 2013	Jawajei elders	Internal	Meeting	to discuss the damage to the sacred site at the river diversion



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May 2013	RC	Internal	Meeting	To discuss the grave relocation site.
Jun. 10-14, 2013	RC	Internal	Meetings	to finalise compensation packages, revised town layout plan and additional compensation option
Jun. 10-14, 2013	Relatives of affected graves	Internal	Meetings	To discuss grave relocation aspects

7 APPROACH TO RELOCATION AND RESETTLEMENT FOR THE PROJECT

The development of the NLGM was preceded by the resettlement of Kinjor and Larjor residents (2, 077 people in January 2013), as well as the replacement or compensation of all dwelling- and business structures, community facilities, economic trees, agricultural fields, graves and sacred sites located within the proposed mine footprint and associated 500m blasting zone.

In undertaking responsibilities for resettling individuals and households and in relocating public facilities, NLGM have adopted the following principles, for purposes of the SEP specifically, based on existing legislation and company policy:

- Respect for civil and political, economic and social rights of citizens during the relocation of settlements in accordance with international conventions and national legal standards;
- The right to timely information on the terms and conditions of resettlement;
- The right to reasonable relocation deadlines;
- The right to full and timely information on legal and other rights in the process of resettlement;
- Clear definition of obligations;
- Encouraging economic and social development programmes that will include support for employment of local population; and
- Encouraging economic multi-functionalities of the area, i.e. the stimulation of production and service activities in order to diversify the economic structure, to improve the social and cultural development and maintain satisfactory environmental quality.

7.1 Land Acquisition and Resettlement Completed for the Project-

The Spatial Plan for the area of the ESIA prepared for the open cast mine identified the need for expropriation of lands and buildings being used for the following purposes, namely:

- 150 acres on which the household structures are constructed, including:
 - agricultural land;
 - forest land;
 - cemetery;
 - housing units;
 - markets and workshop working areas;
 - church mosque and schools;
 - landfill and sewage areas; and
 - relocation of remains.

To date, the security of the first two items on the list above, the agriculture and forest lands, have been undermined by influx of new arrivals who are adding to already existing temporary human settlements. New arrivals have been drawn into this area in search of the perceived employment opportunity offered by the mine. The remaining half of the 150 acres is for the permanent settlement where 322 housing units have been completed and keys and certificates of ownership presented to the owners. But, even though all the certificates of ownership have

been given out and the permanent houses delivered, it is highly unlikely that the owners of these temporary houses will demolish them to restore the area to agriculture land.

7.2 Replacement Building Design and Village Layout

NLGM replaced existing community facilities at Kinjor and Larjor with improved facilities. In addition, NGLM provided the PAPs basic services to ensure that their living conditions were improved. These have included water provision (boreholes/hand pumps), toilet facilities, a school facility, market and business facilities, as well as refuse disposal facilities.

The Project consulted with the Liberian Ministry of Health with regards to the requirements for the establishment of a clinic and associated service delivery aspects. Today, the clinic construction has been completed and is providing healthcare delivery services to the PAPs under the Government's Ministry of Health (MoH) staff.

After due consideration of community preferences and skills levels available for the project, a proposal for a house design, which also included extension of livelihood advantages as well as business related markets, was presented and accepted by the Resettlement Committee and affected community members.

The above agreement includes the building of well-designed two-room houses, designed in consultation with the RC and involving each of the relevant community members. It was also agreed that the community would be involved in the actual building of the houses in order to enable affected people to use this skill for future extensions and/or setting up their own building contracting enterprises. All 322 housing units have been completed and turned over to beneficiaries.

7.3 Compensation Entitlement Framework

Eligible groups under the RAP and the various categories of resettlement entitlements and restoration measures have been determined in terms of the relevant Liberian legislation and IFC PS5. These entitlements included additional measures to comply with any specific requirements of IFC PS5. A priority area for the RAP implementation was the development and implementation of the CDP. However, the CDP developed for the resettled people was found unfit for purpose, while efforts toward providing opportunities for livelihood restoration and associated support has lagged behind, in addition to broad-based community development projects in all the directly affected communities.

7.4 Key Issues Identified

Comments raised by stakeholder through the consultation process provided insight to various issues applicable to the proposed project. These need to be managed proactively and in many cases, effective communication and participatory approaches when engaging with stakeholders will prevent issues becoming grievances. In the table below, these key issues are listed and described. The proposed SE Implementation Plan for resolution addresses each of the issues raised.

Table 10: Summary of key issues identified

No	Issue	Description
1	Availability of clean drinking water	People use water for own consumption and that of their livestock. High dependence on boreholes and hand pumps – it is expected from other parties to provide this infrastructure.
2	Timber cutting regarded as important means of livelihood	People, usually men, make a living from logging and the mine's presence might be perceived as a threat to their future and ability to provide since fields might be cleared.
3	Uncertainty about the project's impact on the livelihoods of community members	With high illiteracy levels it is difficult for people to envisage what the mine will look like and how they will be affected. Because of this, uncertainty is created around their future and food security.
4	Loss of artisanal mining	This is regarded as a good form of income generation and people will be more inclined to defend their "rights" to mine at specific areas.
5	Impact of project on forest reserves	How much land will be used for mining operations and how will it be managed is an important concern of the FDA.
6	Increased community expectations	These expectations revolve mainly around social development initiatives and employment opportunities.
7	Land belongs to the communities / people	Everything above ground is regarded to belong to the people, hence, communities. The FDA, Ministry of Internal Affairs and Land Commission is well aware of this and people need to be consulted before major decisions are taken that impact the environment.
8	Uncertainty around displacement	Various aspects of people's lives will be impacted, and they aren't always sure how and when this will happen. The extent thereof and their means to recourse are usually uncertain also.
9	Legacy commitments not addressed	Promises were made by previous companies and not fulfilled. This causes doubt, and, in some cases, fear associated with a new company engaging people.
10	Alignment between Ministries	Ministries do not always engage with each other on matters that would be beneficial to the project. Because of this important message and information is often lost, which causes misunderstanding and, in some cases, wrong decisions to be taken.

Specific concerns and issues identified and addressed during the development of the RAP are discussed below.

Table 11: Main RAP grievances and concerns received to date

Grievance	Comment
There are too many community meetings. Aureus should proceed as soon as possible	Focus is now on weekly meetings with RC. Community meetings will be called as required.



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Aureus should do more to provide employment, training, supports to the Kinjor/Larjor affected people	Aureus has already and will continue to establish local employment projects as part of the RAP and general NLGM construction activities. Aureus will, through its CDP and CSR Projects, promote training and scholarships for affected people.
Individual claims that property owner was not present during asset survey. Requested that Aureus should accept late claims (i.e. claims received after the survey cut-off date)	No claims were accepted after the RAP cut-off date as was agreed with the community and authorities.
Individual claims that the asset survey did not record all rooms/economic trees/graves	Claims were investigated, and records were adjusted if claims proved to be correct
Individual claims with regard to ownership of certain properties	Claims were investigated, and records were adjusted if claims proved to be correct
Concerns with regards the placement and number of toilets allocated at resettlement site	Aureus held several meetings with RC to address this concern. An agreement was reached based on environmental and cost considerations
Tree compensation should be paid prior to resettlement	Agreement was reached that compensation payments will involve two instalments, the first of which will be paid prior to physical resettlement
There are too many consultations with regards the grave relocation. People do not want to be involved – as long as existing graves are not reburied at the resettlement site	Agreement was reached with affected families and no further consultations are required
Business owners should not be penalised for the fact that some run unregistered businesses from their house	This was agreed with RC and business owners
The Resettlement Committee does not adequately disseminate information to the community	The NLGM CLO and RC will ensure adequate dissemination. This process will be recorded in the RC minutes
Grievance lodged with regard to damage to sacred site by NLGM contractor	A (written) agreement was reached with the affected parties. All conditions have been met by Aureus and compensation payments have been made
Request assurance that temporary relocation will not alter the entitlements of the RAP	Resettlement will be implemented in accordance with the RAP. All RAP entitlements will be honoured

7.5 Regional and district government

Superintendent of Grand Cape Mount County and her representatives.

Community stakeholders (i.e. the public, including the chiefs, their elders and representatives, youth group leaders, women's group leaders and the general population in each village) were consulted at the following locations:

- Mecca, Cape Mount County;
- Kinjor and Larjor Villages;

- Jawajei Village; and
- Sinje Town.

Environmental bodies, both authorities and NGOs, (for example, Conservation International) and the media.

7.6 Summary of SE activities

Project announcement

- Formal announcement of the project in September 2010 by means of a letter with comment sheet and Background Information Document (BID).
- Radio announcement on 17 September on Radio Cape Mount for two weeks.
- Announcement materials were available on the Golder website (www.golder.com/public).
- Three community meetings and five focus group meetings were held during this phase.
- BIDs and announcement letters were distributed at the following locations:
 - Ministry of Lands, Mines and Energy, Monrovia;
 - Forestry Development Authority, Monrovia;
 - Ministry of Internal Affairs, Monrovia;
 - Environmental Protection Agency, Monrovia;
 - Mecca Village, Grand Cape Mount County;
 - Kinjor Village, Grand Cape Mount County;
 - Jawajei Village, Grand Cape Mount County;
 - Radio Cape Mount; and
 - EarthCons Offices, Monrovia.

8 PROPOSED EXPANSION PROJECT

In addition to the NLGM project, efforts are now underway to expand mining activities to Ndablama, one of the exploration tenement under the BMMC Class A license. Drilling at the Ndablama/Gold Camp site is expected to begin in Q1 2019, with a potential to expand to other licensed tenements, such as Weaju, Silver Hill/Manbong, Archean West, Yambesi (Diabowo area), and Matambo Corridor/Sarama. Successful drilling results from Ndablama may invariably bring nearly all of the Gola Konneh District and parts of Tewor District (Grand Cape Mount County) communities into the mining spheres of BMMC's Class A license area.

Data from the exploration work in Ndablama do not suggest any potential relocation of the communities in the drilling area. But, should this become apparent, the need for a Resettlement Action Plan and a corresponding stakeholder engagement plan will be considered.

9 STAKEHOLDER ENGAGEMENT IMPLEMENTATION

The Stakeholder Engagement Action Plan (Action Plan) is based on an evaluation of the stakeholder engagement programme to date. The Action Plan identifies target groups and the specific range of engagement activities required for each group. It also addresses outstanding Obligations Under 5 Agreements with Communities



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The Action Plan will be reviewed regularly, at least annually during operations, to ensure that it remains valid and meets the needs of NLGM, local communities and other relevant stakeholders as identified in this SEP. Stakeholder engagement is an ongoing activity throughout planning, construction, operations and closure. The following tables summarise key planned stakeholder engagement during the implementation of outstanding social obligations to the affected communities.

The following table summarises key planned stakeholder engagement during the current phase of the mine's operation.



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Table 15: Stakeholder Engagement Action Plan

ID	Stakeholder Groups Targeted	Purpose	Tasks/Methods	Schedule or Frequency	Responsible
SEP-1	Directly affected communities Local government Local business	Information sharing <ul style="list-style-type: none"> Purpose and nature of outstanding community project commitments Early notification of community construction project starting date, schedule, and duration for: schools, clinic, mosque, hand pumps, and roads, police barrack/dorm; Closure options and impacts on the local communities 	Monthly Community Meetings Focus group Meetings Media Open door event Newsletter Radio	Monthly / when needed	CR
SEP2	Directly affected communities Contractors Employees (economic displaced)	Introduction of grievance mechanism <ul style="list-style-type: none"> Training on Grievance Procedure Grievance Resolution Process (including in response to safety, security during construction period or road contractor issues) Provide training on Company policies (employees and contractors) on respectful and appropriate behaviours with communities Periodic monitoring of project implementation with communities. Grievance resolution and monitoring of agreed compensation measures 	Training on Grievance register Use of suggestion boxes Mails and calls Radio	When Needed / When Requested	CR
SEP3	Directly affected communities Government NGOs Local businesses	Community development <ul style="list-style-type: none"> Identification and prioritization of outstanding project commitments: <ul style="list-style-type: none"> Annual lease payment 16KM road upgrade (Kinjor – Jenne-Brown) Resumption of scholarship program – Drablo Clan Construction of schools (Kinjor & Darblo Clan), Kinjor Police barrack & dormitory; clinic in Darblo Clan; hand pumps & toilet blocks in Darblo Clan, 3 waste pits in Kinjor; and establishment of Radio New Liberty. Assessment of available and required resources Formation of partnerships with directly affected people and business 	Workshops Survey Monthly Community Meetings Meetings with NGOs Radio	When Needed / When Requested	CR



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SEP4	Directly affected communities Local government Local business Contractors	Recruitment and Procurement <ul style="list-style-type: none"> Recruitment of employees Training of staff Procurement of supplies and services from directly affected communities Design of Capacity development program for local people through targeted training programs internally and with key external training partners 	Information leaflet (policies and strategies) Monthly Community Meetings Media releases Radio	When Needed / When Requested During construction	Project Team, CR, HR, Procurement
SEP5	Directly affected communities Contractors Employees (economic displaced) Local government	Restoration of Livelihood activities through inclusive growth opportunities from the mine's operations <ul style="list-style-type: none"> Encourage wealth sharing by sourcing local suppliers/sub-contractors from directly affected communities to strengthen mine's social license Promotion of PAP's shareholding in sub-contracting services to strengthen mine's social license Encourage compliance with MDA as a means of restoring livelihood activities to PAPs, through Training of Liberians: Article 13.3; Secondment: Article 13.2; Article 13.4b; Reporting Regime and Use of Liberian Services and Materials: Article 14 a, Article 14 b, Article 14 c, Article 14 d to strengthen mine's social license 	Information leaflet (policies and strategies) Radio		CR
SEP6	Directly affected communities Contractors Suppliers Relevant regulatory agencies of GoL	Employment and procurement based on MDA & NLGM policies <ul style="list-style-type: none"> Recruitment of employees Procurement of supplies and services Training of unskilled residents on MDA Article 13.3; Secondment: Article 13.2; Article 13.4b. 	Monthly Community Meetings Leaflets Media Radio	When Needed / When Requested Monthly	Project Team, CR, HR, Procurement
SEP7	Directly affected communities	Cyanide code compliance / emergency preparedness <ul style="list-style-type: none"> Develop appropriate emergency response strategies and capabilities with potentially affected stakeholders Engage in public consultation and disclosure about issues of concern with potentially affected stakeholders Ongoing stakeholder engagement with communities	Workshops Survey Six monthly Community Meetings Meetings with NGOs Posters & Radio	When Needed / When Requested Six Monthly	EPA/CR/SHEQ
SEP8	Local communities Local government Emergency services (fire services, police, ambulance services)	Emergency preparedness and response for the community <ul style="list-style-type: none"> Cooperate with local or governmental emergency preparedness and response providers for the community. 	Monthly Community Relations meetings Leaflets Workshops	When Needed / When Requested Monthly	CR/ENV/Safety



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	NGOs				
SEP9	Local communities Government officials	On-going information sharing <ul style="list-style-type: none"> Project activities Social, environmental and health management and monitoring plans Closure options and impacts on the local communities 	Monthly Community Meetings Women Meetings Focus group Meetings Media Open door event Newsletter	Monthly / when needed Six-monthly	CR
SEP10	Local communities Contractors Employees	Comments and grievance mechanism <ul style="list-style-type: none"> Training on Grievance Procedure Grievance Resolution Process 	Grievance register Interviews Suggestion boxes Mails and calls	Monthly / when needed Six-monthly	CR
SEP11	Vulnerable People Directly affected communities	Population dynamics <ul style="list-style-type: none"> Work with PAPs to support vulnerable people through community development programs 	Key informant interviews Meetings with Directly affected communities	As requested / when needed, At least every six months	CR
SEP12	Directly affected communities GoL NGOs Local businesses Local social services	Community development initiatives <ul style="list-style-type: none"> Identification and prioritization of community needs Assessment of available and required resources Formation of partnerships with government and community groups 	Workshops Survey Monthly Community Meetings Meetings with NGOs Radio Media	When Needed / When Requested Monthly	CR
SEP13	Sinje Health Centre / clinics / educators Media Communities	Public health <ul style="list-style-type: none"> Road safety awareness training in neighbourhoods, targeting vulnerable groups such as children, including on safe crossing of the bypass and access roads Notification to public on general types, number and frequency of vehicles that can be anticipated through different phases of the Project Identify opportunities to support local public health campaigns that focus on prevention of communicable diseases and STIs Provide education awareness raising on healthy lifestyles focusing on: alcohol, personal and food hygiene, communicable diseases (including STDs, sexual and reproductive health) and non-communicable diseases; minimising risky behaviours and seeking treatment if required. 	Workshops Survey Six monthly Community Meetings Meetings with NGOs Posters Radio	When Needed / When Requested Six Monthly	CR



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SEP14	Artisanal miners and land owners Local community members Workforce	Biodiversity management <ul style="list-style-type: none"> • Discuss and monitor any restrictions to farming lands and mechanisms to ensure that grazier livelihoods are not adversely impacted that may be required for biodiversity offsets • Discuss and monitor forestry management issues, related to the protection and enhancement of Oak forest through transplantation and tree preservation • Discuss road kill prevention, particularly related to the Daniels Town and Kinjor to Ndablama roads, and implementation of speed limits and training of workers and local land users • Training employees and contractors in NLGM approach of no hunting and trees cutting within ESIA Permitted Area 	Workshops Individual and community meetings Focus group discussions Meetings with relevant NGO and CBOs Radio	When needed to support offset planning	EPA/CR
SEP15	PAP	Social investment <ul style="list-style-type: none"> • Capacity building & technical assistance (TA) in agriculture & related areas as key sectors to sustain & improve traditional livelihoods as a source of income and wellbeing. • Support for the establishment of local organisations (e.g. Cooperatives, Associations, etc.) • Provision of technical assistance to support development of small & medium size businesses (SMEs) Skills training and vocational learning related to agriculture and livestock 	Workshop, training	When needed to support livelihood	

9.1 Tools & Methods for Information Disclosure

CGRT will develop disclosure materials that are clear, consistent and provided in a timely manner to local communities and other stakeholders. Prior to any disclosure, CGRT will conduct pre-disclosure planning to define a process for information disclosure that ensures that all key groups within Communities of Interest are given the opportunity to receive and comment on Project information. This

9.1.1 Internet/Website

CGRT will establish a website and assign a staff to regularly update its content with relevant project information. This website will also carry information on the ESIA along with contact details for the CGRT staff.

9.1.2 BMMC Newsletter

The BMMC Newsletter on key project issues and CGRT's approaches to minimise, mitigate and manage will be prepared and made available on the Avesoro website, in the Town Chief's office in Kinjor and copies will be provided to local village chief offices in our directly affected communities.

9.1.3 Public Media / Radio

As appropriate, relevant project information will also be provided through public media, in particular radio, which is frequently used by the PAPs in directly affected communities. This will be undertaken during all engagement period of the project and will also occur if any major changes to the Project are envisaged, which may impact local communities or land uses.

9.1.4 Responding to Local People

In addition to the Grievance Procedure implemented by CGRD for specific issues, the CGRT will respond to comments and questions from local residents in a full and timely manner. All of such public requests and response to them will be recorded in the ShEDS.

9.1.5 During Project Expansion and ESIA Development

CGRT has adapted a general approach to the consultation process and information disclosure, which is applicable to all phases of the mine's life cycle, whether during ESIA activities or project implementation. For example, the approach to new site entry, such as the Ndablama project expansion will be the same for the ongoing project implementation in Kinjor. Disclosure and consultation on the ESIA and Management Plan for SE will ensure that the affected parties are fully aware of the environmental and social impacts that may affect them and the mine's commitments towards minimizing and managing such impacts. Disclosure and consultation will also allow other interested parties to see the ESIA documentation and make comments on the content and receive feedback from the project in terms of comments received.

General engagement activities include the following:

- Consultation events and opportunities will be widely and proactively publicized, especially among project affected parties, at least 1 week prior to any meeting.
- The non-technical summary is accessible prior to any event to ensure that people are informed of the assessment content and conclusions in advance of the meeting.

- The location and timing of any meeting will be designed to maximize accessibility to project affected stakeholders.
-
- Information presented will be clear and non-technical and will be presented in the local language understood by those in the communities via radio.
- Facilitation will be provided to ensure that stakeholders are able to raise their concerns.
- Issues raised are answered at the meeting or actively followed up.
- Reporting and Evaluation
 - The RAP team will maintain a ShEDS that encompasses minutes and lists of engagements that have been undertaken; letters sent and received; verbal communications and communication materials distributed throughout the resettlement planning process.
 - The ShEDS will also be used to record and track the grievance mechanism described in the previous section. The ShEDS will continue to be maintained throughout the resettlement implementation, monitoring and evaluation phases.

10 GRIEVANCE MECHANISM

In compliance with IFC PS5, NLGM established a grievance procedure and mechanism to ensure that affected parties have the opportunity to express complaints and concerns with regards to resettlement activities, compensation and restoration of livelihoods.

The SEP Grievance Procedure is not a replacement of existing legal processes available to the affected parties and will not infringe on claimants' right to access existing legal procedures.

The Project will maintain an accessible Community Grievance Mechanism to provide prompt and effective redress for those who have been adversely impacted by Project activities. It will seek to resolve issues promptly and fairly to expedite the receipt of entitlements and assistance, without resorting to expensive and time-consuming legal actions. The Grievance Procedure will be in place at least until such time that a RAP Completion Audit has been done.

10.1 Scope

NLGM seeks to build strong relationships with stakeholders and to manage the impact of its business activities on affected communities. Nevertheless, it recognizes that complaints about its activities may occur from time to time.

NLGM has developed a grievance mechanism to receive complaints from individuals, groups, and organizations. It applies to complaints arising due to actions (or lack of action) of BMMC's project and/or its contractors.

The mechanism will be periodically reviewed and revised based on experience gained during its implementation. The terms 'complaint' and 'grievance' are used interchangeably for the purposes of the mechanism.

10.2 Purpose and Objectives

The goal of the Community Grievance Mechanism is to receive, assess, fairly and promptly respond and effectively resolve grievances.

The mechanism will be revised and updated periodically based on experience and feedback from stakeholders.

The Grievance Mechanism has the following objectives:

- To promote awareness of ways to make a complaint amongst affected stakeholders.
- To establish a prompt, consistent and respectful mechanism for receiving, investigating and responding to Complaints from community stakeholders;
- To provide affected stakeholders with access to a fair and transparent mechanism for making a complaint and obtaining redress or seeking resolution of any dispute that may arise due to Project activities, without cost or fear of reprisal.
- To endeavour to reach agreement with complainants on appropriate and mutually acceptable remedial actions collaboratively, using dialogue and negotiation.
- To promptly implement agreed remedial actions to minimize adverse impacts and prevent complaints escalating.
- To acknowledge receipt and keep the parties of any complainant informed about progress towards resolving it.
- To ensure that complaints are properly registered, tracked and documented, with due regard for confidentiality.
- To monitor trends and patterns in complaints as a tool for assessing the effectiveness of Project environmental and social management plans and, where warranted, to initiate improvements.

The Grievance Mechanism is not intended to prejudice a complainant's recourse to outside judicial or administrative remedies at any time.

10.3 Grievance Management Process

This section briefly describes the process that will be followed when a complaint regarding the Project's activities is received, timeframes for responding and resolving the issue and possible avenues for third party dispute resolution.

10.3.1 Publicizing the Grievance Mechanism

The Grievance Mechanism and ways of making a complaint will be widely publicised within the Project area during community engagement associated with the resettlement planning, as part of on-going formal and informal stakeholder engagements. Information about where complaints can be logged will be incorporated into all compensation and resettlement agreements. Information will also be placed on public notice boards and communicated verbally at community and public meetings.

10.3.2 Making a Complaint

Complaints may be made in person or through a trusted representative. Complaints may be submitted verbally (face-to-face, by phone) or in writing (letter, SMS, e-mail) through attending a Resettlement Committee Meeting or directly with the Project offices, the local administration or with the Stakeholder Engagement Team. Community boxes have been installed in the project affected communities as another way to post complaints and to listen to the concerns of the PAPs. These will be collected weekly.

10.3.3 Grievance Management Steps

The grievance management process is illustrated in Figure 3 and has five steps:

1. Receiving, registering and acknowledging receipt of a complaint
2. Investigating, verifying and determining resolution options.

3. Agreeing resolution actions with the complainant.
4. Implementing the agreed remedial action.
5. Verifying the outcome with the complainant

Many members of host and affected communities are not able to read or write, consequently, particular attention will be paid to having face-to-face dialogue and direct interaction with complainants to ensure that processes, decisions, and outcomes are thoroughly understood. For complex matters, or where the parties are otherwise unable to reach agreement on an acceptable resolution, the Project and the complainant may mutually agree to proceed to a third-party dispute resolution process.

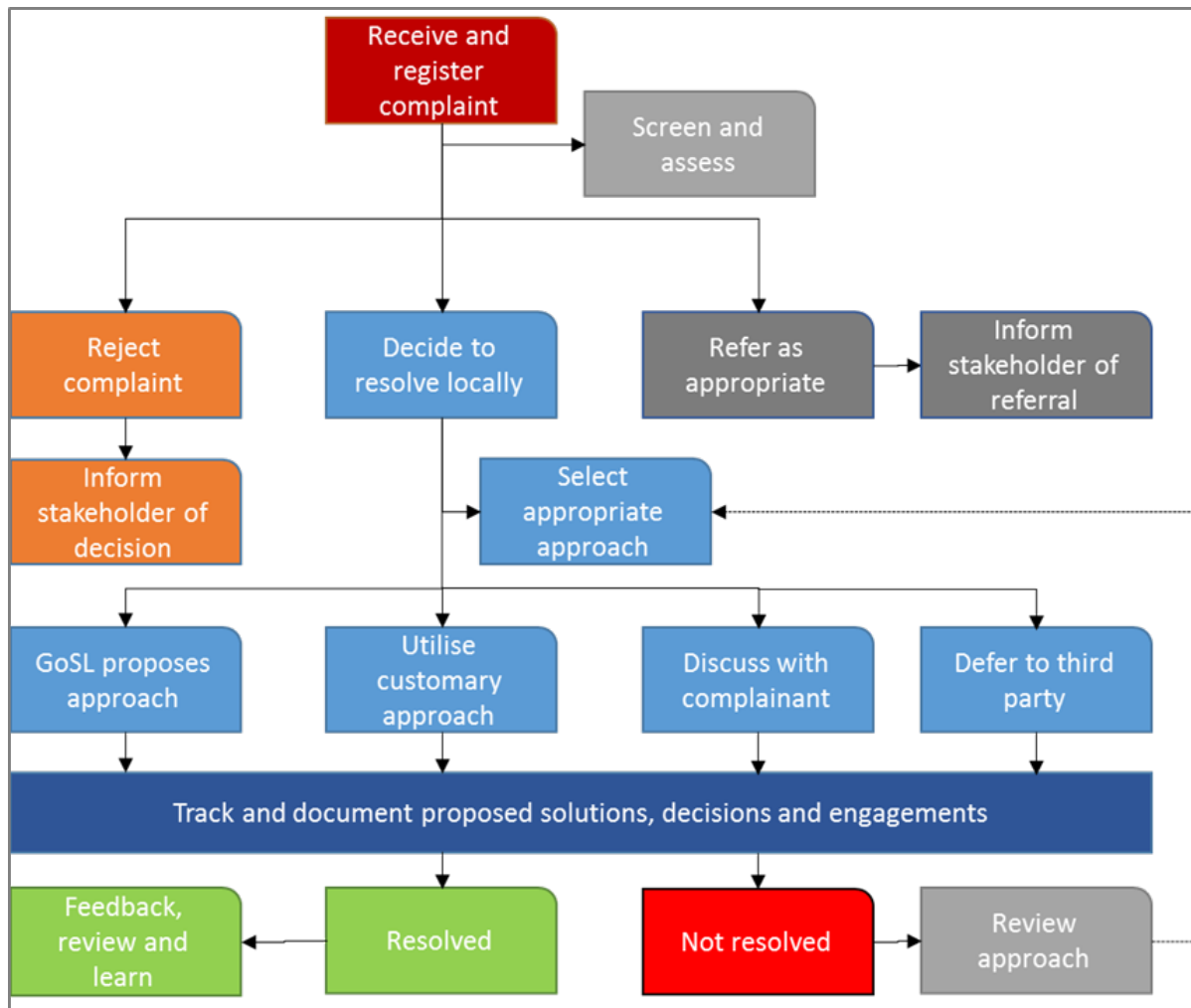


Figure 3: The Grievance Management Steps

10.3.4 Timeframes

Prompt redress is important for ensuring that complaints are not escalated. So far as feasible, the Project will endeavour to process complaints within a defined timeframe as detailed in Table 19: Processing timeframe matrix.

These timeframes should be regarded as a maximum as some complaints will require immediate/urgent attention. Consequently, these are proposed timeframes that will be reviewed and categorised during the resettlement planning process.

The ShEDS Analyst is responsible for providing regular feedback to the Complainant. This includes providing feedback to acknowledge the receipt of the grievance, feedback as to how the grievance will be investigated (rejected, deferred or resolved) and feedback when verifying the outcome. If additional time is needed to complete an investigation, the ShEDS analyst will inform the Complainant of the reason for the delay.

Table 19: Processing timeframe matrix

Process step	Targeted completion	Responsible Person
Acknowledgement of receipt	Within 7 days of the complaint being received	CGRM
Investigation outcome	Within 15 days of the complaint being received.	CGRM and NLGM Management Team
Implementation of remedial action and close-out	Within 30 days of complaint being received.	CGRM and Community Relations Team

Some complaints, such as those related to rights to land and compensation, may require inputs from the dedicated Resettlement Committee structures. These bodies may take some time to convene or mobilise.

When delays appear likely, the Project will keep complainants regularly updated of progress and likely timeframes for resolving their complaint whilst working with the relevant entity to resolve the complaint.

10.3.5 Third Party Dispute Resolution

For complex matters, or where the parties are otherwise unable to agree on an acceptable resolution, the Project and the complainant may mutually agree to negotiation facilitated by a neutral third party.

Where not statutorily defined, the choice of neutral third party will be dependent on the nature of dispute. The role might variously be filled by a mediation professional or organisation, a national expert, an NGO, an academic, lawyer or other respected local, national or international figure. Findings will be non-binding to either party and they will not preclude either party pursuing legal action.

10.4 Reporting and Documentation

The Project has established a database for registering and tracking all engagements including the resolution of complaints. This will capture the following information for each complaint received:

- unique complaint number;
- date of complaint;
- name of complainant;
- complainant address (or GPS coordinates) and contact details;
- name of person receiving the complaint;
- description of the complaint;
- date of acknowledgement;
- date of investigation;
- investigation outcome;
- agreed remedial action;

- remedial action implementing responsibility;
- remedial action targeted completion date;
- actual date of completion;
- outcome;
- person verifying the outcome; and
- close-out date.

The database will be designed to support production of monitoring reports with summary metrics so that the RAP team as well as the technical committee are made aware of any issues that could potentially affect the implementation of the Project and the resettlement process.

The RAP team will maintain the database until completion of the preparation of the RAP and will provide regular, publicly disclosable updates on community consultation and engagement activities and findings.

ENG00479	Access to electricity	Letter	Corporate	23-Mar-17	4
The gentleman concerned has reported that his electricity has been cutoff due recent company work near his village.					
Stakeholders					
	STK00041)	Deputy chief/secretary,			
	(STK00036)	ESIA Coordinator,			
Documents					
040915 - Meeting with village chief of Tchies Initial site visit - Tchiessa					
ACT00271	Follow Up	(STK00036)	23/03/2017	26/03/2017	Closed Resolved
Registration					
ACT00272	Follow Up	(STK00036)	24/03/2017	26/03/2017	Closed Resolved
Assessment					
ACT00273	Follow Up	(STK00036)	25/03/2017	26/03/2017	Closed Resolved
Acknowledgement					

Figure 4: Sample Grievance Sheet

11 SEP MANAGEMENT

11.1 Community and Government Relations Team (CGRT)

The Community and Government Relations Department will manage the SEP. The Department will be the direct contact between the RAP and its beneficiaries, including all other stakeholder groups. CGRT serves as the Stakeholder Engagement Team. The Team is headed by a Manager and staff as follow: two officers - Community Development Officer, Public Relations Officer, ShEDS Analyst, and five Community Liaison Assistants. The CGRT also includes representatives from the directly affected communities to ensure coordinated technical oversight and their inclusion in decision making processes that affect them.

The Community and Government Relations Manager will work closely with the directly affected people, including the Resettlement Committee (RC) of Kinjor Village to coordinate all stakeholder and community engagements in the affected communities.

The CGRT will act as a typical Resettlement Advisory/Oversight Committee (RAC). The CGRT will engage with key stakeholders such as national government, local government and paramount chiefs, as well as section and possibly affected village chiefs, as and when the project necessitates on matters including the following:

- all matters related to resettlement (including legislative and procedural);

- advice and guidance at key stages of the Project;
- ensure that affected community projects are implemented on schedule;
- ensure regularly that stakeholder engagement meetings are held on schedule, and information are shared during meetings on project status;
- ensure that the RAP and its implementation are fair and sustainable;
- ensure that the principles guiding the RAP are followed;
- ensure that the RAP and its implementation are in line with Liberian law and good practice; and
- ensure that the criteria encompassed within the IFC's Performance Standards are achieved.

Each affected community will be appointed a Community Liaison Assistant who will provide advise/support and receive grievances. This office will also serve as a project information centre. All liaison officers are employed on a part-time basis.

The Organizational structure and management functions for the SE function at NLGM is described below for the successful implementation of the SEP:

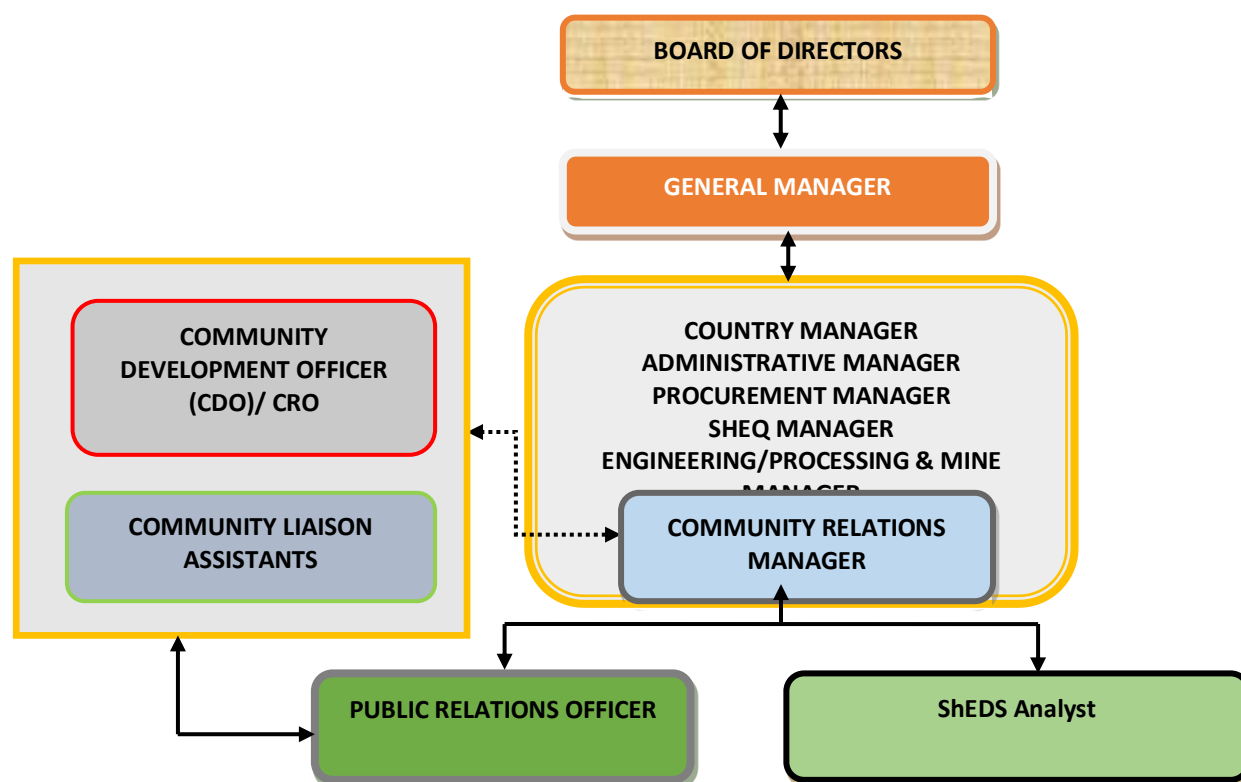


Figure 2: SEP implementation organogram

Table 16: Key roles and responsibilities for SEP implementation

Role	Responsibilities
General Manager	<ul style="list-style-type: none"> • Approval of this Plan and resources required for implementation.
Community and Government Relations Manager	<ul style="list-style-type: none"> • Responsible for overseeing and coordinating all activities associated with stakeholder engagement;

	<ul style="list-style-type: none"> • Lead design, management, implementation & evaluation efforts for Community Development Projects; • Timely implementation of this Plan, including coordination with implementing organisations and other stakeholders; • Ensuring Project compliance with the Project Standards and other requirements set out in this Plan; • Development, monitoring and revision of this Plan; • Monitor project implementation (assessments, evaluations, CDPs, etc.) through site visits, regular meetings with stakeholders; as needed, adjust program/evaluation scopes to improve performance, establish a timeline for program evaluation; • Oversee all activities that are planned or being implemented for SE; • Ensure that all aspects relating to SE are kept on the management agenda and addressed; • Reports directly to the General Manager and is able to interact freely with key decision-makers in the Organization i.e., Administrative Manager, SHEQ Manager, Engineering Manager, and all other managers; • Develop, implement and monitor all SE strategies / plans for NLGM; • Oversee all SE related activities for NLGM (administration, CLA); • Manage the grievance process; • Interact with and support projects that require ad-hoc or intensive SE (CDP and RAP); • Act as mediator between NLGM and stakeholders (communities, Government structures, Traditional structures, NGOs, CBOs, commerce and industry and international Organizations); • Integrate with other Organizational managers to ensure that SE requirements /protocols are understood; and Proactively identify stakeholders, project risks and opportunities and inform the General Manager / management to ensure that the needed planning can be done to mitigate or capitalise; • Facilitates the interaction with other departments, initiatives or projects;
Community Development Officer	<ul style="list-style-type: none"> • Stakeholder engagement & interaction with affected communities (Community Liaison Assistants (CLA), information meetings, public hearings, etc.) • Outreach and communication - assist organizing and administering surveys and studies: questionnaire, data collection and capture, field work coordination • oversee performance of CLA; • work with village chiefs to promote project-related information sharing, collection of data (for example, on vulnerable groups); • oversee community development programs being implemented; and

	<ul style="list-style-type: none"> Logging all records of engagements in ShEDS
Public Relations Officer	<ul style="list-style-type: none"> Create a positive awareness on the operations of Bea Mountain Mining Company (BMCC) in Cape Mount county and other parts of Liberia; Help the community to understand the company business and address misunderstandings; Promote the image of the company in the affected communities and strengthen peaceful co-existence; Create awareness on ongoing activities of BMCC to ensure that the company has a strong public acceptance in the affected communities; Assist with the conduct of focus group discussions with the community and key stake-holders, and also conduct conflict management workshop within concessional areas; Publish BMMC's newsletter quarterly; Establish and manage the proposed "Radio New Liberty" Assist with printing of materials to be used during stakeholder meetings (posters, pamphlets, BIDs, letters, attendance registers, maps, newsletters).
Community Liaison Assistants	<ul style="list-style-type: none"> Responsible for implementing community engagement activities; Engage with communities at grassroots level on a continuous basis in an effort to strengthen relationships between NLGM and communities / traditional structures; Provide feedback to the Social Manager on concerns raised by the community /traditional structures; Provide feedback to the community / traditional structures on project developments, concerns raised, or important decisions taken by the NLGM; Identify potential grievances or project risks / opportunities; Assist CGRT Manager with facilitation of grievances lodged; Assist the HR Manager during the recruitment process by soliciting community requirements; Identify community needs for social development or engagement requirements; and SE logistics (gather suggestions / grievances from suggestion boxes, delivery of letters to traditional authorities, put up communication materials on notice boards, arrange community meetings etc.).
ShEDS Analyst	<p>Document management:</p> <ul style="list-style-type: none"> Capture and file (physical and electronic) of SE document / records, including: grievance records, attendance registers, letters, post, emails notes, suggestions, complaints, memos, statements, photos, reports, strategies and plans, agreements, surveys, notification materials, maps, print materials, adverts, articles. <p>Database management:</p>

	<ul style="list-style-type: none"> responsible to manage all activities related to ShEDS, documents and SE logistics; Track, update ShEDS, the grievance data base, follow-up actions; Continuously update stakeholder information (contact details, Organizational details, designation, engagement activities); Monitor and report on CR compliance with SRK'S recommendations and community obligations under 5 agreements, including MDA, Land Sale, Land Lease, CDP, and RAP; and Continuously update grievance information according to the steps set out in Grievance Management (grievance records, grievance log, agreements, meeting registers). <p>Logistics management:</p> <ul style="list-style-type: none"> Support with arranging accommodation and traveling where required.
Resettlement Committee	<ul style="list-style-type: none"> Engage resettlement-affected individuals, groups and communities; Advise NLGM on the fair resettlement and distribution of benefits to directly affected people; and Represent directly affected residents of Kinjor, Larjor, and the Marvoh Land owners.

Key Interfaces

Key interfaces in the implementation of this Management Plan (i.e. roles with responsibility for delivering elements of this Management Plan) include:

- Human Resources:** opportunities for employment and training are key concerns for community members. They are also very sensitive about appointing people from the affected villages or communities as opposed to communities or villages located further away from the project site. This requires that a defined process of employment be developed and clearly communicated to community leadership and members.
- Camp Manager:** The Camp Manager is often responsible for logistics, which include transport to and from villages. These transport arrangements need to be supported by the Site Manager and arranged accordingly in cases where extensive consultation with communities are required.
- SHEQ Manager:** how the mine interacts with the environment will have a direct bearing on stakeholder's perceptions. The SHEQ Manager needs to be able to interact with the EPA / FDA or environmental NGOs freely, providing the needed information on the mine's environmental policies and how they are being implemented.
- Processing Plant and Engineering Manager:** these managers are more than often driven by mine production targets and would need to be capacitated to understand the importance of healthy stakeholder relations, even if it requires production stoppages due to outstanding issues to be resolved around environmental or social impacts, for example.
- Geology Department,** particularly in relations to pre-community entry/SEP during exploration/drilling, including employment from the community;

- Construction Manager, particularly in relation to the associated stakeholder engagement during construction and employment from the community;
- Mine Manager, particularly in relation to roads maintenance works and the associated stakeholder engagement during hiring from the community;
- Technical Services Manager in relations to the associated stakeholder engagements plan management;
- Security, particularly in relation to engagement with community members in all operations of the mine;
- Procurement, particularly in relation to securing local suppliers of goods and services from the community;
- Project Linkage, particular in relation to linking the locals to opportunities offered by the project; and etc.

11.2 Training

All necessary training is provided as part of induction training (to provide general awareness) and job-specific training as necessary.

11.2.1 Induction Training Stakeholder Engagement Plan

All employees of NLGM and contractors are required to participate in community relations and human rights training as part of the standard induction programme. This training is designed to help Turkish and foreign workers on the ONLGM Project understand and respect different cultures and points of view and operate effectively as team members, as well as and behave appropriately when they are within local communities.

11.2.2 Job-Specific Training

Specific training on stakeholder engagement and the application of the Grievance Procedure will be provided to Community Relations Officers and other personnel and Head of Departments of the NLGM and contractors involved in or overseeing activities with local communities.

11.2.3 Other Training Requirements

Additional specialist training shall be provided to key personnel involved in community and stakeholder engagement on an “as needed” basis.

11.3 Local Employment and Training

The Mineral Development Agreement (MDA) and NLGM Local Employment and Training Policy commit's the project to implement opportunities for local employment and ensure a fair distribution of employment opportunities in the communities located near and impacted by the Project. This is vital for establishing a good relationship between the company and citizens in the local communities, thereby securing from them the necessary social license to operate.

By implementing this plan, NLGM will also apply good international industry practices and Labour and Working Conditions), which require that the company:

- Establish, maintain, and improve worker-management relationships,

- Promote fair treatment, non-discrimination, and equal opportunity for workers, and compliance with national labour and employment laws,
- Protect the workforce by promoting safe and healthy working conditions,
- Uphold safe and healthy working condition and protect and promote the health of workers.

Further, this plan also aligns with all Liberian Labour laws and other related laws and regulations and will ensure compliance with these.

Communities directly affected by the current activities of the company will have priority access to local employment opportunities, followed by workers from other districts in Cape Mount County, excluding the Darblo Clan, and then workers from other counties and places, in which the Project is located. Directly affected people will always be given priority over everyone else. Others will only be used where directly affected people cannot supply the particular skills and experience needed in the role.

Opportunities for direct employment will be constrained by the availability of proper skills. Taking into consideration the skills limitation within the Project-affected area, the focus of the employment strategy will be employment of the unskilled and semi-skilled workforce. The Project anticipates that:

1. The majority (target of 100%) of the unskilled workforce will come directly from the affected communities;
2. A high proportion of the suitable semi-skilled and skilled applicants from the affected communities will receive priority consideration over applicants from other places, which includes all of Grand Cape Mount county.

Table 17: Community employment distribution:

Category	Directly project affected communities	Other Districts in Cape Mount	Other places	Grand Cape Mount County
Unskilled	70%	30%	0%	100%
Semi-skilled	Competitive vetting, with special treatment reserved for direct project affected communities	Competitive vetting, with special treatment reserved for direct project affected communities	Competitive vetting, no special treatment reserved	Competitive vetting, with special treatment reserved for project affected communities
Skilled	Competitive vetting, with special treatment reserved for direct project affected communities	Competitive vetting, with special treatment reserved for direct project affected communities	Competitive vetting, no special treatment reserved	Competitive vetting, with special treatment reserved for project affected communities

In addition to levels of hiring, the company will prepare a detailed training program for the life cycle of the project with a view to ensuring the development of suitable and qualified Liberian, in particular, project affected people, over time at all levels, so they are better prepared for working at the project site.

Throughout the project life cycle, the mine is committed to develop the following through its recruitment and training practices:

- Improvement of local skills through training in order to maximize local employment and facilitate economic development initiatives that benefit the local community;
- Development and dissemination of international best practices to the project and contractor workforces: this refers to working conditions, health and safety and overall management practices;
- Investment in local businesses, mainly Small and Medium Enterprises (SMEs) to upgrade their ability and increase the amount of goods and services sourced from local communities around the mine; and
- Use of Local Goods and Services as the Company plans to develop a “Supply Chain & Logistics Local Business Initiative Program” in order to provide opportunities for local community business participation with the project’s endeavours.

The Company will give preference to the employment of citizens of the Republic of Liberia as much as possible, with priority consideration reserved for the affected communities.

The following table provides the objectives and targets for the training programs.

Table 18: Community Training Objectives and Targets

OBJECTIVE	INDICATOR	TARGET
<ul style="list-style-type: none"> • To facilitate skills, develop to enable pathways to employment and livelihood restoration for people in affected communities to work with the Project • To raise the skill level of local residents 	<ul style="list-style-type: none"> • # training programs provided to residents of affected communities • training completed vs. training planned • # affected community residents trained for skilled positions 	<ul style="list-style-type: none"> • Twice per year (January) • 100% • Twice per year (June)

NLGM encourages all contractors to apply the same hiring procedures and operate in accordance with the Company’s policies and follow all Liberian Labour Laws.

11.4 NLGM Procurement of Goods and Services Policy and Procedure

The NLGM Procurement of Goods and Services Policy and Procedure commit's the Project and its sub-contractors to implement procurement before and during the operation of the NLGM Project in accordance with the following guidelines:

- To maximize local supply of goods and services in accordance with the defined supplier and contractor during the construction and operation of the NLGM Project.
- To enable local firms to competitively tender for opportunities.
- To give priority to local firms and individuals in the case of suitable price, quality, and capacity for periodic and systematic supply of mine consumables and services.

11.5 Monitoring and Evaluation

11.6 Overview of Monitoring Requirements

The Monitoring measures that are to be implemented during the operations phase to assess compliance with Project Standards is provided below.

In the event that monitoring identified non-conformance with Project Standards, these will be investigated, and appropriate corrective actions identified.

11.7 Key Performance Indicators

The table below summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

Table 20: Performance indicator

Key Performance Indicator	Target	Monitoring Measure
Number of community complaints or grievances	Total number reduced year in a year	Complaint Log-ShEDS
Number complaints resolved within one month	Target of 90%	ShEDS
Reporting back to stakeholders on implementation of the Grievance Procedure	Delivery of regular reports to stakeholders (including Management) on the outcomes of the Grievance Procedure	ShEDS
Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual audit complete Target of 90% of grievances closed out to satisfaction of complainant within one month	Audit report.

Table 21: Key Monitoring Measures

Aspects	Methods	Responsible Parties	Frequency
Community Complaints	<ul style="list-style-type: none"> Management will review Grievance Log/Database, including complaints <i>closed</i> and those <i>unresolved</i> per period (at a minimum monthly but more likely as they occur) to include: number of outstanding complaints and grievances opened in the month; number of complaints and grievances opened in the month and evolution since Project start (graphic presentation); number of complaints grievances closed in the month; and type of grievance. The CR team will provide regular reporting back to the community on the treatment of community grievances (including the type of grievance, how they have been addressed and the outcomes arising). An annual audit will be conducted of the Grievance Procedure. The Mediation Committee will be used to facilitate the implementation and monitoring of the Grievance Procedure. 	CGR Manager	Monthly
Visitors to NLGM Office	Community Relations Officers record visitors to NLGM offices and report in Monthly Department performance report. Include visitor numbers, type of visitor, reason for visit etc.	CGR Manager	Monthly

Community engagement activities	Community Relations Officers record formal and informal engagement with local communities in Stakeholder Management System. This will include interactions with committees and working groups. Summarize in Monthly Department performance report.	CGR Manager	Quarterly
Disclosure materials disseminated	Community relations staff will keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and report to the Community Relations Coordinator per period.	CGR Manager	Quarterly
Feedback to local communities	The CGRT will monitor feedback to local communities by developing and implementing a Community Messaging System and Community Diaries.	CGR Manager	Quarterly

11.8 Audit and Reporting

11.8.1 Auditing

Conformance will be monitored in accordance with management's annual performance reviews. All incidents and non-conformances will be reported as per the NLGM internal requirements.

Contractors will be subject to inspection and audit by NLGM prior to a contractor's initial appointment and then on an annual basis.

Conformance with this plan will be subject to periodic assessment by NLGM corporate audit and assurance programmes and separately by Project Lenders.

11.8.2 Record Keeping

Records of audits, inspections and incidents will be managed in by the ShEDS and in accordance with NLGM procedures.

12 CONCLUSIONS

The first SEP was prepared at the start of the engagement process and has been revised to inform what activities happen, when and for what purpose. This second revision follows the previous and is based on the assumption that this will be updated during the resettlement implementation, which is now happening and will continue to the completion of the RAP. Third and fourth revisions reflect major updates in the implementation of the RAP such as delivery of all the permanent houses to the resettled community.

Additionally, this SEP provides a plan for the RAP feedback consultations to be conducted regularly.

Finally, the SEP will include details of all of the engagements that have been carried out, together with monitoring and reporting requirements for their implementation.

13 REFERENCES

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