



**ADRIATIC METALS PLC
VARES PROJECT
EMERGENCY PREPAREDNESS AND RESPONSE PLAN**

FEBRUARY 2022

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EMERGENCY PREPAREDNESS AND RESPONSE PLAN

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INTRODUCTION

1.0 Purpose and Scope

Eastern Mining d.o.o. is owned and operated by Adriatic Metals PLC (ADRIATIC METALS) and located in Bosnia and Herzegovina (BiH). Eastern Mining d.o.o. is the holder of a concession for exploration and exploitation in Vareš (BiH). Since 2017, ADRIATIC METALS has been conducting research at several sites in the municipality of Vareš, for the first time since the 1980s. The company's focus is on exploring minerals that have the potential to grow the company. The ultimate goal is to revive the mining industry in the municipality of Vareš, by exploiting new and existing ore deposits. New potentials have been identified in Rupice, where research and exploitation of lead, zinc and barite have been carried out before. The deposits were further expanded and subjected to extensive research and contained significant amounts of lead, zinc, silver, gold, copper and barite. The project, named Vares Project is polymetallic mine, and has attracted reputable foreign investors in BiH. In many ways, this research project is unique in post-war BiH, both in terms of investment size and development potential.

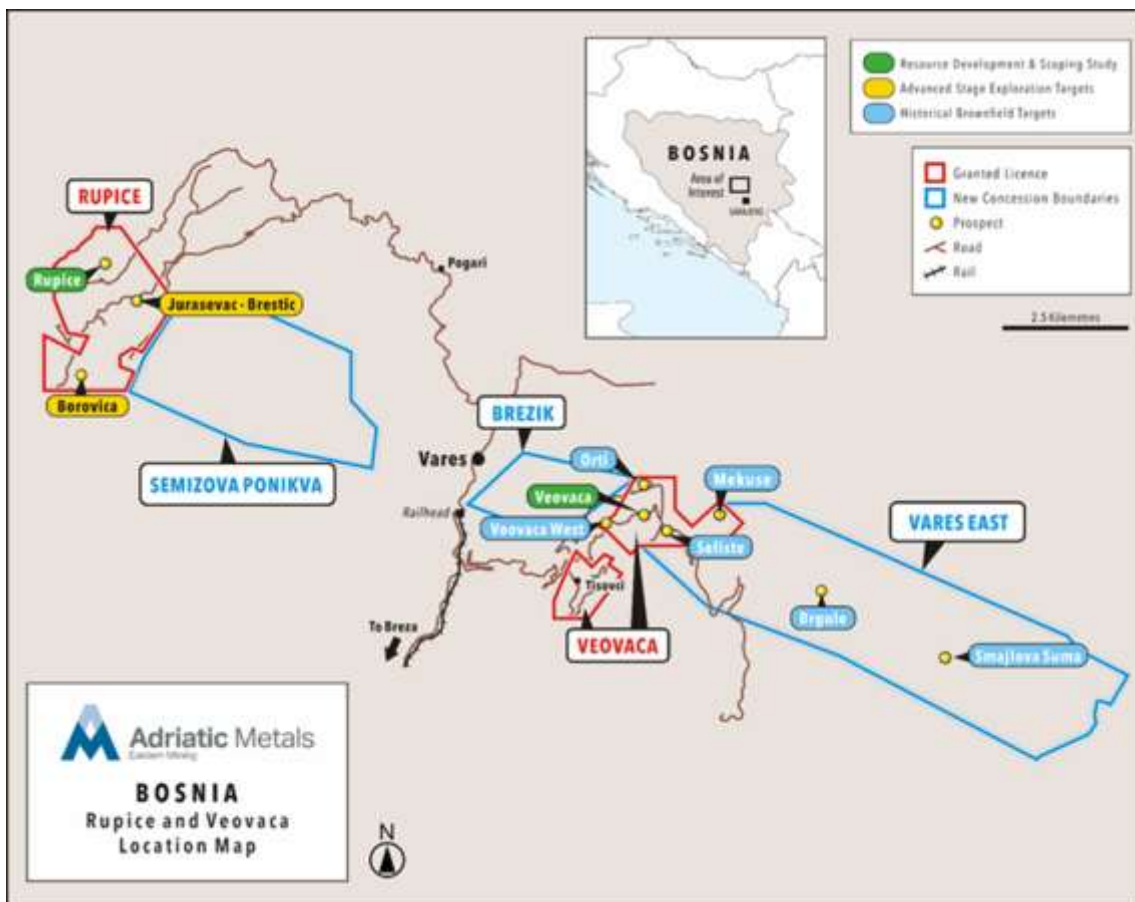


Figure 1.1. Map showing the location of the Vares Project

The purpose of this Emergency Preparedness and Response Plan (EPRP) is to describe the Emergency Preparedness and Response Process which will be implemented and supported by specific Response Plans during the construction, commissioning and operational phases of the Vares Project.

This EPRP has been developed to describe the standards and specific procedures that will be followed by ADRIATIC METALS and its contractors in the event of an emergency related to the Vares Mining Project (Project). During the construction phase of the Project, this document will serve as an operational guideline for the Project Managing Consultant (PMC) and ADRIATIC METALS, to ensure appropriate management oversight is implemented during an emergency.

Emergency situations and corresponding procedures are defined including roles and responsibilities and communication with appropriate regulatory authorities. The document is also intended to serve as a training and reference guide for staff and contractors. Specific Emergency Response Plans will be developed, implemented and updated at various stages throughout the life of Vares Project to reflect the operating conditions and ensure conformance with standards.

It should be noted that due to the relatively remote nature of the underground mine, haul road and processing plant that the Company will need to be self-sufficient in key areas in terms of emergency response (for example, underground rescue), although it recognises that there are requirements to work with the local emergency response providers in responding to emergencies that occur where company activities are close to communities, such as around the processing plant, or where the project and the public are using the same infrastructure (namely the haul road).

2.0 Legislative Requirements and Standards

ADRIATIC METALS intends to implement practices in accordance with international practices in addition to local legislation, respecting principles and policies of the European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC).

2.1 National Legislation

- Environmental Protection Law ("Official Gazette of the Federation of BiH", No. 15/21)
- Mining law ("Official Gazette of the Federation of BiH", No. 26/10)
- Occupational safety law ("Official Gazette of the Federation of BiH", No. 79/20)
- Fire protection and firefighting law ("Official Gazette of the Federation of BiH", No. 64/09)

Local contacts in case of an emergency

In the event of any emergency situations, the following institutions shall be notified:

<i>Institution</i>	<i>Contact</i>	<i>Contact person</i>
<i>Vares ambulance service – first aid</i>	032/843-034	
	032/843-052 124	Predrag Šešlija
<i>Civil Protection Operations Centers - Information Center</i>	032/848-100	
	121	Ibrahim Spahić
<i>Professional fire brigade Vares</i>	032/843-028 123	Duty worker
<i>Police station Vares</i>	032/843-027 122	Edin Hajdo

2.2 International requirements

The EBRD Performance Requirement (PR) 4 and IFC General Environmental Health and Safety Guidelines set out the following recommendations with regard to spills and emergency response:

- ✓ All projects should have an Emergency Preparedness and Response Plan that is commensurate with the risks of the facility and that includes the following basic elements:
 - Administration (policy, purpose, distribution, definitions, etc.);
 - Organization of emergency areas (command centres, medical stations, etc.);
 - Roles and responsibilities;

- Communication systems;
- Emergency response procedures;
- Emergency resources;
- Training and updating;
- Checklists (role and action list and equipment checklist);
- Business Continuity and Contingency.

ADRIATIC METALS also intends to comply with EBRD PR 4 and IFC Performance Standard 3, Pollution Prevention and Abatement, IFC Performance Standard 4 on Community Health, Safety and Security and the Voluntary Principles on Security and Human Rights. This entails the implementation of a community awareness programme to ensure that nearby communities are prepared for emergencies that may occur, through an **Awareness and Preparedness for Emergencies at local Level (APELL)** process (UNEP 2001), or similar. The APELL process is described below and will be implemented during the early stages of construction and documented separately, but as a supporting document to this EPRP.

3.0 Roles and Responsibilities

3.1 Company

ADRIATIC METALS will be the main responsible party for assuring successful implementation of this EPRP. ADRIATIC METALS will have primary responsibility for relationship management with key Project stakeholders and participants such as the local authorities, local emergency services, permitting authorities and other government entities. As the Project is developed, ADRIATIC METALS will describe key stakeholder positions with delegated authority and responsibility to fulfill the requirements described in this EPRP.

The following organizational chart depicts proposed primary responsibility and reporting pathways for implementation of this EPRP.

Detailed Company responsibilities are:

- ✓ to issue this procedure to contractors;
- ✓ to oversee the implementation of this procedure;
- ✓ to provide central co-ordination and command and control of certain identified emergencies;
- ✓ to perform inspections and audits on contractors to measure compliance with this procedure and take steps to correct contractor behaviour where non-compliance is found;
- ✓ to co-ordinate joint planning and practical drills with contractors and with stakeholders;
- ✓ to receive and consider stakeholder recommendations regarding improved preparedness and response;
- ✓ to receive reports from contractors and reporting it to ADRIATIC METALS on monthly basis.

ADRIATIC METALS will provide engineering, procurement and construction management services to the Vares Project for the underground mine, processing plant and all miscellaneous activities associated with the Vares Project.

3.2 Principal roles and responsibilities

Principal roles and responsibilities for the implementation of this plan are outlined below.

Roles	Responsibilities
Executive Director/General Manager	<ul style="list-style-type: none"> • Ensure adequate resources are provided for implementation of this Plan • Adherence to all contract requirements and directives provided by ADRIATIC METALS regarding emergency response

Roles	Responsibilities
	<ul style="list-style-type: none"> • Ensure the Plan is distributed to all relevant Contractors and subcontractors during construction, all operations and closure activities
Emergency Response Manager	<ul style="list-style-type: none"> • Manage all emergency and critical event activities and will be supported by an integrated team of contractor and ADRIATIC METALS staff trained in emergency response and rescue actions. • Develop a Risk Register • Equipment including two (2) ambulances will be located at the mine to attend emergency response incidents and a fully equipped trauma medical centre will be located in Vares. • Additional provision will be made on the haul road for emergency airlift of injured persons • Develop a crisis management procedure to deal with emergency situations that outlines specific roles for each person to complete in the event of an emergency or crisis • Review the emergency preparedness and response procedures on a regular basis • As required, review and update the EPRP
Health and Safety Manager	<ul style="list-style-type: none"> • Coordinating and ensuring safe operating practices across mining areas and ensuring that the EPRP is implemented effectively including stakeholder involvement in drills and regular periodic updates to procedures to be implemented in case of an emergency • Coordinating and ensuring safe operating practices within the plant area, the haul road and the TSF • Supervise investigations related to emergencies that occur and ensure actions arising from these investigations are completed • Perform self-audits on emergency response requirements on a regular basis • review the emergency preparedness and response procedures on a regular basis
Construction Manager	<ul style="list-style-type: none"> • Coordinating and ensuring safe operating practices across the entire project site (mine, haul road and plant) and ensuring that the EPRP is implemented effectively including stakeholder involvement in drills and regular periodic updates to procedures to be implemented in case of an emergency. • Supported by a team of trained and experienced construction workers to supervise all activities and work toward prevention of incidents. • In the event of an incident the Construction manager and the ADRIATIC METALS ER Manager will conduct investigations into emergencies that occurred and ensure actions arising from these investigations are completed and communicated throughout the business. • Record and report all emergencies and investigate their causes

Roles	Responsibilities
	<p>and the adequacy of the response to further reduce the incidence of emergencies and improve outcomes of responses</p> <ul style="list-style-type: none"> • Provide proper equipment and materials to reduce the identified risks and to respond to identified risks which may result in emergencies, provide transport and staff for the appropriate response to the emergencies which may result • Train all staff in the objectives and principles as well as their part in responding to a range of emergencies • Train key staff in additional skills to enable them to join the Emergency Response Team (ERT) which will respond to emergencies • Perform inspections on a regular basis of emergency response requirements and take the necessary steps to correct where deviations are found
Environmental and Social Manager	<ul style="list-style-type: none"> • During an environmental related emergency, the Environmental & Social Manager will be responsible for determining what environmental emergency equipment is available at the project sites, identification of potential risks from incident and emergency situations and the management of any environmental repercussions, routine reporting of environmental performance in regard to preventive measures and responses to actual events, ensuring environmental emergency equipment is regularly inspected; and after an incident, inspecting the area and ensuring environmental protection measures are incorporated in clean-up activities • Rehabilitate any areas that are contaminated following an emergency and implement emergency procedures to protect people, the environment and property on the project and communities • Environmental & Social Manager has responsibility for the social and environmental management, compliance, and performance of the Vares Project.
Coordinator for Social Management	<ul style="list-style-type: none"> • Responsible for ensuring that activities related to engaging and working with local communities is conducted in accordance with relevant procedures and requirements for stakeholder engagement and community assistance.
Environmental and Social Management Associate	<ul style="list-style-type: none"> • Make available spill kits with required response team that are trained to deploy and control spills
Individual Responsibilities	<ul style="list-style-type: none"> • All ADRIATIC METALS workers have responsibility for: <ul style="list-style-type: none"> ✓ <i>Immediately reporting an incident to the site supervisor</i> ✓ <i>Attending any emergency response training that they are invited to attend</i> ✓ <i>Using appropriate equipment in an emergency; and</i> ✓ <i>Cooperating with the incident investigation process.</i> ✓ <i>Report any incident to ADRIATIC METALS HSE Team immediately</i>

The Emergency Response Manager in conjunction with the Health and Safety Manager will be responsible for implementing the EPRP and ultimately the General Managers will be responsible for enforcing its requirements. The ultimate responsibility for up-to-date emergency training plans lies with the Emergency Response Manager.

The Emergency Response and Health and Safety Manager, in consultation with the General Manager or designate will review the emergency preparedness and response procedures on a regular basis. Review of the emergency response procedures will include the periodic verification of any telephone number contacts for the various organizations or other communication methods that may be needed. Such verification will be undertaken at a minimum of once per year. Revisions will be made to the procedures where necessary to comply with changing site conditions and any new relevant legislation. Personnel will be notified of any changes and if necessary, retraining will take place.

During any emergency or crisis, the Emergency Response Manager will assume control of the situation and is responsible for maintaining the emergency response team resources at peak performance to adequately respond to emergency situations. The Emergency Response Manager main duties and responsibilities are to:

- Control emergency scene and oversee all rescue and emergency response situations;
- Hold and lead regular training sessions with the emergency response team;
- Ensure adequate maintenance of facilities and equipment for rescue situation;
- Regularly tour the site to keep informed and updated on physical conditions of the site's infrastructure and roads;
- Conduct and /or lead regular inspections of the emergency response equipment and vehicles to ensure good work conditions;
- Conduct regular inspections related to the fire prevention plan;
- Maintain regular contacts with contractor's emergency response leaders and external emergency officials;
- Prepare and share emergency evacuation plans and update ERP's as required;
- Maintain a high level of awareness of the emergency response plans and systems for the mine;
- Attend and support incident investigation meetings, as requested; and
- Manage the drills and exercises and conduct reviews to identify areas in need of improvement.

The Emergency Response Team (ERT) is formed from a team of suitable workers and activated by the Incident Commander as per the requirements of each specific emergency. There will be separate ERT teams at both mine and plant and for all foreseeable emergencies (example Medical ERT, Environmental ERT, Security ERT). Incidents on the haul road will, like all other emergencies, be handled within the framework of the Incident Command System. The ERT

Leader will be designated by the Incident Commander and a rostering maintained. All members of the ERT have the following responsibilities:

- to ensure that they are aware of their emergency response tasks;
- to maintain an appropriate level of physical and mental state by attending any training or exercise that is organized for the ERT;
- to look after any emergency response equipment that has been issued to them; and
- communicate back to the Incident Commander and ensure that they are fully apprised of each situation

The Health and Safety Manager is responsible for providing health and safety advice during an emergency if requested by the Incident Commander. He/she will form part of the General Staff of the Incident Command and be responsible for, amongst other things:

- Managing/coordinating the response to major environmental emergencies and incidents;
- Ensuring that all employees and contractors undergo environmental and health and safety inductions;
- Preparation of risk assessments. Review and update of the mine's accident and emergency plans, to comply with the requirements of applicable legislation;
- Managing debriefing of emergency response to identify lessons learnt that can be incorporated in the emergency response process;
- Leading accident/incident investigations;
- In consultation with GM Operations, give final classification of incident/accidents
- Providing Safety data sheets for any hazardous or dangerous goods involved in the emergency as requested;
- Providing advice regarding appropriate PPE;
- Ensuring appropriate records and documentation maintained for all areas of work;
- Ensuring adequate training and awareness of departmental staff to implement this plan;
- Establishing emergency equipment requirements that are to be available at the project sites;
- Ensuring emergency equipment is regularly inspected;
- After an incident, inspecting the operations and ensuring health and safety measures are incorporated in follow-up activities;
- Planning annual internal audits of the mine's emergency prevention and response arrangements as defined by this plan;
- Monitoring compliance with procedure and develop training and auditing tools that will raise awareness;
- Developing the annual drill and training plan (scenarios, frequency) and,
- Reporting the outcomes to the General Manager.

The Coordinator for Social Management reports directly to the Environmental & Social

Manager and manages the social component of the ESMP, stakeholder engagement and all local related issues. The Coordinator for Social Management also manages the community grievance procedure. He/she provides input to strategic planning, providing social sector technical input and insights to the implementation of the corporate responsibility and social strategy. The Coordinator for Social Management functions include:

- Implementation and maintenance of the stakeholder engagement plan (SEP) and log (information meetings, public consultations, community meetings, other meetings, stakeholder contacts);
- Oversight of community health, safety and security;
- Oversight and compliance checking of contractors' activities where there is interaction with local communities;
- Managing the grievance mechanism and database;
- Supervising the Vares Information Centre; and
- Participating in any emergency response in the event that an accident or emergency occurs and involves social issues.

3.3 APPLICATION

This procedure is applicable to all employees, contractors and subcontractors on the Vares Project. Contractors will be required to develop methods and controls that mitigate the potential environmental and social impacts caused by emergencies, including equipment and resources as necessary to meet the requirements within this procedure. Control is to be accomplished by identifying risks, evaluating and prioritizing the risks according to the required response and significance of potential impacts; then taking effective measures to design and implement appropriate controls. This procedure applies to all Mine areas, including the site offices and railhead that may be involved in an emergency and is intended to ensure that the Project is adequately prepared to respond to any emergency during the construction phase.

This procedure covers the following areas:

- Vares Plant site, TSF and offices;
- Rupice mine;
- Haul Road;
- Rail head load out;
- Vares Information Centre.

4.0 Emergency Preparedness and Response Plan

This EPRP is designed to ensure the protection of human health, company's assets and the environment adjacent to the mine site and infrastructure, along the haul road and at the plant site, from emergency situations that might arise from Project activities (onsite and offsite) during the construction, operations and decommissioning phases of the Project. The EPRP outlines the responsibilities of ADRIATIC METALS, its contractors and employees for emergency preparedness planning and response procedures. It provides a reference document that can be used for emergencies as a result of the Project activities and outlines the steps to be taken if an emergency occurs. Specifically, the Plan aims to:

- Protect people, assets and the environment from incidents and emergencies;
- Ensure that Project is carried out in conformance with safety, maintenance support and administrative requirements following an emergency or any serious incident;
- Ensure that interruptions at Project-related locations do not result in major performance loss;
- Identify the designated personnel and responsibilities for dealing with on- and off-site emergencies; and
- Minimize the impacts of incidents and accidents on and out of the mine site.

ADRIATIC METALS recognizes that it is necessary to collaborate with local communities and government authorities to develop appropriate emergency safeguards because the Project will introduce new activities to a post-industrial and rural setting that have the potential to develop into emergency incidents.

The EPRP is expected to be modified as the Project progresses and as activities focus in different areas. This current version is focused mainly on the pre-construction and construction phases of the Project, as based on the description in the ESHIA. Revision and refinement may be necessary to align the EPRP with the Project Execution Plan (PEP), once it is available.

Related Documents

- Community Health, Safety and Security Management Plan
- Traffic Management Plan
- Hazardous Management Plan
- Hazardous Materials Management Plan

Definitions

Term	Definition
Accident	An undesired event that results in harm to people or the environment, damage to property, or production loss.

Term	Definition
Crisis	An unstable or crucial time or state of affairs in which a decisive change is impending, especially: one with the distinct possibility of a highly undesirable outcome.
Emergency	An accidental situation that could have/has resulted in serious adverse effects on the health and/or safety of persons or the environment. An emergency may be the result of human-induced or natural occurrences including, but not limited to, fires, explosions, threats (including terrorism threats), vehicle failures, storms, floods, and earthquakes. Emergencies may originate from Project activities (e.g. road accident, purposeful or accidental disobedience of Project rules, inadequacy of Project Plans), natural events (e.g. earthquakes, high rainfall/flooding, landslides), or social events (e.g. vandalism, attacks, sabotage).
Emergency Response	A detailed program of action to control and/or minimize the effects of an emergency requiring prompt corrective measures beyond normal procedures to protect human life, minimize injury, minimize damage to the environment, and optimize loss control.
Hazard	An event or situation with the potential for human injury, damage to property, damage to the process, damage to the environment or some combination thereof.
Hazardous materials	These are materials that have the potential to cause damage to persons or the environment and goods that have their handling, transport, or use regulated by national and/or international regulations. They include explosives, compressed and liquefied gases, flammable and combustible materials, oxidizing materials and organic peroxides, poisonous or infectious substances, radioactive substances, and corrosives.
EBRD	European Bank for Reconstruction and Development.
Incident	An event, which could or does result in unintended harm or damage.
Incident Commander	The management person who initiates the emergency response system and is in control of the accident/incident scene.
Material Safety Data Sheet (MSDS)	An information package for a chemical, chemical compound or other hazardous material that outlines the nature of the material, the hazards of the material, proper handling procedures and first aid treatment.
Near Miss	An event having the likely potential that, under slightly different circumstances, could result in an actual injury to persons, damage to mine equipment / materials / environments.
Response	A set of procedures designed to guide the actions of personnel during an emergency situation.
Risk	The potential of a specific, undesired event occurring within a specific period or in specified circumstances. It may be either the frequency or the probability of a specific undesired event occurring.
Risk Analysis	The identification of undesired events that lead to the materialization of a hazard, the analysis of the mechanisms by which these undesired events could occur, and an estimate of the extent, magnitude, and likelihood of any harmful effects.
Risk Assessment	The quantitative evaluation of the likelihood of undesired events occurring and the likelihood of harm or damage being caused by them, together with the value judgments made concerning the significance of the results.

Abbreviations

Abbreviations are provided in the table below:

Term	Definition
ADRIATIC METALS	Adriatic Metals Limited
APELL	Awareness and Preparedness for Emergencies at Local Level

Term	Definition
EPRP	Emergency Preparedness and Response Plan
ESHIA	Environmental, Social and Health Impact Assessment
ESMP	Environmental and Social Management Plan
MP	Management Plan
OHSMP	Occupational Health & Safety Management Plan
PEP	Project Execution Plan
PROJECT	The Vares project (polymetallic mining project)
PR	Performance Requirements (of EBRD)
SEP	Stakeholder Engagement Plan
SOPs	Standard Operating Procedures
ESMS	Environmental and Social Management System

4.1 BACKGROUND AND CONTEXT

This Emergency Preparedness and Response Plan (EPRP) has been developed for preparing for and responding to major injuries, entrapment, major accidents, minor injuries, minor accidents, natural disasters, unplanned ignition or explosion, security emergencies, releases/spills of hazardous materials, fires, earthquakes, and corresponding media coverage of the Vares Project.

There are two distinct aspects to emergency response planning:

- the first addresses incidents 'inside the fence' which may have a direct impact on construction and/or operations, the second relates to incidents which have the potential to affect the environment and communities outside the site boundary.
- In the context of the Vares Project, this second category of incidents generally relate to transport of goods and materials, including ore and tailings, to and from the mine and plant, but may also relate to spills.

During implementation of the EPRP, the project Risk Register will be developed to identify the two categories of incidents (some may fall into both) and a plan for the consultative process with potentially affected communities and stakeholders will be drawn up as a subsidiary document to this EPRP. This is further described below (Other Requirements /Recommendations) and the outline of the process is set out in Appendix 1.



Figure 4.1 – Emergency Response Priorities

It covers the following types of emergencies:

- an incident resulting in fatality;
- an incident resulting in major injuries;
- fire, bushfire and/or explosion;
- weather/climate;
- hazardous chemical/oil spill on water or land;
- rescue from height/depth or confined space;
- vehicle/equipment accident;
- terrorism/violence threat;
- building evacuation;
- earthquake;
- haul road or public road; and
- river/watercourse incident.

The EPRP is triggered when an incident (i.e., accident, fire, spill, personal injury, etc.) occurs that is beyond the control of the personnel currently at the scene. Normal departmental procedures should be followed during any incident until it is determined that the situation is beyond the control of the personnel on the scene, or the normal departmental procedures have broken down or are unavailable. At this point the appropriate ERP should be invoked. The emergency response procedures and the personnel and department responsibilities presented here apply to all types of emergency situations that may develop at the mine site, on the road, or any other areas related to the Mine. Figure 4. shows the ADRIATIC METALS preparedness cycle. The same model is used for the overall EPRP as well as specific ERPs.



Figure 4.2 – ADRIATIC METALS Preparedness Cycle

Implementation of this plan is intended to mitigate or protect ADRIATIC METALS personnel, assets and the surrounding communities from injury; prevent contamination of surrounding

surface and ground waters with hazardous materials; prevent damage to the environment and in particular fauna and flora; provide fire-fighting procedures and describe other emergency response procedures that may be required at the site.

The objectives of the plan are to ensure that best practice is implemented to reduce impacts and that the Project complies with all national legislation, EBRD standards and international best practices. As such, this plan has the following specific goals:

- to establish the emergency organization structure, responsibilities, support and communication routes both within the company and with communities;
- to identify all potential incident and emergency scenarios and to ensure that suitable and sufficient precautions are established and maintained in order to prevent the occurrence of such incidents and their consequences;
- provide adequate resources, including trained ADRIATIC METALS and contractor personnel to deal with all foreseeable situations;
- guide and coordinate emergency response actions to ensure they are efficient and effective and provide Standard Operating Procedures (SOPs) for these actions;
- ensure adequate emergency response equipment is in place; and
- investigate incidents and improve emergency response procedures.

This plan will cover all in-country construction and project phase activities including those undertaken at ADRIATIC METALS sites, storage locations and access roads as well as the underground mine and the plant and tailings storage facility. Potential accidents or incidents that could occur as a result of the Project are included in the Project Risk Register, which will be updated prior to construction. The plan will continually develop with the Project and will be subject to an annual review. The responses described in the Project Risk Register will be updated as required and reviewed annually along with this plan.

4.2 RISKS IDENTIFIED

A Risk Assessment processes undertaken as part of the Feasibility Study by Ausenco has identified specific risks which require the Project to be prepared for and to have response plans in place. This process will be repeated during the Front-End Engineering Design (FEED) phase with a particular focus on environmental and community issues. Initially, Procedures will be developed for the following:

- Flooding and excessive erosion;
- Extreme Weather;
- Road incident or road obstruction;
- Community safety due to heavy machinery movements;
- Community unrest; and
- Fire, bushfires.

Additional impacts addressed in the EPRP include on-site and off-site emergencies related to the following emergency scenarios:

- Medical Emergencies (cardiovascular, trauma, vector borne disease etc);
- Medical emergency secondary to animal bites such as snake envenomation, rabies;
- Contagious diseases epidemic (including Covid-19);
- Mining and processing emergency incidents requiring extraction and/or medical care;
- Earthquake;
- Landslip;
- Explosion;
- Spillage of hazardous or potentially hazardous materials;
- Criminal, sabotage or arson attack;
- Security emergency;
- Geopolitical emergency;
- Interruption to telecommunications system;
- Interruption/failure of power supply; and/or potable water supply
- Access roads closed.

4.3 Emergency Preparedness and Prevention

Community involvement in emergency preparedness (APELL Process)

ADRIATIC METALS is committed to a prevention strategy of on-going maintenance, inventory control, staff training, community awareness and vigilance of all aspects of the work. It is the responsibility of all environmental and safety staff to follow the emergency preparedness and prevention requirements.

Once ADRIATIC METALS has developed a sufficient understanding of its own internal capacity, resources, competencies, risks and requirements in terms of EPRP, the company will proceed with the external process which incorporates the community and communications elements of the Plan. The external steps focus on providing information to external stakeholders on the potential hazards identified and measures taken to reduce risks associated with living in close proximity to a mine, review and update the EPR for the local area, increase the mine's involvement in community awareness and EPR planning, integration of the mine and community plans and involvement of communities in developing, testing and implementing the plans.

ADRIATIC METALS, through the Coordinator for Social Management and/or the Environmental and Social Manager, will provide information to local communities and authorities on ADRIATIC METALS's strategy for emergency preparedness and response through the provision of information particularly in the areas of:

- Transport accidents;
- Natural disasters;
- Health and wellbeing; and
- Road safety and traffic awareness.

This external communication process has been based on the ten-step APELL¹ communication tool as shown in appendix 1.

Level of Emergency Response

The Incident Commander will assess and determine the level of response required. The following serves as a guide to emergency response levels.

Level 1 <u>Incident</u>	<p>Any occurrence directly associated with ADRIATIC METALS operations, or services, which results, or could result, in harm to people, damage to property or the environment or wider loss of control which requires an immediate response to mitigate any escalation.</p> <p>Site level response is generally all that will be required.</p>
Level 2 <u>Emergency</u>	<p>An issue or event that arises internally or from external sources which may adversely affect life, property, assets environment or stakeholders. It is likely to incur liability; affect business continuity; and/ or infer reputational damage.</p> <p>It will require management intervention to rectify.</p>
Level 3 <u>Crisis</u>	<p>Any liability issue that threatens the future operations, commercial position or survivability of ADRIATIC METALS. Crises can be triggered by an event or by an issue, which is beyond the capacity or capability of existing Emergency Management arrangements. Crises may involve all or a substantial part of the Company and have major actual or potential long-term consequences.</p> <p>It will force a firm focus on ensuring business continuity, reducing liability and maintaining the Company's image and reputation.</p> <p>Crisis situations require responses that are primarily strategic in nature, with a focus on 'Hot Issue' Management. They can often be difficult to identify, and they can escalate very rapidly. They will almost always involve media interest on a national/ international scale, and they will frequently be driven by perceptions rather than facts.</p>

As appropriate, specific procedures and responsibilities will be developed with regards to each significant risk scenario for:

- Detecting incidents and raising the alarm;
- Evacuating personnel to predetermined points of safety and provision of emergency first aid treatment;
- Systematic and safe shut-down of operations during incidents;
- Designation of a central incident control location for major incidents;

¹ APELL for Mining (UNEP) 2001, Good Practice in Emergency Preparedness and Response (UNEP/ICMM) 2005

- Containment / control of hazardous materials / situations;
- Search and rescue;
- The removal and/or protection of vital equipment, materials and documents;
- All clear and re-entry procedure;
- Contacts with the authorities, the media and, as appropriate, with the local community (e.g. provision of counselling or other support for any casualties and their families).
- Fire prevention
- Medical emergencies.

Specific Plans

Site specific Plans will be developed. These plans form the basis of the Emergency Response:

- Medical Emergencies: underground and on surface
 - CASEVAC
 - MEDEVAC
- Security Emergencies
- Missing persons
- Environmental Emergencies
- Mine Rescue
- Fire Emergencies
- Infrastructure Emergency
- Major Power Failure
- Major Potable Water Failure
- Additional Plans as project requirements change.

Each of these plans will be governed by their respective Project and Site Plans. For example, the MEDEVAC plan will be governed by the Project Medical Plan as well as the Site-Specific Medical Plan:



Figure 4.3 – Project and Site Plan Structure

Emergency Response Team

In certain cases the dispatcher will immediately activate a specific ERT. In the specific case of a medical emergency the Dispatcher will activate the Medical ERT without first referring to the ERM.

ERT can be activated by the Incident Coordinator if an immediate response is required (examples would be medical, fire, chemical spill). Once the IC established his EMT, further ERT are activated after consultation and advice from the General Staff. No ERT shall self-activate and all personnel not delegated to the response should leave the area so as not to overburden the Command System.

The guiding principle: each individual involved in incident management reports to and takes direction from only one person.

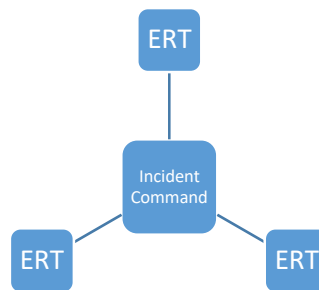


Figure 4.4 – Emergency Response Teams

Specific Emergency Response Team Accountability

Accountability starts as soon as the ERT is activated and the team members have checked in.

The ERT is accountable for:

- Conducting Response actions safely in accordance with the Incident Action Plan as provided by the IC;
- Implementing strategies and develop tactics to achieve the incident objectives as set by the IC;
- Providing timely and accurate feedback and information concerning ongoing operations and achievements;
- Personal accountability for safety and efforts towards the achievement of Incident objectives;

The ERT Leader is specifically accountable for:

- Directing the management of all tactical activities on behalf of the Incident Commander;
- Adequately supervise and control their subordinates;
- Recording and reporting resource status and requirements;
- Communications with the Incident Command (but can be delegated);

The phases of Emergency Management can be described as: Mitigation, Prevention, Preparation, Response and Recovery. With this in mind, the clean-up and decontamination are part of the Recovery phase and continue to be a part of the Incident Command activities. The IC will adapt the modular organisation as required to be as efficient as possible in this phase. Consequently, ERT will normally stand down and Recovery Teams tasked with the next IAP objectives.



Figure 4.5 – Phases of Emergency Management

Hazardous materials

The following activities and procedures will be standard practice for working with all hazardous materials:

Inventory control: All hazardous materials will be subject to strict inventory control from the time they depart the port of site to the time they reach their destination. Logs will be kept as required for inspection by the regulatory agencies;

All hazardous materials transported will have an MSDS accompanying the product. These MSDS will be available in Bosnian and English.

Storage: All transport containers will be suitable for the hazardous materials to be transported as set out in the manufactures' MSDS.

Staff Reminders: Pre-Job meetings/safety meetings will contain a component to constantly remind employees to look out for ways to improve environmental and safety performances.

Spill Kits: regularly maintained spill kits in trucks carrying hazardous materials will be available along with suitable communications equipment for haulage contractors in Guinea.

Ore Stockpile Area

At the ore stockpile area there are two elements of risk that could require emergency provision, namely the exit of solid ore or reactive waste rock material from the platform and the failure of the water treatment plant.

Any solid material that exits the confines of the platform onto the surrounding slopes will be excavated, either manually or mechanically and placed back within the original site intended for its storage. Any material that enters the stream courses will be removed, manually in the case of blocky material, and for finer material using a sand/gravel pump of the type used by alluvial gold miners. The area of actual failure of the platform will also be repaired immediately to prevent any further exit of solid material into the environment.

In the event of failure of the active water treatment plant, a passive back-up treatment facility is to be put in place for temporary use while repairs are made to the active system. This passive system is to take the form of a limestone drain down-stream from the active water treatment plant, constructed before mine start-up but not put into operation until specifically needed. An HDPE-lined ditch is to be filled with gravel-sized crushed Jurassic limestone, to be sourced from the immediate project geology, and any acidic run-off is to be fed through this ditch to neutralize acidity. The necessary test-work is to be carried out to prove the efficacy of this passive treatment method to neutralize the effluent chemistry expected and to optimize the length and gradient of the limestone channel. The channel is to be constructed in aerobic as opposed to anoxic format to facilitate easy replacement of the limestone gravel as and when required. The limestone channel is to be left 'off circuit', i.e. unused, while the active water treatment plant is operational, and will only be placed online in times of un-optimal operation of the active system, to ensure long-term effectiveness and availability of the back-up passive treatment option.

TMF

At the TMF site there are two elements of that could require emergency provision, namely the exit of solid tailings material from the platform and the failure of the water capture and return system.

Any solid material that exits the confines of the TMF onto the surrounding slopes will be excavated, either manually or mechanically and placed back within the original site intended for its storage. Any material that enters the stream courses will be removed, using a sand/gravel pump of the type used by alluvial gold miners (does anybody know the official name for this sort of equipment? The area of actual failure within the TMF will also be repaired immediately to prevent any further exit of solid material into the environment.

In the event of failure of the impacted water capture and return system, a passive back-up treatment facility is to be put in place for temporary use while repairs are made to the recirculation system. This passive system is to take the form of a limestone drain down-stream from the TMF, constructed before mine start-up but not put into operation until specifically needed. An HDPE-lined ditch is to be filled with gravel-sized crushed limey material to be

sourced from the immediate project geology, and any acidic run-off is to be fed through this ditch to neutralize acidity. There are two choices as to suitable material here; 1) the immediately surrounding bedrock geology comprises limey shales, mudstones and sandstones 2) the pure Jurassic limestone around the ore stockpile platform. The necessary test-work is to be carried out to evaluate the efficacy both materials and of the overall passive treatment method to neutralize the effluent chemistry expected and to optimize the length and gradient of the limestone channel. The channel is to be constructed in aerobic as opposed to anoxic format to facilitate easy replacement of the limestone gravel as and when required. The limestone channel is to be left 'off circuit', i.e. unused, while the active water treatment plant is operational, and will only be placed online in times of un-optimal operation of the active system, to ensure long-term effectiveness and availability of the back-up passive treatment option.

Haul Road Close to River Courses

Trucks containing ore and tailings will be moving back and forward along the haul road all the way through the operational life of the mine. A risk exists that a driving error results in a loaded truck leaving the road and entering the river. There is a specific part of the haul road that runs along a river course that is upstream of the Kakanj drinking water supply area that is of particular concern here.

GPS-controlled speed limiters will be installed in the trucks to limit speeds to 20km/hr over this section of the road, to minimize the risk of driver error. In the event that a truck enters the river, the action plan would be;

- 1) Empty the truck of all fuel, coolant and lubricant by the most appropriate means
- 2) Any material that is lying on the ground but not in the river will be removed manually
- 3) Any material that has entered the river will be removed using a sand/gravel pump of the sort used by alluvial gold miners.

Paste Plant

The paste plant will continually be handling tailings materials delivered from Tisovci by truck. There is a small risk that some of this tailings material could depart the plant site and enter the environment, on the land surface downslope or the stream courses further downslope. Any tailings materials that end up on the slopes will be removed, either manually or mechanically. Materials that enter the stream courses will be removed using a sand/gravel pump of the sort used by alluvial gold miners.

In the event of a natural disaster or severe weather causing damage to a facility and possibly requiring evacuation, the Duty Manager assumes the position of On-Scene Coordinator. All site employees must follow the Manager's (or designated person's) directions through the emergency broadcast system or other means.

Site/Area Evacuation (Emergency)

Site evacuation will be under the control of the Duty Manager (or designate). A site-wide notification and alarm system will be established. A general evacuation will go into effect upon the sounding of an alarm at any or all of the buildings and facilities on site. The Evacuation Plan may be triggered automatically by fire or gas detectors or manually by an individual or site management upon awareness that an incident requires evacuation.

Muster stations will be established clearly around the project area and site personnel will have been made aware of them during orientation and follow-up training programs. Primary evacuation from the various Project areas and mine sites will be by road.

Head Count/Search and rescue

ADRIATIC METALS will develop a Headcount/Presence system to track the people presence on site and ensure all people present are accounted for and/or are in a known location.

Each department shall have a daily presence list of their personnel. In case of an evacuation, these lists will be used to perform a headcount at the muster point or in a remote shelter, or before evacuating a site, building, area.

If someone is missing, the Incident Commander will be informed as soon as possible. The search and rescue will be initiated by the Incident Commander on advice from On Scene Coordinator and/or ERT Supervisor, and/or H&S Manager. General Manager will be informed in case of missing person.

Shelter

On the mine site, plant site and other operational sites, buildings and/or other structures will be identified as shelter in case of an incident needing to regroup people (with or without an evacuation) for a certain period.

Crisis Management and business resilience

As part of the Emergency Management System, a detailed crisis management plan and process will be developed for both mine and plant sites.

Emergency and Crisis Response organisation is divided into three levels:

Strategic: Crisis Management Team (**CMT**). Cheltenham.

Tactical: Emergency Management Team (**EMT**). Vares Processing plant.

Operational: Emergency Response Team (**ERT**). Incident site.

Within this structure, ADRIATIC METALS personnel will be responding to emergencies (or controlling planned events) in a coordinated, multisectoral way, ensuring that all the available resources are used efficiently.

Crisis level will be evaluated as per a colour coded system. A specific room will be dedicated as "Command Centre" and will be equipped with all the communication and other equipment's necessary to monitor the crisis or incident.

The Objectives of Crisis Management is to Protect assets, save lives while protecting the environment and pursuing business continuity together with the community and other stakeholders.

In order to achieve this we must have in place:

- Operational readiness to respond to emergencies;
- Resilient Emergency Response System; and
- Communal project-wide approach, acknowledging the environmental and community context.

In the event of a critical incident, ADRIATIC METALS must be able to:

- Immediately respond and manage the incident in a manner that demonstrates commitment to the saving of life and minimising impact to people, the environment, assets and reputation.
- Provide effective support to staff, contractors, and the community.
- Demonstrate that the Company is a caring and responsible organisation.
- Provide reliable information by establishing and maintaining effective communications with company divisions, media, government and community groups.
- Ensure other business areas are maintained, or stopped, dependent on the incident and corporate process.
- Implement processes that allow the business to return to normal business after the incident.
-

Crisis Management Team (CMT)

The Crisis Management Team may be activated by the General Manager in response to a crisis or as a consequence of an emergency; or it may convene for a crisis, which has no underlying emergency event. Its focus is on strategic issues, which affect future operations, profitability and reputation. It can operate in Strategic Management of Emergencies (SMOE) mode through supporting the EMT in performing some key functions that may be handed off by the EMT to the CMT for ownership.

Recognising an Emergency or Crisis

An emergency is any abnormal event, which demands immediate attention, usually by adopting a team approach to Line Management. It is any unplanned event, which results in the temporary loss of management control but where functional resources can manage the response. Most emergencies do not result in a crisis.

A crisis is any business continuity, reputation or liability issue that threatens the commercial position or survivability of the company. Crises can be triggered by an event or by an issue, and they are any turning point, which falls outside normal business contingency and Emergency Response arrangements. Crises may involve all or a substantial part of the company, and have major actual or potential long-term consequences.

Crisis situations require responses that are primarily strategic in nature, with a focus on *Hot Issues Management*. They can sometimes be difficult to identify, can escalate very rapidly, will almost always involve media interest on a substantial scale, and they will frequently be driven by perceptions rather than facts.

CMT Composition

The CMT is drawn from the Corporate structure and consists of the General Manager, direct reports, all other staff on call as advisers, log keepers and telephone Responders.

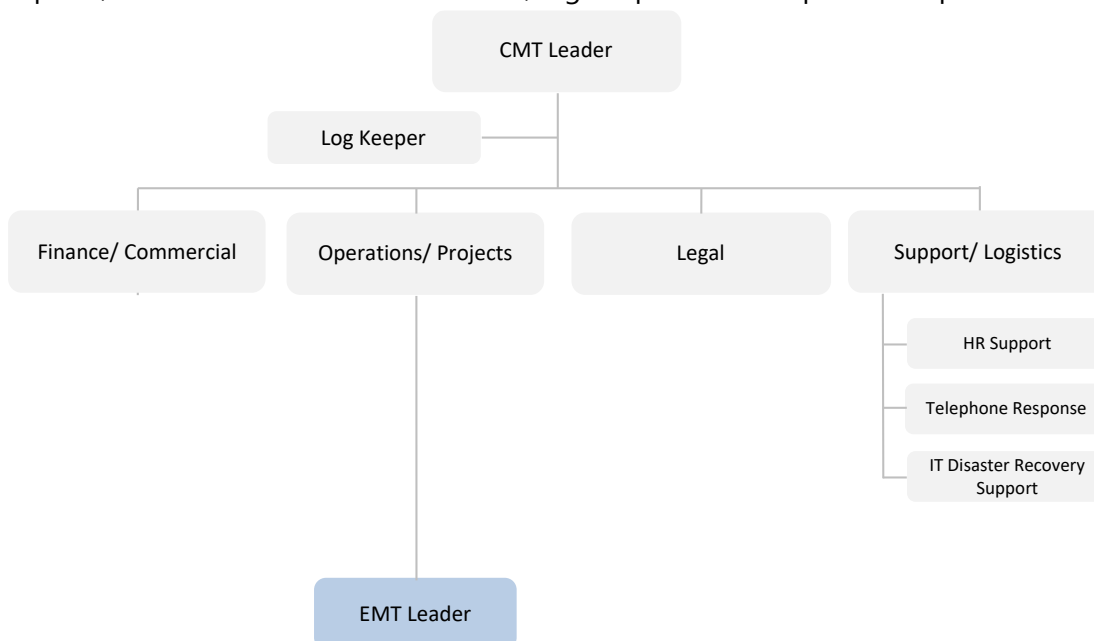


Figure 4.6– Crisis Management Team

Project Evacuation (Crisis)

A detailed evacuation plan will be developed for both mine and plant sites, including offices, and the Information Centre in Vares. The Health and Safety Manager will be responsible to develop and implement the Evacuation Plans, and ensure proper equipment, procedures and training are provided to effectively support the process.

Evacuation order will be given by the General Manager in conjunction with the Crisis Management Team.



Figure 4.7 – Response Teams and Functions

First Aid and Medical Emergencies

Site Medical Emergencies

A Medical Emergency and Evacuation Plan (**MEEP**) form part of the Emergency Response Structure.

To facilitate medical evacuations, ADRIATIC METALS projects engage well equipped and highly trained medical professionals (see medical plan for qualification standards) that, in this context, are assigned to:

- Provide Basic Life Support;
- Provide Advanced (Trauma, Cardiac or other) Life Support;
- Stabilisation, preparation for the next appropriate level of care;
- Triage and Medical Authority; and
- Medical Escort.

The Medical Emergency and Evacuation Plan aim to ensure that no time is lost in initiating the best possible medical care of seriously injured or sick personnel while ensuring in parallel that all relevant personnel are kept informed of the situation

The MEEP details medical facility classifications, emergency response procedures, patient classification and the Course of Action for Evacuation. The plan identifies the main role players and establish authority, responsibilities and accountability.

Medical Facilities (full details in MEEP)

Level 1 Clinic: The first level where a physician's availability is assured.

Level 2 Clinic/Hospital: A Level 2 is the next level of medical care in this Plan. It has Level 1 capabilities, which are augmented by surgical and intensive care expertise and facilities.

Level 3 Hospital: Level 3 medical facility represents a fully equipped hospital, incorporating all lower echelon medical care capabilities.

Response Procedure (full details in MEEP)

Distinguish between primary and secondary evacuations:

CASEVAC: is a primary evacuation and entails the urgent medical support and movement of a seriously injured or sick person(s) from the site where the injury/illness occurred or from a location to where the person(s) has been subsequently moved, to the first and usually closest appropriate medical facility, utilizing the most appropriate available means.

MEDEVAC: is a secondary evacuation and entails the movement of a patient between two recognized medical facilities, usually involving the movement of a patient to a more capable and/or specialized medical facility.

Medical evacuations are initiated by the **Requestor**. Requestor can be either a member of the site medical team or a designated person. The Requestor has certain responsibilities in addition to making the initial request.

Medical Emergency Coordinator (MEC): the MEC is designated by the Emergency Response Manager as the focal point for the collation, dissemination and execution of external medical evacuations.

Guiding Principles FOR MEDEVAC (Detailed in MEEP)

The following principles for all CASEVAC/MEDEVAC procedures:

Means of evacuation: Priority 1 and 2 patients would primarily be evacuated by air.

Routine (non-emergency) evacuations: Requested by the site Senior Medical Officer (CMO), responsible for assigning the level of priority to mitigate a patient's condition from deteriorating further.

Non-project personnel casualties: Non-project Priority 1 and 2 casualties may be evacuated by ADRIATIC METALS assets if appropriate. Specific reference to people affected by ADRIATIC METALS or contractor activities (for example where an ADRIATIC METALS vehicle is involved in a road accident with pedestrians). Guidance as per "Traumatic injury with the possibility of long-term disability or death."

Patients with contagious diseases: Subject to a CMO recommendation, General Manager approval (and based on the medical risk evaluation), the evacuation of patients with contagious diseases or when there is a risk of serious infection will be recommended through a special flight, equipped with specialized medical personnel and equipment. Personal Protection Equipment (PPE) and/or any other appropriate measures will be used to ensure protection of crew, medical personnel, and ADRIATIC METALS property.

Reverse Procedure: These guiding principles applies if there is an emergency requirement to deploy Medical professionals to the location of the casualty/patient rather than transferring the patients.

Follow Up and Closure (detailed in MEEP)

All MEDEVAC/CASEVAC cased must be reported in the electronic clinical database. Medical reports to be submitted to the MEC within 24 hours of evacuation:

In all cases, detailed description of (reasons for) approval or denial of MEDEVAC recommendations should be fully documented and kept on permanent record.

In all cases, an After-Action Meeting must be held and documented. Recommendations on improvements must be made and the Medical Evacuation Plan considered for amendment to reflect most recent experience.

Basic Life Support

Basic first aid training will be provided to all staff, contractors and consultants by their respective employers. At least one member of each working team must be a qualified first-aid. Each working team must be equipped with the appropriate level first aid kit. In the case of medical emergencies, the Medical Emergency Response Plan will be implemented as illustrated in

Figure .

The Project will initially outsource the medical and emergency services to an internationally recognised contract service provider as part of the construction phase of the project. Once operations commence, an emergency response team may be recruited to provide in-house emergency response services with the intent of being self-sufficient and non-reliant on outside services.

Detailed medical training for emergency response staff will be provided by the medical services contractor and arranged specialist contractors. Project locations will be equipped with in-house resources and equipment to respond to emergencies, including asset and life-threatening events, with dedicated teams located at the mine and the port. Emergency management, including incident management, reporting and training will be provided to selected staff and contractor personnel.

A medical services contractor will provide resources and equipment to operate medical facilities at the port terminal and mine site. Services will be limited to workplace health and safety issues and workplace injury rehabilitation.

The medical services contractor will provide occupational health and lifestyle training to Project employees and contractors. Training will include developing education programs to promote the health and safety of all employees and contractors as well as to ensure that the Project, including camp accommodation and meals, meets internationally recognised standards.

In terms of national health care provision, there are national hospitals located in Zenica and Sarajevo, along with a number of private clinics. The closest (quickest transport time on best roads) urgent medical centre is in Vares, which is administratively connected to Zenica hospital, where patients get transported from Vares in urgent transport vehicles.

Medical Emergencies among Local Communities

Non-project Priority 1 and 2 casualties may be evacuated by ADRIATIC METALS assets if appropriate. Specific reference to people affected by ADRIATIC METALS or contractor activities (for example where an ADRIATIC METALS vehicle is involved in a road accident with pedestrians). Clinical guidance as per "Traumatic injury with the possibility of long-term disability or death."

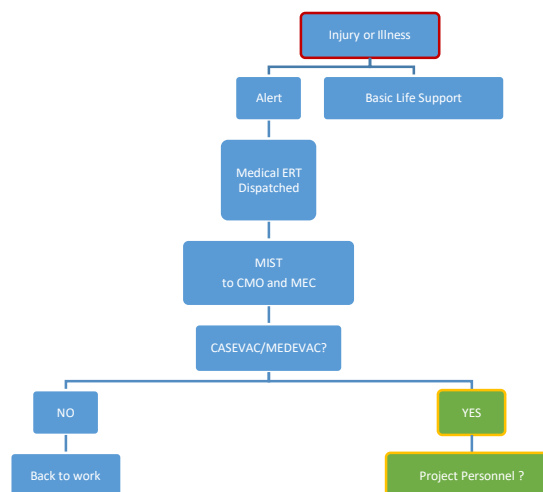


Figure 4.8 – Medical Emergency Response Procedure

SECURITY EMERGENCIES

Security Emergencies are addressed within the framework of the Crisis and Emergency Response System and with specific reference to the Security Policy, Strategy, Project Security Management Plan and Site-Specific Security Plans. In the event of a security emergency within the local area the following procedures will be implemented:

The General Manager will announce a security emergency and an “emergency stand down” will be implemented and all workers and contractors will withdraw to secured sites (such as the offices and processing plant) and await further instructions.

The General Manger will liaise with government, law enforcement and security force representatives to determine the nature and likely duration of the security emergency and an event-specific action plan will be prepared and implemented. This may include, but not be limited to a range of actions such as:

- Resumption of normal working activities;
- Increasing site security and security of in-bound and out-bound transportation;
- Evacuation of non-essential personnel and placement of operations on care and maintenance until the temporary security emergency is resolved.

Human Rights

The project will, to the extent possible, establish that security personnel have not participated in past human rights abuse, have been appropriately trained in the use of force and conduct towards workers and the local community, and require them to act within the applicable law. The Project will investigate any credible allegations of unlawful behaviour or acts of abuse by security personnel which are reported such allegations to ADRIATIC METALS. Action will be

taken to prevent reoccurrence and ongoing training on Human Rights will be required for all security personnel.

The guard force will have clear instructions and training will be provided on the procedures and policies for the use of force. ADRIATIC METALS and the Security Services Provider will fully comply with the following codes outlining the respect of human rights:

- International Code of Conduct for Private Security Service Providers
- The Universal Declaration of Human Rights
- The Voluntary Principles on Security and Human Rights
- The Global Compact Principles (Principles 1 and 2)
- Code of Conduct for Law Enforcement Officials

Security staff will adhere to these in all their duties without exception. Personnel must be extensively trained in this regard. ADRIATIC METALS personnel, contractors and members of the community must be encouraged to share concerns about human rights abuses with Security Department management. For this purpose, a grievance mechanism should be instituted allowing the affected community to express concerns about the security arrangements and acts of security personnel.

Fire Prevention, Preparedness and Response

Fire prevention and protection is intended to guide workers on effective fire protection during mining and transport activities. The following requirements and activities are considered the minimum requirements for fire prevention and protection:

- Selection and use of portable fire extinguishers;
- Providing, maintaining, checking and inspecting fire extinguishers and other fire control devices;
- The segregation of non-compatible materials;
- Providing and maintaining adequate access into storage areas and other facilities;
- General housekeeping and the disposal of waste and other debris;
- The hazardous materials stores will not be allowed to accumulate unnecessary combustible materials.
- Solid waste will be removed at regular intervals;
- Metal bins with close-fittings lids will be provided for oily rags, wood shavings, and other highly combustible wastes;
- Control of vegetation or other developments which may have vulnerability to fire;
- Fuel storage in appropriate containers;
- Providing and maintaining fire warning signs as necessary;
- Clear instruction to the personnel for fire protection and prevention;
- Instruction and training on the use of fire extinguishers;
- Electrical equipment should be checked regularly for defects;
- Smoking is prohibited in or near vehicles, or any working areas/sites;
- Open fires and/or burning of materials are strictly prohibited;

- Proper bonding and grounding techniques will be used for any operation where static electricity could become an ignition source;
- MSDS will be available for all kind of dangerous products (including flammable). The MSDS will describe which type of fire extinguisher must be used in case of a fire;
- Adequate availability of first-aid firefighting equipment in order to suppress/contain fire spread in the event of any outbreak of fire at any point on or adjacent to the site under his control;
- Prompt warning of an outbreak of fire will be advised to personnel in accordance with the EPRP; and
- Establishment of an ERT to respond to any fires.

ADRIATIC METALS will ensure that all statutory provisions administered by local authorities and which may be in force from time to time in relation to bush fire danger are complied with and will liaise with the local authorities. Notwithstanding any other requirement, ADRIATIC METALS will ensure that every vehicle and item of construction plant is fitted with a fire extinguisher.

5.0 INSPECTIONS AND MONITORING

An inspection and audit program will be developed by ADRIATIC METALS and contractors to ensure that emergency preparedness and response procedures are being followed.

Regular EPRP monitoring and reporting will be undertaken via the monthly EHS Report that will be prepared and submitted to the General Manager. Reporting will include:

- A summary of activities undertaken during the reporting period;
- Any deviations or non-compliances to the EPRP;
- Planned activities during the next reporting period; and
- Any other issues of concern.

Emergency Preparedness Monitoring

For Emergency Preparedness, each of the following monitoring plans is to be tested annually and plans are to be reviewed every six months by the Project and crisis management teams.

- Tools and Equipment Inspections
- Portable electric tools will be given a preventive maintenance inspection at least once every 3 months.
- Portable air compressors will be checked monthly for internal flammable sludge build-up, along with other listed inspection items.
- Oily rags and papers will not be allowed to accumulate on equipment or in operator's cab and enclosures.
- Gas welding equipment will be checked for leaks prior to each use by the user. Hose pressure will be bled off when equipment is temporarily out of operation.
- Temporary heaters, internal combustion engines, and other heat producing equipment will be adequately supervised and maintained.

Material Inspections

All flammable material received on the job will be reported to the appropriate supervision for proper storage. The Environment and Safety Manager will be consulted on questions concerning flammable materials.

Stored flammables and combustible materials will be checked for fire hazards at least once each week.

Fuel cans used for petroleum products will be approved safety cans and will have the upper part and top painted red to identify them. These cans will only be used for petroleum products, and petroleum products will not be placed in unmarked cans.

Drums, cans and other flammable liquids containers will be tightly closed, except when being filled or emptied.

Work Area Inspections

A system of periodic fire prevention inspections will be set up. The frequency of such inspections will be determined by the specific site characteristics and/or task requirements.

A fire prevention inspection checklist will be used as a guide for determining the extent of the inspection to ensure consistent and thorough monitoring of affected work areas.

Field supervisors will be responsible for housekeeping control to prevent the excess accumulation of trash and other combustibles.

Foremen will inspect work areas prior to the start of heat producing work. All fire hazards will be eliminated or protected before the work starts. All necessary permits will be obtained prior to the start of work.

All work, where there may be an accumulation of hazardous gases or vapours from cleaning, spray painting, and use of adhesives, will be free of ignition sources.

Foremen will check their work areas at the end of their workday. Special attention will be given to welding and burning areas, smoking areas, housekeeping, and access route clearances. They will also check on machine and equipment shutdown, and flammable storage areas.

Plant supervisors will make a fire check at the close of each shift, inspecting for gas leaks, equipment shutdown, and cigarette disposal. Oily rags will be placed in closed metal containers.

Ashtrays, wastebaskets, storerooms, oily mops, and office machinery are sources of fires and will be emptied regularly.

Welders will be responsible for shutting off their equipment at the end of a workday. Welding and burning areas will where necessary be checked for a minimum of 30 minutes after the work has ceased.

Offices, canteens, cabins, will have a map with the location of the fire extinguishers and with escape routes.

Petroleum products, acetone and alcohol will not be used as a solvent for cleaning clothes, tools, equipment or exterior of buildings. Only approved solvents will be used for cleaning purposes.

Smoking and chewing tobacco is only allowed in designated areas.

Regular thorough inspections of the work areas and buildings to detect and eliminate fire hazards or the potential sources of fire.

Gasoline and diesel powered equipment should only be used in well-ventilated areas. Exhaust pipes should be kept away from combustible materials. Engines must be stopped before refuelling takes place.

Kitchen areas are a particular location for fire hazards and will be monitored to ensure that electrical fittings are being turned off after use and do not present a fire hazard.

Contractors must report the following to the ADRIATIC METALS HSE team:

- Audit and inspection results;
- Corrective actions; and
- Incidents as per procedure.

Fire Equipment Inspections

Fire equipment inspections will be the responsibility of the Health and Safety Manager.

An inspection schedule will be implemented, and the inspections will be carried on by the ERT as part of their duties.

Fire extinguishers will be inspected at least weekly to ensure that they are in operating readiness. Their general condition should be checked along with hoses, nozzles, seals, gauges, inspection cards, weight, location, and mounting brackets.

Stored pressure types and the cartridges of cartridge pressure models will be weighed at least once each year and subjected to a thorough maintenance inspection.

Hydrostatic tests will be made on dry chemical extinguishers every other year and on other types every year. The test pressure will be 75 % of the factory test pressure, which is noted on the nameplate. This testing should be undertaken by a suitably-qualified contractor, who will tag the extinguisher which has been hydrostatically tested indicating the date of the test each.

Vehicle Inspections

Vehicles will be given a preventive maintenance inspection at least once every 3 months.

Valves, pumps and pipe work on tankers will be checked monthly, along with other listed inspection items.

Emergency Incident Investigation and Reporting

During any emergency incident, documentation of the emergency begins with the initial report of the emergency by the first responder. Key persons keeping a log of the incident include the Security personnel taking the call, the Leader of the ERT, who immediately begins a log of the incident and of the emergency response at the scene. All of these documents, as well as others generated throughout the emergency, become part of the emergency record. In addition, emergencies must be investigated and documented, and corrective actions taken to ensure that such emergencies can be prevented in the future. Once the emergency is declared over by the ERT, the incident investigation process begins, under the direction of the Health and Safety manager, with the purpose of:

- Determining the root cause of the emergency;
- Determining if appropriate emergency response was taken;
- Determining if the Emergency Response Plan, emergency response organisation, and emergency response procedures were adequate or need to be modified;
- Determining corrective and preventative actions to prevent recurrence; and
- Documenting the incident and corrective actions.

Figure represents the Framework of the ADRIATIC METALS Emergency Response System.

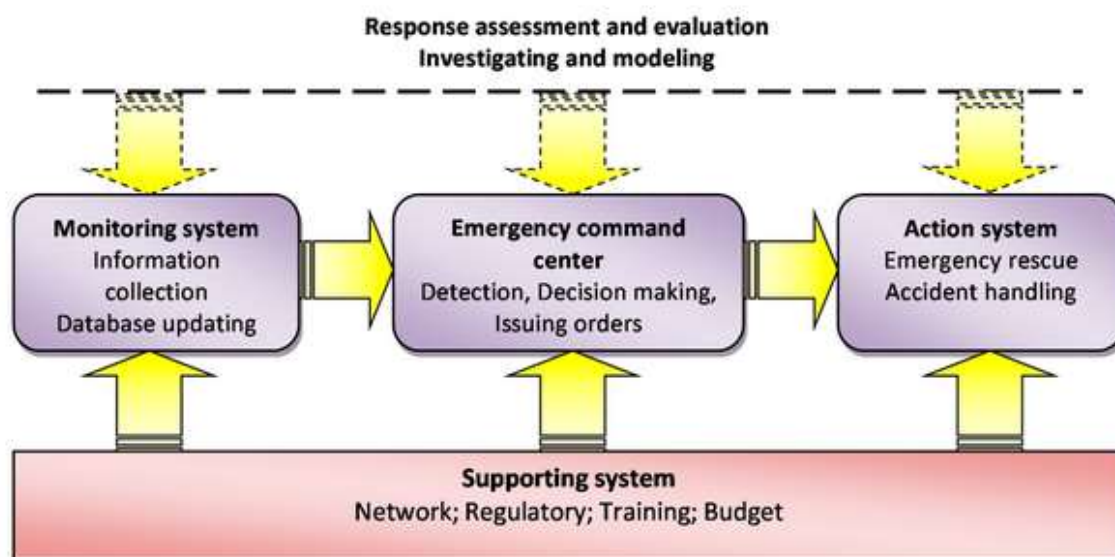


Figure 5.1 – ADRIATIC METALS Emergency Response System Framework

6.0 TRAINING

ADRIATIC METALS believes that comprehensive training in the use of emergency response equipment and personnel protection devices and tactics is necessary to ensure the best response possible. Competency in responding to emergency incidents requires a complete understanding of the roles and responsibilities of each person in the response team. Provision for training is an integral part of a complete contingency planning and implementation program.

Initial training must be followed by periodic updates to maintain familiarity with all aspects of the plan. As a minimum, all employees should receive training in the following areas:

- How to raise the alarm;
- How to report an incident;
- Medical emergency, accident or fatality;
- Fuel and lubricant spill or effluent spill or leak;
- Natural disasters;
- Missing persons; What immediate actions to take in the event of an incident (e.g. when to evacuate, when and how to intervene, what personal protective equipment to use; what systems to shut down, etc.); and
- Tackling a fire and use of portable fire extinguishers: If staff are expected to fight incipient fires or may have to escape through an area that might be affected by fire, they should be trained in use of extinguishers and their proper operation on particular types of fire (e.g., metals, electrical, chemical, wood, or paper). If not expected to tackle fire, they should simply evacuate.

The training for spill response will be part of the driver training. All drivers will be made aware of the products which will be transported and the MSDS. Supervisors who will fill the role of Spill Response Coordinator, the Spill response Supervisor and the Clean-up Crew will receive a more detailed training allowing them to respond quickly and safely to any spill on the site. Specified disaster response teams will receive additional training as well;

All employees on site will be aware of MSDS and will become familiar with those that are relevant to their activities, which may require ongoing training;

ADRIATIC METALS will ensure that all drivers are trained in the ADRIATIC METALS emergency response procedures, in particular the procedures following a road traffic accident, and basic techniques of first aid;

ADRIATIC METALS will also ensure appropriate specialized training for drivers carrying hazardous materials.

In addition, certain functions, such as the following, will require specific training for the employees involved:

- Emergency Response Teams, including any fire-fighters, first aiders and designated media contacts;
- Specialised Equipment: Some IT / machinery operations present fire loss exposures by their very nature; e.g. emergency generator and fuel tank, bottled gas appliances. Employees involved must be thoroughly trained in the fire risks and the control measures to be followed.
- Traffic Control: During a fire or other emergency, persons with essential duties must be able to direct staff and/or the public emergency services to locations where they are needed.
- Job Change: Training employees when they change jobs can be as important as induction for new staff.

Safety and environmental concerns and awareness will also be discussed at every safety meeting and at the start-up of any new operations that may affect the environment. If an incident happens all employees will be informed and re-instructed and retrained as deemed necessary.

Drills and Simulations

ADRIATIC METALS acknowledges that mock exercises or drills are important in developing employee and contractor skills and for evaluating the adequacy of contingencies plans and preparations in dealing with both environmental and health and safety concerns. The H&S Manager shall plan periodic simulation exercises or practice drills in regard to the identified potential incident and emergency scenarios. The first full emergency response drill, involving contractors, will be conducted within three months of mobilisation and incorporate lessons learned into the EPRP.

The objectives of drills and simulations include evaluation of the following:

- practicality of the plan (structure and organization);
- adequacy of communications and interactions among parties;

- emergency response procedure and equipment effectiveness in preventing or containing pollution and/or injuries;
- evacuation and personnel count procedures;
- adequacy of first aid and rescue procedures;
- adequacy of emergency personnel response and training; and
- public relations skills.

Drills will be conducted in various forms such as desktop, computer-synthesized and on-site practical exercises. Drills will be at pre-determined regular intervals, frequent enough to ensure that the response team maintains proficiency in all aspects of the contingency plan. Drills will be conducted in a variety of situations and it is desirable to include public emergency response organisations in them. The complexity of the drill may be increased as the incident response team gains proficiency.

Site personnel and drivers will undertake periodic testing of the emergency response procedures using mock drill scenarios. These tests will be undertaken on a twice-yearly basis. These intervals will be more frequent if there is a high turnover of employees. The outcome of each exercise will be recorded, and reviewed for areas of improvement by the responsible person for the respective area.

Media Statement

When asked by the media or members of the public, communities about an incident, only the Chief Executive Officer is authorized to talk to the media on behalf of the company. The following statement will be used:

"I can confirm that there has been an incident at(location) involving (you can name resources, but no names or personal details). I do not have more information at this point in time. Further information regarding this incident will be provided by the senior management when we have more details."

Recordkeeping

Recordkeeping (records will be kept for a minimum of 10 years), and will include the following:

- Incident reports;
- Completed audit and inspection forms;
- Monthly environmental reports;
- Monthly waste management reports;
- Waste trends on generation, reuse, recycling in tons and percentage graphs;
- Waste manifests;
- Waste transfer forms; and
- Corrective actions.

7.0 References

Global Standards and Other Standards	
IFC Performance Standards and Guidelines	The person who starts the change process
UNEP/ICMM	Good Practice in emergency Preparedness and Response
UNEP	Technical Report No: 41 APELL for Mining
BiH Legislation	<ul style="list-style-type: none"> •Environmental Protection Law ("Official Gazette of the Federation of BiH", No. 15/21) •Mining law ("Official Gazette of the Federation of BiH", No. 26/10) •Occupational safety law ("Official Gazette of the Federation of BiH", No. 79/20) •Fire protection and firefighting law ("Official Gazette of the Federation of BiH", No. 64/09)
ESHIA	Environmental Social and Health Impact Assessment for the project
ADRIATIC METALS ESMP	Environmental and Social Management Plan

Apell Communication Tool

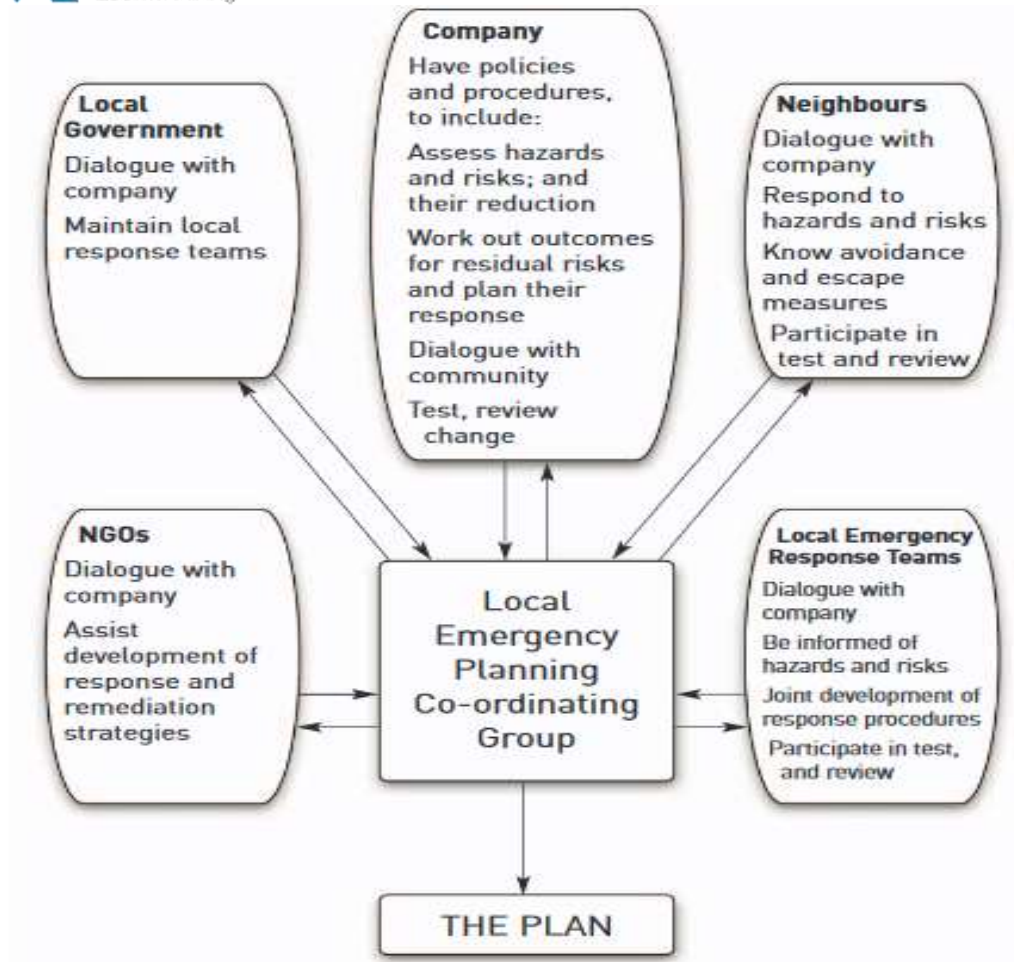
APELL is a tool for bringing people together to allow effective communication about risks and emergency response. The process of dialogue should help to reduce risk, improve effectiveness of response to accidents and allow ordinary people to react appropriately during emergencies.

APELL consists of a ten-step process for the development of an integrated and functional emergency response plan involving local communities, governments, emergency responders and others. This process creates awareness of hazards in communities close to industrial facilities, encourages risk reduction and mitigation, and develops preparedness for emergency response.

Communication is often between the three main groups of stakeholders - company, community, and local authorities. Discussion on hazards usually leads to the identification of risk reduction measures, thus making the area safer than before. Structured communication between emergency response bodies (public and company) results in a better-organized overall emergency response effort.

The ten steps are as follows:

- 1. Identify the emergency response participants and establish their roles, resources, and concerns.**
- 2. Evaluate the hazards and risks that may result in emergency situations in the community.**
- 3. Have participants review their own emergency response plans to ensure a co-ordinated response.**
- 4. Identify the required response tasks not covered by existing plans.**
- 5. Match these tasks to the resources of the identified participants.**
- 6. Make the changes necessary to improve existing plans, integrate them into an overall community plan, and gain agreement.**
- 7. Commit the integrated community plan to writing and obtain approval from local governments.**
- 8. Educate participating groups about the integrated plan and ensure that all emergency responders are trained.**
- 9. Establish procedures for periodic testing, review, and updating of the plan.**
- 10. Educate the community about the integrated plan.**



APELL Communication Framework

8.0 Training

Required number of training programs will be provided for the project personnel working with waste rocks, as well as the environmental team, and relevant subcontractors.

Regular internal inspections will be made to ensure that the mitigation measures indicated in this Plan are applied during project.

9.0 Review and Update

The results of monitoring will be reported to responsible parties to ensure that the project activities comply with the national legislation and international standards.

Depending on the monitoring results, Emergency Preparedness and Response Plan will be reviewed and updated when necessary.

Appendix 1

External communication process has been based on the ten-step APELL communication tool

External Communication Process	
Step 1	Identify the emergency response participants and establish their roles, resources and concerns.
Step 2	Evaluate the risks and hazards that may result in emergency situations in the community and define options for risk reduction.
Step 3	Have participants review their own emergency plan for adequacy relative to a coordinated response, including the adequacy of communication plans.
Step 4	Identify the required response tasks not covered by the existing plans.
Step 5	Match these tasks to the resources available from the identified participants.
Step 6	Make the changes necessary to improve existing plans, integrate them into an overall emergency response and communication plan and gain agreement.
Step 7	Commit the integrated plan to writing and obtain approvals from local governments.
Step 8	Communicate the integrated plan to participating groups and ensure that all emergency responders are trained.
Step 9	Establish procedures for periodic testing, review and updating of the plan.
Step 10	Communicate the integrated plan to the general community.

APELL for Mining will be referenced in preparing a strategy to manage incidents that have the potential to affect proximate stakeholders, including other industrial activity such as logging companies.

Awareness of Emergencies

A Health and Safety / Emergency Response Card will be prepared and provided to all workers, to be carried at all times. This will set out:

- Key policies and procedures;
- What to do in an emergency; and
- Key contacts and telephone numbers.

Contractors will have suitable communications equipment to enable ADRIATIC METALS to be immediately informed of, and react to, any incidents.

General Emergency Response Procedures

The Discoverer

The first person to discover an emergency is referred to as "The Discoverer". The Discoverer must raise the alarm. The alarm is raised by contacting the Emergency Response Control Room by either phoning the emergency telephone number or calling an emergency over the radio. A dedicated Emergency Radio frequency will be established.

Radio procedure: The Discoverer will call out on their current radio channel: "Code 1, Code 1, Code 1" and clearly state the nature and location of the emergency. The Discoverer will then change their radio to Channel [1] (Emergency Channel) and repeat "Code 1, Code 1, Code 1" and the nature and location of the emergency. The Discoverer will remain on Channel 1 and await response from the Emergency Responder.

Telephone Procedure: The Discoverer will call the emergency number and clearly state "Code 1, Code 1, Code 1" and then clearly state the nature and location of the emergency. Ensure that the information is repeated back to the Discoverer. He will then stay on line until told to hang up after confirming his contact number.

In all circumstances, be prepared to provide the following information:

- Your name and telephone number you are calling from;
- Your location;
- Exact place of accident;
- What has happened;
- How many casualties; and
- What injuries.

The Immediate Actions Drill

The Discoverer should ensure the following actions:

- Assess the Scene for nature of accident and safety;
- Sound the Alarm and provide adequate information;
- Making safe of any unsafe situations (example: shut off power);
- Assess victims;
- Respond to Life threatening injuries (Blood loss, airways, breathing, CPR, AED);
- Respond to non-life-threatening injuries; and
- Hand over to ERT.

All personnel designated to an Emergency Response Team (ERT) or Emergency Management Team (EMT) must immediately monitor radio and or telephone broadcast and be ready to respond an activation call.

EMT members must immediately report to the Incident Coordination Centre.

Emergency Response Control

A 24/7 Emergency Response Control Room will be designated and equipped with phones and radios.

The Control Room will be staffed by trained personnel, called Emergency Dispatchers (**ED**), tasked with the gathering of information related to emergencies, the provision of assistance and instructions by voice and the notification of the relevant Emergency Response Team.

ED will assess the incoming call and situation by:

Asking the 'W' questions:

- Where is the Accident/incident?
- Who is involved (How Many)?
- What happened?
- When did it happen?
- What has been done so far?
- Why did it happen?

Record all relevant details of the emergency in a Log

- Time of Reported Accident/incident
- Caller's Name
- Location of Caller
- Phone/contact number
- 'Nature of Accident/incident'
- 'Location and History' details

Begin immediate notifications:

As per SOP:

- Site medical personnel (always)
- Emergency Response Manager (ERM)
- The ERT Leader as indicated by the ERM
- Any other personnel as indicated by the Emergency Response Manager (for example Incident Commander)
- National Emergency Services as required.

The Emergency Response Manager (ERM)

The ERM will mobilize to the scene and, after being briefed on any developments, will assume control of the scene and direct the response of all personnel at the scene. Activate additional ERT as immediately required to control the situation (example Medical ERT, Security ERT, HSE ERT, Environmental ERT). After the ERM has provided direction for the response effort, he/she will appoint an appropriate ERT member to act as Team Captain and to assume control of the scene. The ERM will then report to the Incident Control Centre (ICC) to brief the Incident Commander (IC).

Incident Commander

The Incident Commander will immediately report to the ICC when a Code 1 incident has been initiated. The IC will be responsible for communicating the nature and extent of any emergency to the Crisis Management Team if required (in the event of a Crisis). The IC will continue to assemble his Command System structure as required by the nature and extent of the incident.

All Other Site Personnel

All site personnel that are not directly involved in ERT efforts will cease work, unless the cessation of their work could result in an emergency situation or directed to continue by the IC. Radio Silence will be observed unless unsafe to do so. This until "All Clear" is given by the IC (or delegate).

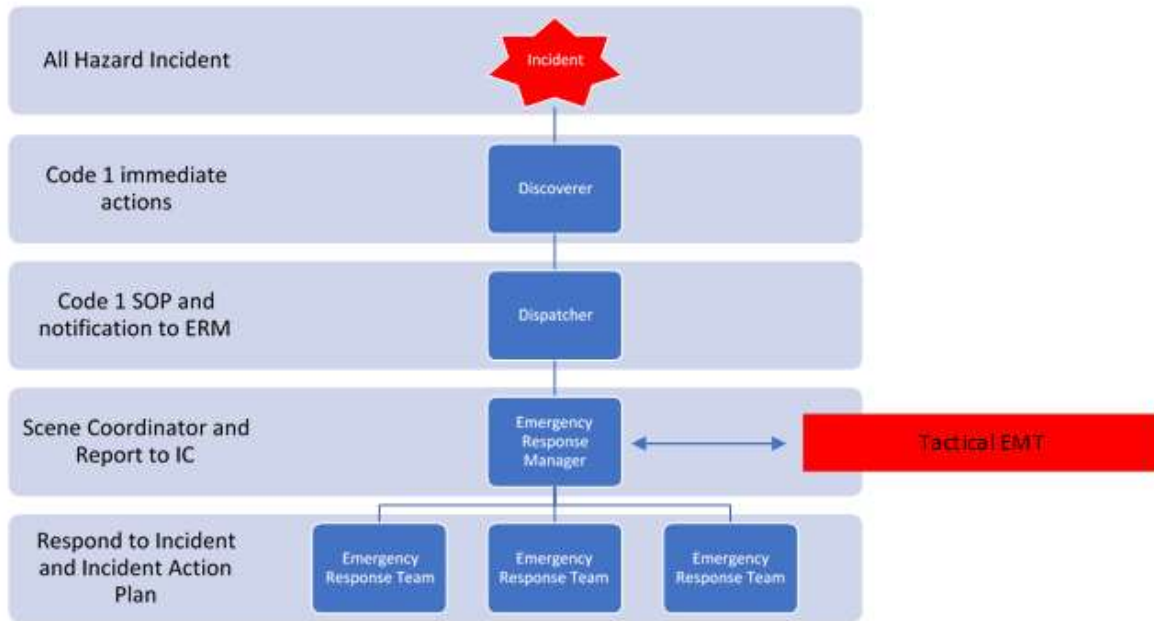


Figure A.1 – Basic Response Procedure

Tactical EMT

Incident Commander Compose the Command Staff as required to adequately address the specific response. These staff members advise and assist the IC in managing the Operational teams. The structure is modular and scalable and only relevant units are activated. In a small incident, the IC fulfil all the functions.

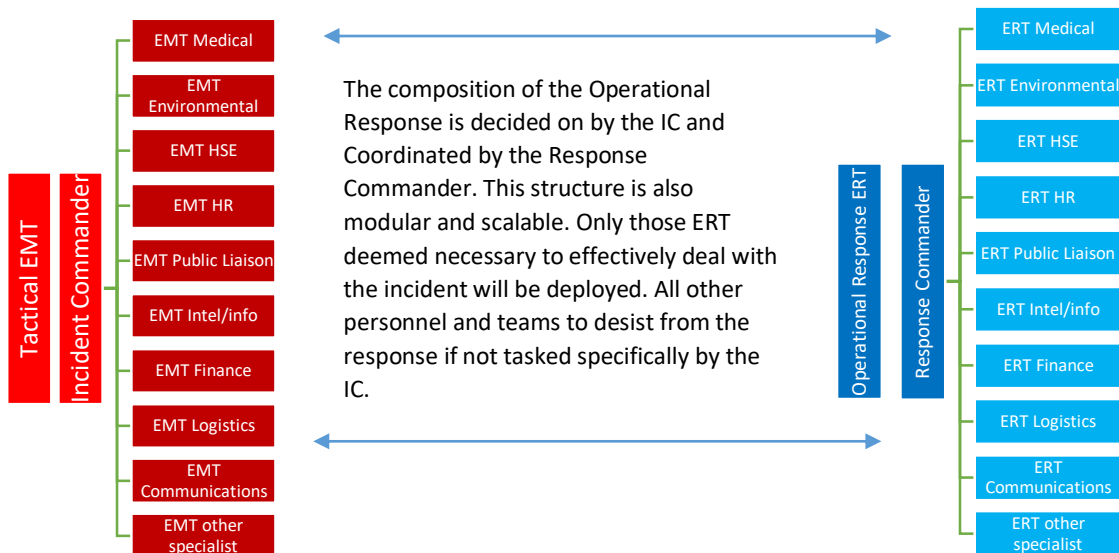


Figure A.2 – Operational Response Procedure

Transfer of Command and Accountability

Transfer of Command and Accountability

It often becomes necessary for the Team Leader or the entire ERT to be relieved:

- More advanced or specialized resource required;
- Fatigue;
- Nature of Emergency change;
- State agency taking over;
- Command decision;

It is best to transfer at the end of an operational period. When the transfer takes place, the process should include a briefing capturing essential information to continue safe and effective operations.

Incident Action Planning

Response operations must be coordinated as outlined in the Incident Action Plan (**IAP**). The IAP must be developed within the first hour of the Response. The IAP can be either oral or written, containing the objectives established by the Incident Commander. Tactics, resources and support are all elements of the IAP, working towards a common goal. To be effective, an IAP should:

- Cover a specified timeframe
- Be proactive
- Specify the incident objectives
- State the activities to be completed
- Assign responsibilities
- Identify needed resources
- Specify communication protocols

For smaller/less complex incidents, the IAP may be oral or written. Some incidents for example Hazardous materials incidents might require a written IAP as directed by the relevant safety standards.

IAP must answer the following four questions:

- What do we want to do?
- Who is responsible for doing it?
- How do we communicate with each other?
- What is the procedure if someone is injured?

Standard IAP forms will be designed for specific incidents.

Typically, the ERT will remain in control until the emergency is determined to be over, i.e., medical response to all injured persons is complete, fires are out, spills are stopped and contained, any other situation prompting the emergency is under full control, and the chance

of a recurring emergency is deemed minimal. The Leader of each ERT will advise the IC, who will make the determination whether the emergency is over and the "All-Clear" can be issued. Once the emergency has been declared to be over, the typical ERT's actions will include:

- Documentation of the incident;
- Initiation of the emergency incident investigation, reporting, and record keeping;
- Initiation of clean-up which will be the responsibility of the Safety and Environment Department who will also develop a clean-up plan with the involvement of the ERT;
- Immediately provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from the incident;
- Follow-up communication with outside emergency response personnel including notification to any outside agencies or emergency response personnel which were notified during the emergency that operations are about to resume; and
- Ensure that all emergency equipment is cleaned or replaced, and is fit for use before operations are resumed.