

MARAMPA MINES LTD

**ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN - VOLUME
2**

Prepared by CEMMATS Group Ltd.

**(Adapted from previous ESIA's by Tricore Corporation Ltd, and SRK
Ltd.)**

June 2021

1 INTRODUCTION

1.1 Background and Context

CEMMATS Group Ltd. (CEMMATS) has been commissioned by Gerald Group Ltd. (Gerald) to undertake an Environmental and Social Impact Assessment (ESIA) for Marampa Mines Ltd. (“MML” or “the Project”) that meets the requirements of Environment Protection Agency Act No. 11 of 2008. This ESIA report is the documented findings of the ESIA process.

The Project is located near the township of Lunsar, some 125 km northeast of the capital city of Freetown, in the Port Loko district of Sierra Leone, West Africa (**Figure 1-1**). The Project comprises the original mining lease held by SL Mining, the original mining lease held by Marampa Iron Ore Limited (MIOL) and other areas north of this lease. Gerald Group Ltd. owned SL Mining and Cape Lambert Resources Ltd., an Australian domiciled company owned Marampa Iron Ore limited.

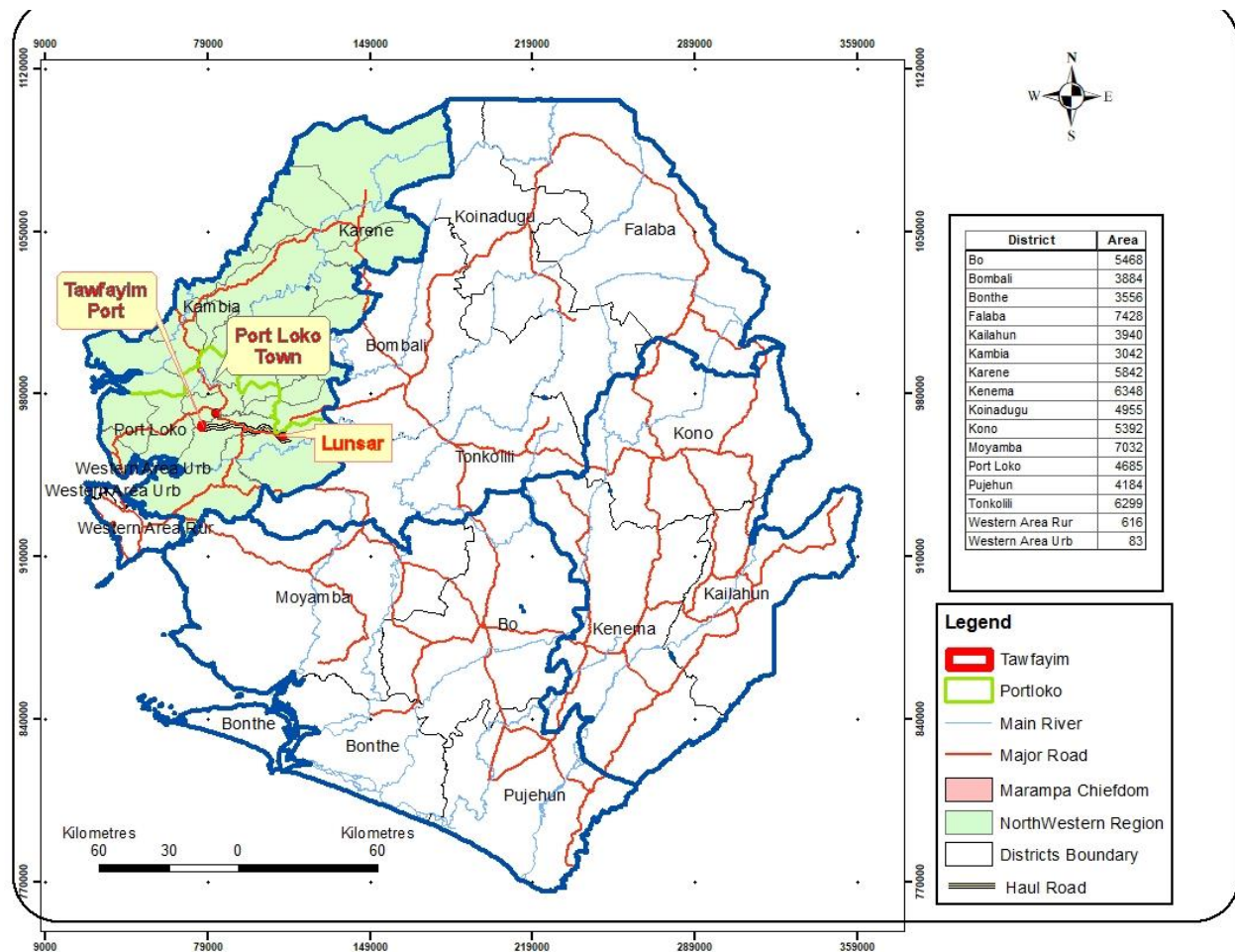


Figure 1-1: Map showing location of project area in Sierra Leone

Tricore Engineering Corporation (Tricore) had carried out ESIA studies in the original SL Mining lease in 2017 (hereinafter referred to as “the Tricore ESIA”) and the area was covered by a valid EIA licence when the mine was shut down and went into care and maintenance in 2019. SRK Ltd.

had also carried out an ESIA study for the MIOL area in 2013 (hereinafter referred to as “ the SRK ESIA” . This ESIA study is consequently an update of these studies as many aspects of the original studies carried out are still germane for the project.

Gerald has performed an initial review to understand the technical aspects for the Project to restart. Initial mining will be in the original SL Mining lease following the mine plan that was in existence when SL Mining shut down. The plan will incorporate the area of MIOL immediately north of the SL Mining lease. The SRK ESIA had covered three specific areas within the MIOL Lease-Area 1 which covered areas planned for placing the plant and tailings deposition areas, Area 2, covering the rich resources immediately North of the SL Mining Lease and Area 3 with three rich resources, south of the SL Mining Lease. For this ESIA, the area of MIOL included in the Project Area of influence is only Area 2 as this is what will be exploited in the short term. The Project Area of influence for this project therefore includes the whole of the original SL Mining Lease including the port of Thofayim, from where the final product is shipped and Area 2 of the original MIOL lease as indicated in **Figure 1-2**.

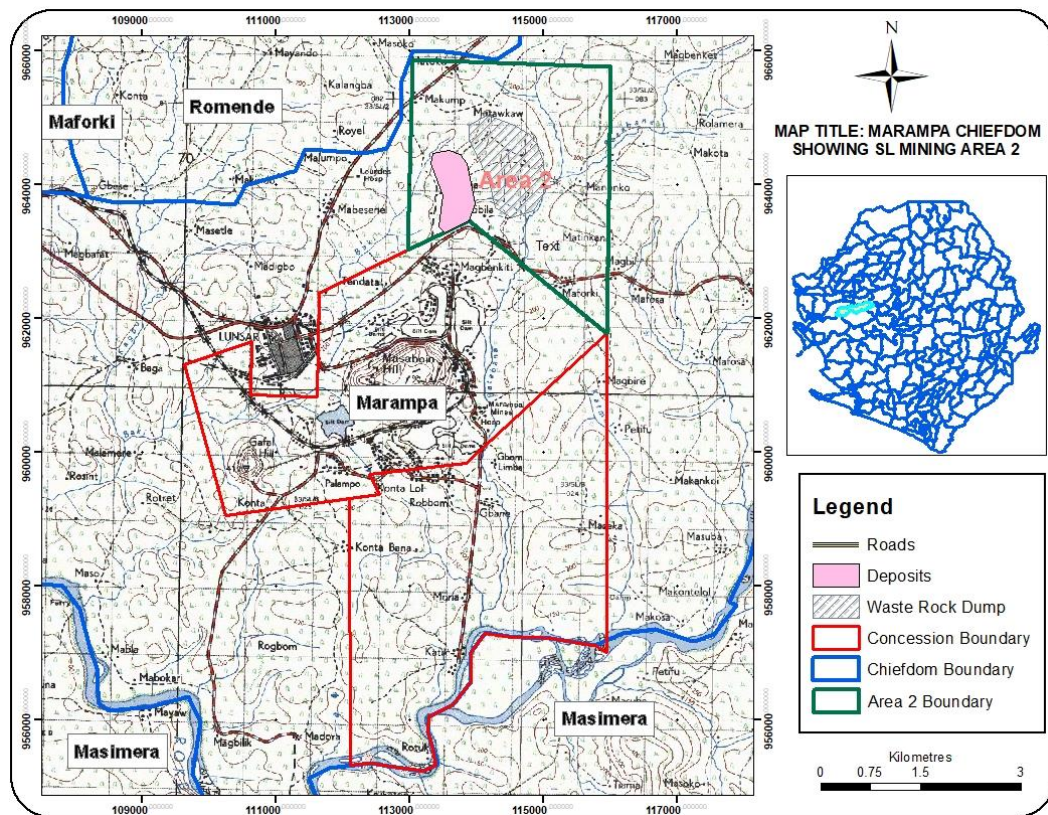


Figure 1-2 Map showing project area of influence for ESIA

This report is on the Community Health and Safety Plan (CHSP) for the MML operation is prepared as part of the Environmental and Soacial Management Plan (ESMP) for this ESIA study.

1.2 Environmental and Social Management Plan

Volume 1 of the Environmental and Social Impact Assessment (ESIA) contains the policy, legal and administrative framework under which the study was carried out and a description of the project in its geographic, ecological, social and temporal context. Mitigation measures needed to control, avoid, prevent, reduce and repair impacts to acceptable levels are presented, as well as an analysis of the cumulative impacts and feasible alternatives.

The Environmental and Social Management Plan (ESMP) outlined in this volume (Volume 2) presents the environmental management, mitigation, monitoring and institutional measures to be taken during project implementation and operation, to reduce adverse environmental and social effects to acceptable levels and enhance positive effects. This plan provides a framework and requirements/guidance for a series of sub-plans to be implemented. It specifically defines what actions must be taken and who is responsible to reduce adverse project impacts. The ESMP highlights the issues and concerns that are presented in the ESIA and identifies reasonable and practical responses to address and mitigate potentially adverse effects. It defines the specific actions that will be required to effectively implement those responses in a timely manner and describes the methods by which management will demonstrate that those requirements have been met. It also establishes the course that the project management will follow in complying with Government of Sierra Leone environmental laws and regulations as well as international policies and guidelines.

This volume has the following parts:

- COMMUNITY DEVELOPMENT ACTION PLAN (CDAP)
- COMMUNITY HEALTH AND SAFETY PLAN (CHSP)
- EMERGENCY RESPONSE PLAN (ERP)
- ENVIRONMENTAL LEGACIES REPORT
- ENVIRONMENTAL MANAGEMENT PLAN (EMP)
- MINE CLOSURE PLAN (MCP)
- RESETTLEMENT POLICY FRAMEWORK (RPF)
- ROAD SAFETY MANAGEMENT PLAN (RSMP)
- SOCIAL MANAGEMENT PLAN (SMP)
- WASTE MANAGEMENT PLAN (WMP)

These are succinctly described below

Environmental Management Plan (EMP)

The Environmental Management Plan identifies the principles, approach, procedures and methods that will be used to control and minimize the adverse environmental impacts of project activities. It is intended to complement the project's Environmental and Social Impact Assessment (ESIA) and ensure that commitments to minimize project related adverse social impacts are upheld throughout all project phases. It is intended that this EMP will serve both as a checklist and framework to effectively manage the implementation of all environmental mitigation actions and

monitoring to meet the requirements of Sierra Leone's environmental legislations and other requisite guidelines.

Social Management Plan (SMP)

The Social Management Plan (SMP) is prepared in accordance with government regulations. It functions as both a framework and checklist to effectively manage the social impacts associated with the Project. The key objective of this SMP is to outline strategies to avoid or where this is not possible, to minimise negative impacts to communities around the project site as well as enhance potentially positive impacts and development opportunities at a local and national level. It is a tool that ensures that social and local economic commitments made to address Project impacts, are properly implemented and monitored throughout the life of the Project.

Resettlement Policy Framework (RPF)

The RPF presents a framework for the development of a specific RAP for project affected people (PAP), who may be displaced or relocated and disrupting their livelihoods due to the involuntary taking of their land. The RPF is a comprehensive plan to address physical and economic displacement of PAP. The RPF specifies the policies to which the Project will adhere to, the procedures that it will follow and the actions that it will take to mitigate adverse impacts, compensate losses and provide development benefits to persons and communities displaced by the Project. The main aim of the RPF is to set out a strategic response to the challenges of involuntary resettlement and/or payment of compensation, which are expected to be a consequence of the activities to be undertaken by the Project.

Community Health and Safety Plan (CHSP)

A Community Health and Safety Plan contains measures to ensure that project-generated health and safety risks to local communities are minimised. It entrenches a preventative approach to community health and safety, and addresses infrastructure and equipment safety, hazardous materials safety, environmental health, communicable diseases, emergency preparedness and response, and the community-oriented responsibilities of security personnel.

Road Safety Management Plan (RSMP)

Road safety precautions must be put in place to help drivers on the road from causing unnecessary accidents and at the same time helping pedestrians and cyclists understand the rules governing their safety on a highway. The plan will highlight the social and economic implications of road traffic crashes, in order to appreciate and drastically reduce road traffic injuries and also help such raise awareness for road safety improvement. It will detail the road safety and traffic management principles, strategies and measures that will be applied, road user requirements including: provision of a safe environment for the travelling public, and minimising impacts on the road network.

Waste Management Plan (WMP)

The Waste Management Plan describes the procedures, systems, equipment, and structures specific to waste management and disposal. Waste generation will be limited at all levels of the operation in order to decrease the volume of waste generated and make waste disposal more

manageable. The plan also defines who is responsible for developing and implementing the plan, and what records and reporting will be required.

Emergency Response Plan (ERP)

The Emergency Response Plan (ERP) provides employees and managers with specific instructions that will allow them to respond quickly and efficiently to any foreseeable emergencies likely to occur with the Project. It is developed using recognized and accepted methods and practices, and includes specific responses, protocols, and management contacts. The ERP essentially has the goal of protecting people, the environment, property and the operations. This document deals with typical emergency types that characterize the operation.

Mine Closure Plan (MCP)

The Closure Plan documents plans required to stabilize the site, post exploration and mining activities. Reclamation activities are implemented to re-establish a beneficial post-operation land use.

Environmental Monitoring plan

This environmental monitoring plan is the mechanism by the mine shall monitor (and consequently manage) the significant environmental impacts/aspects associated with the project and as identified in the project Environmental and Social Impact Assessment (ESIA). Management, mitigation and monitoring measures are presented in this report, which also includes a comprehensive monitoring plan.

Community Development Action Plan (CDAP)

The CDAP involves the community development and social assistance programmes aimed at improving the living conditions of the local communities in a sustainable way.

Environmental Legacies Report

This report clearly sets out the environmental legacies at the mine. It should not be necessarily assumed that the mine will assume responsibility for any legacy issue left over as a result of previous operation. The objective of the report is to provide information on the status and issues (if any) facing the identified environmental legacies and indicate the extent of these legacy issues.