

SOCIAL MANAGEMENT PLAN

1 INTRODUCTION

This Social Management Plan (SMP) has been prepared for the MML Project, in accordance with the Sierra Leone Government's Eleventh Schedule (*Social Management Plan Standards*) of the Environment Protection (Mines and Minerals) Regulations (2013). This SMP will function 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 MML Project site as well as enhance potentially positive impacts and development opportunities at a local and national level.

This SMP is designed as a tool to ensure that social and local economic commitments made by MML to address Project impacts, are properly implemented and monitored throughout the life of the Project.

The SMP draws on the findings of the MML Project ESIA, including the outcomes from the public participation activities.

1.1 Plan Ownership and Maintenance

The MML Community Relations Manager is responsible for implementation and maintenance of this plan.

As the mine progresses and matures, this SMP will be updated and reissued for use on an annual basis or sooner when:

- Changes or updates to Sierra Leone legislation or regulations occur;
- The project's community or social aspects/impacts profile changes including project expansion, expansion of project footprint or other aspect with the potential for significant impacts on communities; and
- Lessons can be learned from incidents, non-compliances, audits and grievances.

1.2 Structure of SMP

The SMP is organised as follows:

Section 1: Introduction

Section 2: Reference documents

Section **Error! Reference source not found.**: Marampa Mines Limited Operations - Planned

Section 4: Roles and responsibilities

Section 5: Existing management systems

Section 6: Management and monitoring activities

2 REFERENCE DOCUMENTS

A summary of key reference documents is provided here. For further detail, refer to Chapter 3 on Policy, legal, regulatory and administrative framework in the ESIA document.

2.1 National Standards

The following national standards are relevant:

- Mines and Minerals Act 2009;
- Environment Protection (Mines and Minerals) Regulations (2013);
- Operational Regulations for the Minerals Sector (2013);
- Sierra Leone Local Content Policy;
- Merchant Shipping Act (2003);
- Road Traffic Act (2007); and
- National Lands Policy 2016

2.2 MML Agreement

- The distinct documents for the granting of the MML concession area must be referenced. The Mining Lease Agreement is still under negotiation and to be ratified by the Sierra Leone parliament.

2.3 Compliance Hierarchy

The compliance (legal and internal) requirements associated with the activities and operations of MML Mines operational/production activities are defined in a descending hierarchy of order as follows:

1. Compliance requirements imposed by the Sierra Leone 'Regulatory Framework';
2. International conventions to which Sierra Leone is a signatory or with which MML must comply; and
3. MML corporate requirements including those recommended by organisations which MML is a member.

Where there is no specific Sierra Leone environmental legislation coverage, MML may adopt an appropriate industry or international standard.

3 MARAMPA MINES LIMITED OPERATIONS - PLANNED

Gerald has performed an initial review to understand the technical aspects for the Project to restart. Initial mining will be in the original Marampa Mines Limited lease following the mine plan that was in existence when Marampa Mines Limited shut down. The plan will incorporate the area of MIOL immediately north of the Marampa Mines Limited 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 Marampa Mines Limited Lease and Area 3 with three rich resources, south of the Marampa Mines Limited 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 Marampa Mines Limited Lease including the port of Thofeyim, from where the final product is shipped and Area 2 of the original MIOL lease as indicated in Figure 2. The total area for the area of influence for this study in various locations is 38.78 km².

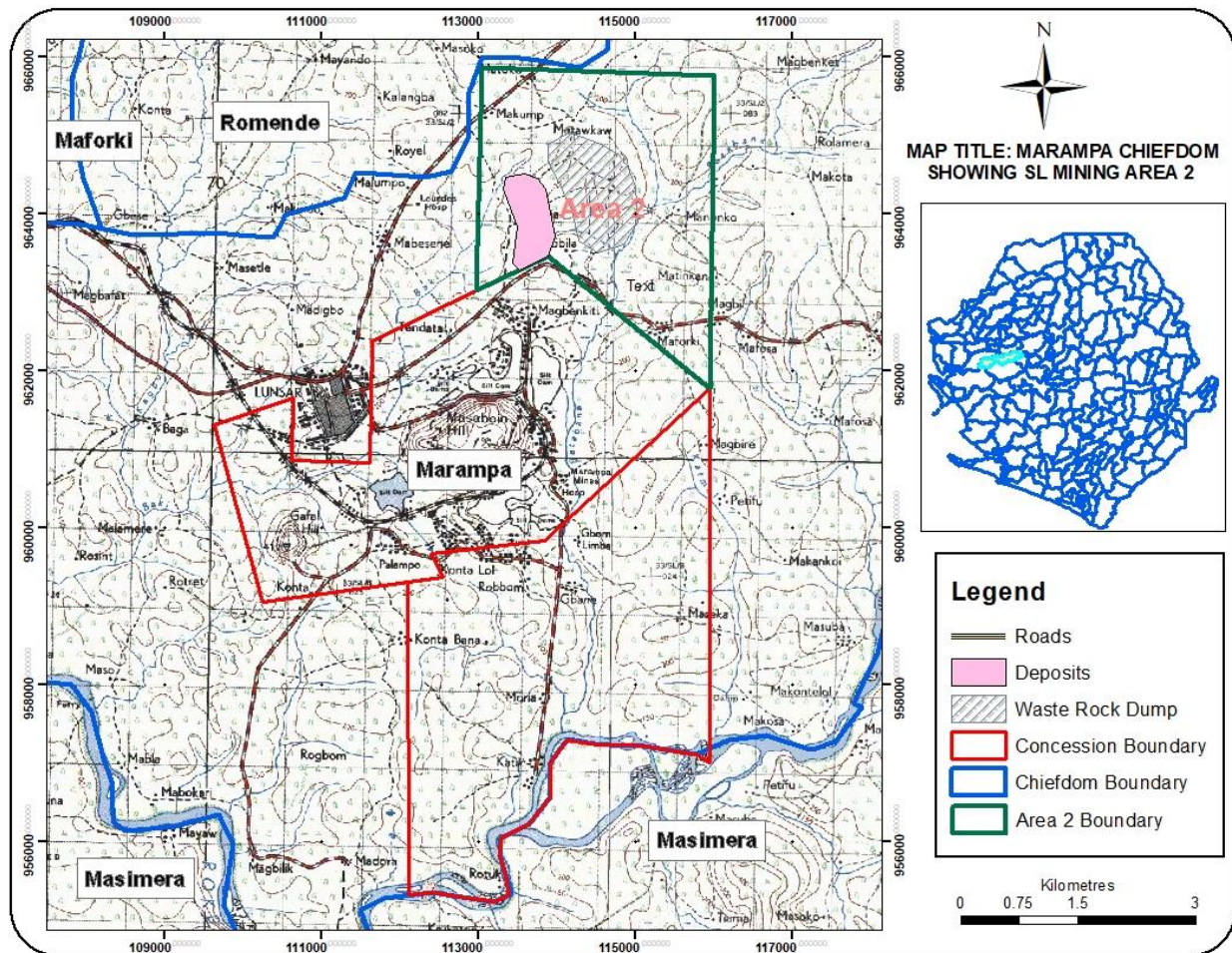


Figure 2: Map showing project area of influence

Key mining and processing requirements at the start of operations include having the Project being able to treat primary ore as well as produce a consistent high grade and clean concentrate product (grading at least 65% Fe). A phased approach, primarily reflecting

changes in ore type available to process, as well as limitations in the infrastructure required to support the Project over time will be used.

Life of Mine (LOM) is expected to be about 30 years over which 430 Mt of ore will be processed. The ore deposit in Area 2 of the MIOL Area will also feature into the mine plan during this period.

MML will use the same export logistics as recent operators of the Marampa Project i.e.:

- 43km haulage road to the Thofayim River Terminal (TRT) on the banks of the Port Loko Creek. TRT is capable of handling the output of the mine with no significant upgrades to barge loading and handling facilities.
- Barging of concentrate from TRT down the Port Loko Creek to a transhipment vessel in the Freetown Port Area. Ore transferred from transhipper to ocean going vessels and overseas market.

The full project description provided is in Chapter 2 of the MML Project ESIA.

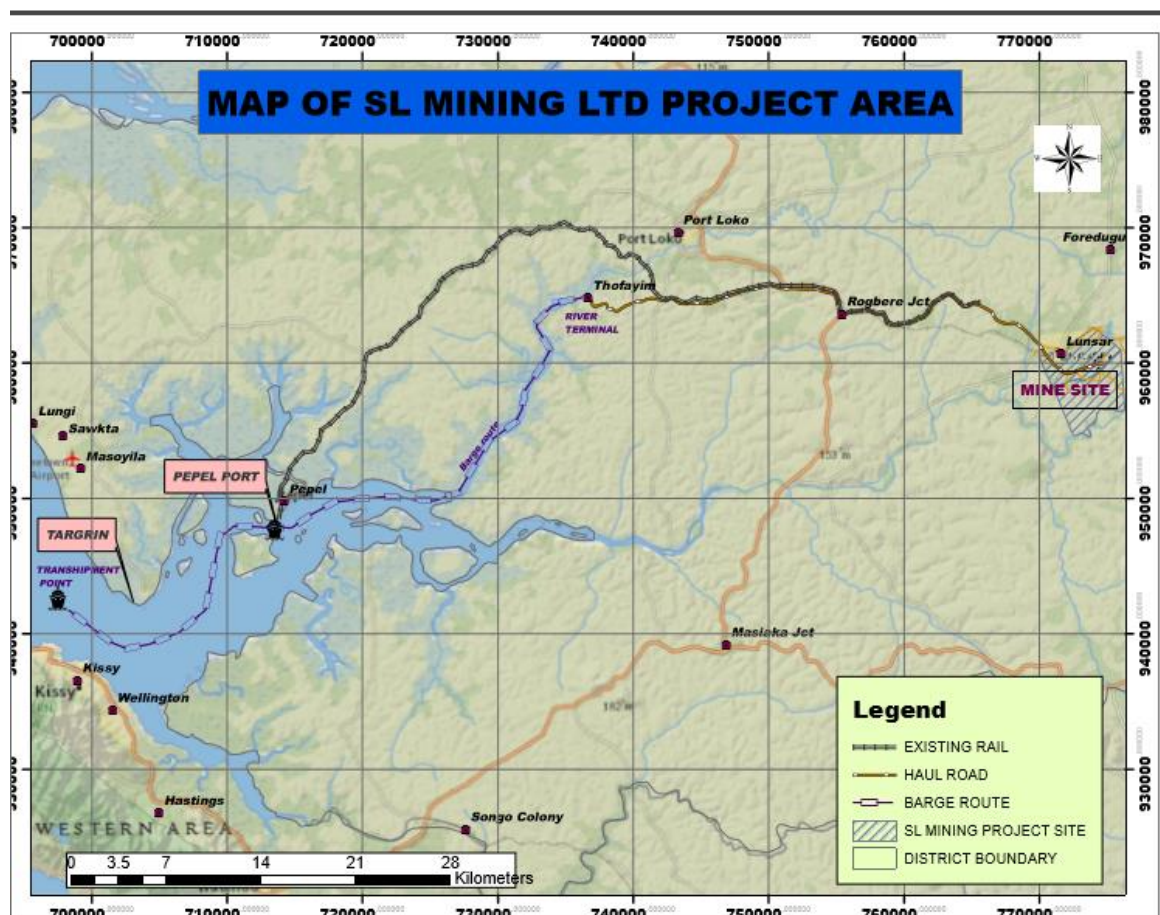


Figure 2: Map of Marampa Mines Limited Project Area

3.1 Overview of Impacts

3.1.1 MINE CONCESSION AREA

The expansion of the MML Mine will bring economic benefits in the form of tax revenues and royalty payments for the national and local government and direct and indirect employment and economic stimulus in the affected communities.

The main impacts associated with MML relate to the need to construct additional mining infrastructure (e.g. pits, waste dumps, tailings, plant site) as well as establish a 500m safety exclusion zone around blasting areas. Project design has and will continue to reduce project footprint as far as practicable to avoid the need for resettlement. Mining infrastructure construction will require the resettlement of a number of communities affected by economic and physical displacement.

Re-alignment of roads within the mine concession area will affect movement of people in villages surrounding the site, in particular increasing their journey distances to and from Lunsar.

Other significant impacts that will be experienced by communities close to the mine site area are the effects of in-migration of job seekers looking for work at the mine site. Population influx can create a variety of negative impacts from loss of community cohesion, pressure on local services, changes to patterns and incidence of disease, and increased crime and inflation in the housing market, though it also has positive effects such as increased demand for goods and services, housing and general economic stimulus.

Some communities or individual structures may be affected by impacts associated with mining and concentrate haulage to Thofayim. MML believe that the mitigation measures outlined in the MML Project ESIA will be sufficient to effectively manage these potential impacts. Mitigation is the preferred option and resettlement will be avoided wherever possible. To verify the efficiency of the mitigation measures, MML will implement an extensive environmental monitoring program that covers air quality, noise and vibration. The results of this work will be used by MML to feedback into the management of these potential issues and trigger additional mitigation measures if required. Only when all alternative mitigation options are exhausted shall resettlement be considered.

3.1.2 HAUL ROAD

The key issues surrounding the concentrate haul road are health and safety issues around use of the road by both Project traffic and members of the local communities. Noise, dust and vibration are also likely to be perceived impacts. and farmers leading to the risk of injury from a collision with road traffic. These concerns notwithstanding, communities throughout Sierra Leone commonly straddle roadways, in order to gain close proximity to transport. There is also the risk of collision with MML heavy vehicles by non-MML cars and Okadas (motor bike taxis) that also use this road to access their communities. Speed and road conditions are the primary factors influencing the severity of these risks.

3.1.3 BARGING ROUTE

The current stockpiling and barge loading facilities at TRT are capable of handling the concentrate tonnes from the operation without any significant constructions requirements.

The main social issues will be around the use of the river and the potential for conflict with other river users. Current river users include fishermen, sand miners, and people using the river to travel to markets or access other services outside of their communities such as schools. Mitigation measures will include speed limits on MML vessels to minimise wake and the use of a designated channel.

Maintenance dredging of the barging channel will temporarily affect water quality due to increased sedimentation and turbidity, and may potentially impact fishing in the immediate area of operation for the duration of active work. Whilst dredging operations occur, they also pose a navigation risk to other vessels in the immediate area and will also require management to avoid issues occurring.

4 ROLES AND RESPONSIBILITIES

4.1 Human Resources

MML is committed to providing the human resources required to implement this plan. MML has a dedicated Community Relations Department headed by a Community Relations Manager. Divisional oversight and support will be provided by a General Manager Human Resources & Community Relations (GM-HRCR).



Figure 1: Community Relations Department Organogram

Accountability for implementing the SMP lies with the General Manager Human Resources and Community Relations with oversight by the Managing Director. Implementation of the SMP and verifying achievement of the KPI's is the responsibility of the Community Relations Manager, supported by the Deputy Community Relations Manager, Community Relations Superintendent and wider Community Relations team.

Table -1 shows the responsibilities of the key staff that will be involved in implementation of this SMP.

Table -1 Responsibilities of Key MML Staff

Responsible Party	Responsibilities
Managing Director	<ul style="list-style-type: none"> • Ensure the necessary resources (financial, manpower etc) to implement the proposed SMP targets and KPI's are available • Actively and visibly support the implementation of the MML SMP and related policies • Conduct meetings with Department General Managers at least once a month in which social performance is part of the agenda • Define individual responsibilities for General Manager – HR and Community Relations and assess performance annually
General Manager - Health, Safety and Environment (GM-HSE-)	<ul style="list-style-type: none"> • Ensure community health and safety measures are properly implemented and any Project related health and safety impacts are mitigated and monitored as per the Environmental Monitoring Plan • Work with government bodies on any initiatives to address wider health and safety concerns in the Project communities • Ensure OHS and environmental incidents are fully investigated and appropriate mitigation measures are implemented • Development and implementation of the Mine Closure Plan • Development and implementation of the Waste Management Plan
General Manager - Security & Export (GM-SE)	<ul style="list-style-type: none"> • Maintain access security to mine site in line with MML Access Policy and related security protocols to prevent unauthorised access and report/investigate breaches • Ensure security personnel are trained in Voluntary Principles on Security and Human Rights; and that systems are in place in case of breaches of Project standards. • Ensure concentrate haulage and barging operations, as well as any dredging activities, are conducted in a safe manner • Understand potential impacts of activities to surrounding environment, including air, water and noise and implement management strategies to avoid or mitigate impacts.
General Manager - Operations (GM-O)	<ul style="list-style-type: none"> • Ensure mine plans are communicated to Community Relations Department well ahead of schedule, taking into account lead time required for potential compensation and resettlement requirements. • Ensure mining and process operations are conducted in safe manner • Understand potential impacts of mining and process related activities to surrounding environment, including air, water and noise and implement management strategies to avoid or mitigate impacts.
General Manager - Procurement, Materials & Contracts (GM-PMC)	<ul style="list-style-type: none"> • Ensure MML Local Procurement Policy and Sierra Leone Local Content Policy are implemented in purchasing process and monitor • Ensure pertinent MML policies are communicated to contractors

Responsible Party	Responsibilities
General Manager – HR and Community Relations (GM-HRCR)	<ul style="list-style-type: none"> • Ensure that SMP activities and social objectives for the Project are identified and integrated into operational plans • Ensure that the public participation process is effective and proactive, and that cooperative relationships with the communities are maintained • Oversee the implementation of the SMP. • Oversee the resettlement process • Maintain knowledge of and ensure compliance with employment and community related laws and regulations, including applicable international guidelines • Oversee the organizational development & training function and develop employee training programs • Ensure that resettlement activities are undertaken effectively and in compliance with international and Sierra Leonean standards and the approved Resettlement Action Plan
Community Relations and Resettlement Manager (CRM)	<ul style="list-style-type: none"> • Coordinate all activities pertaining to the SMP, including monitoring mitigation targets on a day to day basis • Monitor the achievement of those components of the SMP whose implementation is the responsibility of other departments • Coordinate and lead on the resettlement process in line with the approved Resettlement Action Plan. • Ensure that the project operate in accordance with applicable regulatory and MML social requirements and the SMP • Ensure effective communication with all internal/external (where applicable) stakeholders • Input to project management controls and initiatives related to social issues as appropriate • Collect, compile and analyse performance statistics and submit as appropriate to MML Management and Sierra Leone authorities • Ensure that the project operates in accordance with the requirements of this SMP and subsidiary documents • Ensure that social management awareness is included as part of the project induction/orientation • Liaise with operational management to ensure that duties and commitments in support of this SMP are expedited efficiently and in a timely manner • Oversee the grievance process and report to senior management as required • Assess and determine community investment priorities, in line with Project social impacts • Ensure effective communication with all internal/external (where applicable) stakeholders <p>Lead on the implementation of social investment initiatives including monitoring and evaluation</p>
Deputy Community Relations Manager (DCRM)	<ul style="list-style-type: none"> • Support Community Investment Manager in implementing SMP •

Responsible Party	Responsibilities
Community Relations Superintendent (CRS)	<ul style="list-style-type: none"> • Work with CR Officers in the communities to monitor success of mitigation measures • Support the Community Relation Manager to implement all the requirements of the SMP
Community Relations Officer (CRO)	<ul style="list-style-type: none"> • Support the Community Relation Manager to implement all the requirements of the SMP • Maintain two way communication with the community throughout the Project lifetime, in particular the resettled communities; • Monitor success of mitigation measures and collect data to assess achievement of the Project social KPI's • Make communities aware of the grievance mechanism and record and report all grievances to the Community Relations Manager

4.2 Financial Resources

Table 3 summarises the key financial resources that will be required by MML to facilitate the social mitigation and management measures. The indicated costs exclude salaries for personnel and services (e.g. power). Note current quoted costs are geared towards the restart process; operational budgets will be drawn up prior Project restart.

Table 3 Indicative Financial Resources for Management of Key Social Risks and Impacts

Social Area	Description	Budget
Community Development	Community Development Projects from Community Development Agreement Process with primary host community of Marampa and Maforki Chiefdoms	Based on gross revenue. As stated in the CDA and enshired in mining regulation (Mines and Minerals Act, 2009), at least 0.01% (actually 1%) of sales revenue to be used as part of a Community Development Fund.
Community Sensitization Programmes	Programmes to inform communities of project restart; company policies on site access, community safety, employment, etc; grievance mechanism etc.	USD 10,000
Administration	Overheads including vehicles, fuel, reports, etc	USD 30,000

5 SOCIAL MANAGEMENT SYSTEMS

This SMP is a framework document that provides the overarching guidance to the social management of the MML Project. One purpose of the SMP is to identify the requirements of site management and the detailed management plans that will be used to implement these requirements. Each plan defines the scope of the plan, the activities to be undertaken, roles and responsibilities. Table 44 lists other key project management plans required for this project that have been developed as part of this ESIA or that will be developed at a later stage of the Project.

Table 4 Project Social Management Plans

Plan Name	Contents	Plan Manager
Resettlement Policy Framework (RPF)	The RPF summarises the overall approach that MML will take with resettlement, which is in line with Sierra Leonean laws and regulation and MML's. The RPF also identifies the need for a livelihood restoration plan is in place for communities that need to be resettled as a result of this project.	Community Relations Manager
<i>Community* Development Agreement (CDA)</i>	The CDA will be between the company and the primary host communities of Marampa & Maforki. It sets out the framework for the relationship between MML and these host communities, including how the statutory 1% of MML turnover shall be spent on community projects.	Community Relations Manager
<i>Grievance Management Plan</i>	Specifies an efficient and controlled process to allow individual groups or stakeholder to lodge formal complaints about MML activities.	Community Relations Manager
<i>Mine Closure Plan (MCP)</i>	Identifies decommissioning and rehabilitation requirements for the project, including the need to agree end land uses with landholders and communicate closure activities to Project communities and workers	HSE General Manager

6 MANAGEMENT AND MONITORING ACTIVITIES

Error! Reference source not found. is designed to be a practical plan detailing the actions required to avoid or reduce potential negative project impacts to acceptable levels and maximise potential positive impacts. Monitoring measures are also outlined to ensure that the plans are having the desired effect.

For clarity, and in line with the ESIA, the table is divided into the following sections:

1. Physical and economic displacement
2. In-migration
3. Access to public services
4. Cultural heritage
5. Employment and the economy
6. Community health
7. Community safety and security

NOTE: Where applicable, sections have been divided into the phases of the project e.g. construction, operation and decommissioning.

General note: When a reference is made to 'Project' assets, activities or personnel, it refers to any asset/activity/personnel that are working on the Project whether under direct MML control or its contractors. For example 'Project vehicles' refers to all vehicles that are owned/leased by MML or its contractors that are in use for Project related work or business.

Table 5: Physical & Economic Displacement

Ref. No.	Description of Impact / Issue	Mitigation / Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
<i>During Construction</i>						
1.1	Loss of assets and livelihoods for those who are affected by physical or economic resettlement due to displacement from the mine concession area and/or the safety exclusion zone.	MML will design the Project to avoid and/or minimise resettlement requirements as far as practicable, by appropriate design of the mine site pits and waste dumps, maintenance of the haul road and mitigation of potential impacts such as noise and dust as outlined in the EMP.	Refer to the Project EMP for dust and noise KPIs	Project life	GM-HSE GM-O GM-SE	ESIA EHSP
		<p>MML will implement the Resettlement Policy Framework (RPF) developed for the Project.</p> <p>Where resettlement is unavoidable, MML shall provide compensation at replacement value for loss of physical assets, revenue and income resulting from the both temporary and permanent economic and/or physical displacement.</p> <p>Like for like replacement is the minimum standard for resettlement.</p>	RPF prepared. RAP developed and approved.	Prior to land clearance and construction of facilities.	CRM	ESIA RPF

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
		<p>MML will commission the development and implementation of a RAP in accordance with Sierra Leonean laws and regulations.</p> <p>Consultation with communities (host and resettled), traditional authorities and the government regarding the selection of potential resettlement sites, livelihood restitution and the collaboration of community associations.</p>	<p>RAP document prepared and approved including Livelihood Restoration Plan.</p> <p>Individual entitlements matrices agreed and signed off by affected households.</p> <p>Stakeholder meeting minutes.</p> <p>Hand-over of new structures and replacement land/ livelihoods.</p> <p>Implementation of RAP.</p>	<p>Communities to be resettled prior to Project work starting in the area concerned.</p> <p>Prior to clearing of agricultural land - MML to be cognizant of crop cycles with regards to timing.</p> <p>Ongoing consultation to ensure satisfaction with the process.</p>	CRM	<p>ESIA</p> <p>RPF</p> <p>Grievance Mechanism</p> <p>Resettlement Policy</p>
		<p>MML will ensure that vulnerable groups are given appropriate attention in the RAP to enable these households to re-establish or improve their standard of living and livelihoods.</p>	<p>Documentation identifying vulnerable households in RAP.</p> <p>Meeting minutes with vulnerable groups.</p>	<p>During RAP development and implementation process.</p>	CRM	<p>ESIA</p> <p>RPF</p>

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
1.2	Loss of access routes to Lunsar.	MML will ensure that public access to Lunsar by all communities is maintained either by continued use of existing roads through the mine concession area or, where required for safety reasons, constructing replacement access roads to Lunsar. Two key routes for public access exist that must be maintained; the eastern communities axis (e.g. Maforki/Magbil/ Marampa) and the southern communities axis (e.g. Katik/Mapoli/Konta Bana, Gbom Limba).	Access for all communities to Lunsar is maintained. Grievances reported and dealt with according to Grievance mechanism.	Alignment of this public access will need to be in accordance with the mining schedule. Replacement access to be constructed before loss of existing access.	CRM	ESIA: Resettlement Policy Community Access Policy
1.3	Risk of economic loss due to dredging activities.	MML will inform communities along the barging route of potential dredging activities that will take place and ensure safe passage along the Creek is maintained at all times by requiring the dredging contractor to maintain a safe channel on one bank. Dredge contractor will maintain "low wake" speed limits and follow fixed channels in the Port Loko Creek so that transportation can continue uninterrupted outside of the channel.	Meeting minutes. Contracts with dredging and contractors specify speed limits and requirement to maintain a safe channel for community boats. Grievances reported and dealt with according to Grievance mechanism. Dredging Management Plan to be developed prior to dredging operations to include	Prior, during and subsequent to dredging activities.	CRM DCRM GM-HSE GM-SE	ESIA Grievance Mechanism Community Health and Safety Policy

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
			access management and community safety.			
<i>During Operation</i>						
1.4	Economic losses due to accidental events damaging crops.	Where damage has occurred as a result of MML activities, MML will pay compensation for crop losses in line with the GOSL compensation rates or MML derived rates based on market valuations by qualified internal or external experts.	Grievances reported and addressed according to grievance mechanism. Records of compensation paid in line with compensation rates (subject to annual updates).	According to timing specified in the grievance mechanism.	CRM DCRM	ESIA Grievance Mechanism RMP RAP Resettlement Policy Community Health and Safety Policy
		MML will maintain its grievance mechanism to allow any crop losses associated with accidental events to be reported and investigated to prevent re-occurrences.	Grievances reported and dealt with according to grievance mechanism. Records of compensation paid.	According to timing specified in the grievance mechanism.	CRM DCRM	
1.5	Risk of economic loss due to barging activities.	MML will maintain "low wake" speed limits and follow fixed channels in the Port Loko Creek so that fishing can continue uninterrupted outside of the channel.	Contracts with barging contractors specify speed limits and requirement to maintain a safe channel for community boats. Grievances reported and dealt with according to Grievance mechanism. Dredging Management Plan developed prior to operations	Prior, during and subsequent to barging activities.	CRM DCRM GM-HSE GM-SE	

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
			includes access management and community safety.			
<i>Decommissioning</i>						
1.6	Land use post closure.	<p>Community consultation on end land uses, as per the Mine Closure Plan.</p> <p>The site should be handed back to landholders in a productive state that is safe, stable and sustainable.</p> <p>Adverse socio-economic impacts are minimized and benefits are maximized.</p>	<p>Meeting Minutes.</p> <p>Agreements regarding land use post closure.</p> <p>Grievances reported and dealt with according to grievance mechanism.</p>	<p>Prior to Mine Closure.</p> <p>Mine site to be progressively rehabilitated and post-closure monitoring.</p>	<p>CRM</p> <p>GM-HSE</p>	<p>Mine Closure Plan</p>

6.1 In-Migration

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
<i>During Construction</i>						
2.1	Influx of opportunistic job seekers into the mine area.	<p>Direct job applications on site are not permitted. All job applications to be made through the processes of the MML recruitment procedures, to minimise speculative job seeking.</p> <p>MML will maintain effective access control procedures.</p>	<p>Number of people seeking jobs at the mine site.</p> <p>Number of people seeking jobs at the MML Information Centre.</p> <p>Number of people responding to job adverts as per the recruitment process.</p> <p>Number of speculative applications received.</p>	Annually.	GM-HRCR GM-SE	<p>ESIA: Influx Management Policy Local Content Policy</p>
		Monitor population or indicators of population influx	Official GOSL figures (e.g. National Census) and proxy indicators on population growth (e.g. clinic attendance numbers)..	Annually (or as frequently as they are available).	CRM	<p>ESIA Influx Management Policy</p>

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
		Contractors that maintain facilities inside the mine concession area (by agreement with MML) will ensure they are secure, and that there is no recruitment on site.	Qualitative assessment of number of opportunistic job seekers approaching these facilities. Physical inspection of facility perimeters.	Project life	GM-HRCR GM-SE Contractors	
2.2	Encroachment of settlements/traders around mine concession site.	MML shift workers are provided with a main meal and water at on site facilities. Mine workers will only be allowed to purchase food and drinks on site during working hours at authorised selling points run by local communities.	Number of licensed and unlicensed traders operating within the mine concession. Number of fence line traders.	Quarterly.	CRM GM-SE	ESIA Influx Management Policy
2.3	Opportunistic settlers due to expectation of receiving resettlement benefits.	Resettlement activities will be designed to avoid or reduce incentives for opportunistic capture of resettlement benefits.	Number of opportunistic claimants of resettlement packages as identified through RAP process and / or grievance mechanism.	During RAP process.	CRM	ESIA RAP RPF Resettlement Policy

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
2.4	Support administrative structures. to	Making available Community development funding for projects associated with influx management, in particular those addressing potential health risks.	Number of MML supported projects and records of tangible outputs.	Project life	CRM	ESIA Influx Management Policy CDA
2.5	Inflation.	Monitoring of local prices, so that local inflation rates (e.g. for room/house rents, access to health services, food staples) can be assessed objectively.	Documentation of prices on a 'basket of goods' e.g. rice, fruits and vegetables and compared to national inflation figures.	Annually.	CRM DCRM	ESIA: Influx Management Policy

6.2 Access to Public Services

Ref. No.	Description of Impact / Issue	Mitigation / Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
3.1	Access to health services	Support health, water, sanitation and hygiene (WASH) infrastructural initiatives that address community priorities outlined in the CDA.	Number of initiatives supported and implemented. Documentation of projects.	Annually.	CRM DCRM	ESIA CDA
		Include cost of health services in Lunsar as part of inflation monitoring (See point 2.5)	Monitoring conducted	Annually	CRM DCRM	ESIA
3.2	Waste management services.	Implement the Project waste management plan to ensure waste is appropriately managed, prioritising waste reduction, reuse and recycling. No reliance on District public waste-disposal services.	(See EMP for environment related issues).	Ongoing	GM-HSE	ESIA Waste Management Plan

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
3.3	Access to education.	Invest in educational supplies for schools impacted by migrant workers families	Number of scholarships granted. Quantity of supplies granted	Annually.	CRM DCRM	ESIA CDA Community Investment Policy
		Support the training of teachers	Number of teachers trained.	Annually.	CRM	
3.4	Water quality and access.	Conduct monitoring to ensure that Project water management will not deplete local water supplies (i.e. drinking, farming, washing) and replace supplies where impacts are evident.	Monitoring of community access to water, especially wells at risk from any project-induced changes in the water table, show no issues (supply and quality) created by MML related activities. Refer to Project EMP.	Ongoing.	Environment Manager	ESIA: Environmental Monitoring Plan Grievance Mechanism

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
		<p>Support health, water, sanitation and hygiene (WASH) infrastructural initiatives that address community priorities as outlined in the CDA.</p> <p>Invest in clean water for communities and better community sanitation as described in the CDA</p>	Number of water related investments.	Annually.	CRM	ESIA CDA

6.3 Cultural Heritage

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
4.1	Disruption or loss of access to sites of cultural significance.	<p>Wherever it is possible, the project will avoid physical disturbance or restricted access to cultural heritage sites. When avoidance is not possible or mitigation strategies cannot be implemented, cultural heritage sites will be relocated</p> <p>Payment of compensation to affected households and/or communities for loss or movement of any graves, sacred and/or archaeological sites.</p> <p>Sponsor cultural rites required for the movement or abandonment of cultural sites.</p> <p>Note: MML will not support ceremonies that contravene the laws of Sierra Leone.</p>	Grievances reported and dealt with according to grievance mechanism.	Mainly during resettlement activities	CRM CRM	ESIA RPF
		As part of the RAP, MML will identify physical structures that require relocation and make provision for their relocation	Cultural heritage sites identified in the RAP and relocated.	During RAP.	CRM	ESIA RAP RPF

6.4 Employment & the Economy

Ref. No.	Description of Impact / Issue	Mitigation / Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
<i>During Construction and Operation</i>						
5.1	Maximising local procurement opportunities.	<p>MML will maximise local procurement opportunities by implementing a local procurement policy which includes the following measures:</p> <ul style="list-style-type: none"> • Increase awareness among the local business networks of opportunities to become a supplier to MML, through the use of open tendering processes; • Measure and report the percentage of procurement that is sourced locally and aim to increase this on a year-by-year basis; • Where supplier terms are equal, give preference to the local company; and <p>MML requires contractors to meet the requirements of the Government of Sierra Leone which includes the National Local Content Policy.</p>	Percentage of contracts held with Sierra Leonean companies.	Annually.	GM-PMC GM-HRCR	ESIA Sierra Leone Local Content Policy

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
		MML will judge them against compliance with this Policy.				
5.2	Local direct employment opportunities.	MML will maximise the employment of local people by offering preferential employment to locals as long as they have the prerequisite skills and experience.	Percentage of applications from local people with appropriate qualifications.	Annually.	GM-HRCR CRM	ESIA
5.3	National economic benefits from tax and royalty payments.	Payment of taxes and royalties.	Accounting records. EITI compliance records.	Annually.	GM -Finance	Extractive Industries Transparency Initiative
Decommissioning						
5.4	Loss of employment with MML in affected communities' due to closure	MML will keep its workforce informed about the remaining life of the mine.	Workforce meeting minutes.	Quarterly in the 2 years prior to decommissioning	GM-HRCR	ESIA MML Mine Closure Plan Employment contracts Any Union or Collective

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
						Bargaining Agreements
		Ensure employees are prepared for working in a competitive workplace after closure.	Number of workers that have completed skills training. Workforce meeting minutes.	Quarterly in the 2 years prior to decommissioning.	GM-HRCR	Mine Closure Plan
		Aid the outgoing workforce in finding work post-closure, by providing 3 rd party outplacement services, where appropriate.	Percentage of workforce receiving outplacement services.	Quarterly.	GM-HRCR	
		Staggering of layoffs and adequate notice of closure.	Number of people retrenched per month in the 2 years prior to mine closure.	Quarterly.	GM-HRCR	Mine Closure plan

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
		In the event of redundancies, MML will provide adequate and competitive severance pay adhering strictly to the requirements of Sierra Leonean Labour Laws, employment contracts as well as the appropriate statutory obligations according to the Terms of Agreement under any relevant Unions' Employees Bargaining Agreements	Staff receiving benefits as per Sierra Leonean Labour law and contracts. Grievances reported and dealt with according to grievance mechanism.	Quarterly.	GM- HRCR	

6.5 Community Health

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
6.1	Changes to community disease patterns.	Establish monitoring programmes for potentially significant health risks caused by company operations.	Monitoring program data.	Annually.	GM-HRCR	
		Seek collaboration with national and district health authorities on public health challenges such as malaria, HIV/AIDS, cholera and other water-borne diseases.	Number of joint initiatives implemented.	Annually.	CRM	
		Collaborate with national and district health authorities in monitoring major public health risks such as cholera and participating in appropriate response plans.	Monitoring program data	Annually	GM-HRCR	
		Be prepared to commit community investment funds to public health initiatives, within the framework of the Community Development Agreement and the Port Loko District Development Plan.	Number of joint initiatives implemented.	Annually.	CRM	
		Initiate a workplace malaria and vector control programmes.	Number of cases of malaria among MML workers on site.	Annually.	GM-HSE	

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
			Number of bed nets issued to workers.			
		Support the development or improvement of health information systems at the district and chiefdom level, including epidemiological monitoring.	Number of initiatives supported.	Annually.	CRM	
6.2	STI transmission.	Participate in relevant sectorial initiatives such as the Business Coalition on HIV/AIDS and joint efforts on disease vector control.	Number of joint initiatives implemented.	Annually.	CRM	ESIA Port Loko District Development Plan CDA
		Offer voluntary STI screening for workers, while maintaining the policy that workers will not be denied employment or discriminated against in any way based on their HIV status.	Number of screenings conducted.	Annually.	GM-HRCR GM-HSE	
		Community sensitisation on HIV/AIDS and STIs as well as malaria, cholera and diarrhoeal diseases, as per the CDA.	Number of sensitisation programmes implemented. Number of attendees.	Annually.	GM-HRCR	

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
			Using available government data, monitor trends in disease prevalence.			
		Worker disease awareness training, covering cholera, malaria, HIV/AIDS, STIs and other diseases as appropriate.	Percentage of workers receiving health sensitisation training.	Annually.	GM-HRCR GM-HSE	
		Access to free condoms (including female condoms) at all worker camp sites and accommodation.	Number of dispensaries stocked. Number of condoms distributed.	Annually.	GM-HSE CRM	
		Forbid illegal activities by all Project personnel, including the use of commercial sex workers, transactional sex, and the use and / or trafficking of illegal substances.	Percentage of employees who have received induction training covering this issue.	Annually.	GM-HRCR GM-HSE	
		Develop all Project personnel code of conduct that includes guidelines on worker-worker interactions, worker-community interactions, development of personal relationships with members of the local communities, alcohol consumption, etc.	Percentage of employees who have received induction training covering this issue. Grievances reported and dealt with according to grievance mechanism. Signatures to the Camp Residence Policy, and evidence of investigation of	Annually.	GM - HRCR GM-HSE	

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
			those in breach of its provisions (e.g. on curfew hours and visitors)			
6.3	Blasting.	<p>Stakeholder engagement with local communities regarding blasting.</p> <p>Ensure blast crew trained and implement blasting procedures.</p> <p>Implement monitoring program for all blasts, including vibration and noise.</p>	<p>Meeting minutes.</p> <p>Grievances reported and dealt with according to grievance mechanism.</p> <p>Number of blasts that exceed Project blasting limits</p>	Quarterly.	<p>CRM</p> <p>CRM</p> <p>GM-O</p> <p>GM-HSE</p>	<p>ESIA:</p> <p>Grievance Mechanism</p> <p>Blasting procedures</p> <p>EMP</p>

6.6 Community Safety & Security/Traffic & Transport

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
6.1	Unauthorised access to active Project areas.	Security personnel will patrol site area to prevent unauthorised access onto the site along with ensuring that protocols for accessing the site through gates are observed. Security fences will be used where required along with access controls to minimise potential entry by unauthorised personnel.	Number of incidents involving unauthorised people on site reported. Number of injuries to general public resulting from unauthorised access to the mine site.	Annually.	GM-SE and Security Manager	ESIA Project Security Plan HSE Management Plans
		Reasonable measures will be taken to discourage entry by the public into operational areas, e.g. signage and dialogue.	Number of incidents involving unauthorised people on site reported. Meeting Minutes.	Annually.	GM-SE and Security Manager CRS	
		Security arrangements are communicated to relevant stakeholders including workers and communities, without compromising the security of the Project.	Meeting minutes.	Annually.	GM-SE and Security Manager CRS	
		As part of the stakeholder engagement activities communities in the vicinity of the mine site and Thofayim will be informed about the risks and consequences of trespassing onto the sites.	Number of incidents involving unauthorised people on site reported.	Annually.	GM-SE and Security Manager	

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
					CRS	
6.2	Safety of river users.	The Project will conduct awareness raising campaigns regarding the barge and vessel movements and risk. These sessions will be aimed at harbourmasters, fishermen and other river users and will include sessions also aimed at school children.	Number of awareness campaigns run in all affected communities. Grievances reported and dealt with according to grievance mechanism.	Quarterly.	CRM GM-SE	ESIA HSE Management Plans
		Speed limits in place for barges and tugs of 4.5 to 6 knots (i.e. no wake speed) in Port Loko Creek and above Tasso Island. Monitoring of barge speed and location by GPS tracking system. Small MML vessels should maintain speeds under 10 knots in the middle and upper reaches of the Port Loko Creek.	Grievances reported and dealt with according to grievance mechanism. Number of times that barges/tugs exceed speed limits. Records of onboard monitoring equipment.	Quarterly.	CRM GM-SE	
		Tugs fitted with lights, spot lights, horns and navigation systems to travel at night. Tugs and barges to be well maintained.	Grievances reported and dealt with according to grievance mechanism. Number of tugs fitted with working equipment.	Quarterly.	CRM GM-SE	

Ref. No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
		All captains and senior officers used by MML are certified and trained.				
		Investigate all river incidents allegedly involving MML – determine cause, and take action.	Grievances reported and dealt with according to grievance mechanism.	Quarterly.	GM-SE GM-HSE	
6.3	Safety of road users	Maintain fixed crossing points in populated areas such as Lunsar where assessed as necessary. Construct safety berms where assessed as necessary Ensure communities can safely cross the haul road.	Number of school children walking along the haul road to/from school Grievances reported and dealt with according to grievance mechanism. Number of incidents involving pedestrians	Ongoing.	CRM GM-SE	ESIA HSE Management Plan Traffic Management Plan
		Enforce rules on Project speed limits and road usage for all company vehicles and contractor vehicles using the haul road.	Disciplinary action taken against speeding drivers. MML speed monitoring detects no exceedance of project speed limits.	Ongoing.	CRM GM-SE	
		Investigate all road incidents allegedly involving MML – determine cause, and take action.	Grievances reported and dealt with according to grievance mechanism.	Quarterly.	GM-SE GM-HSE	

Ref.No.	Description of Impact/ Issue	Mitigation/ Management Measure	KPI's and Related Actions	Timeframe/Frequency	Responsible Party in MML	Reference Document
		Ensure all MML drivers are qualified, trained to drive safely and have required licenses.	Audit records of driver's licenses. Records of attendance at defensive driving course driver training	Annual.	GM-SE GM-HSE	
		Ensure that trucks are driven in safe manner suited to conditions.	MML speed monitoring detects no exceedance of project speed limits.	Quarterly.	GM-SE GM-HSE	
		Maintain all vehicles to international requirements.	Records of maintenance checks on all MML and hired vehicles. Vehicle incident investigation include assessing potential issues relating to maintenance.	Annual.	GM-SE GM-HSE	
		Maintain road and safety related signage.	Regular inspections to check all signage is still in place.	Annual.	GM-SE GM-HSE	
		Community information sessions around road safety and project related road usage.	Meeting records of awareness campaigns in all affected communities.	Annual.	CRM GM-HSE	