



**ADRIATIC METALS PLC**  
**VARES PROJECT**  
**CONTRACTOR ENVIRONMENTAL MANAGMENT PLAN**  
  
**OCTOBER 2021**

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CONTRACTOR ENVIRONMENTAL MANAGEMENT PLAN

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Revision	Date	Authors	Reviewed	Pages
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## INTRODUCTION

### 1.0 Purpose and Scope

Eastern Mining d.o.o. is owned and operated by Adriatic Metals PLC 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). The ultimate goal is to revive the mining industry in the municipality of Vareš, by exploiting new and existing ore deposits. 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.

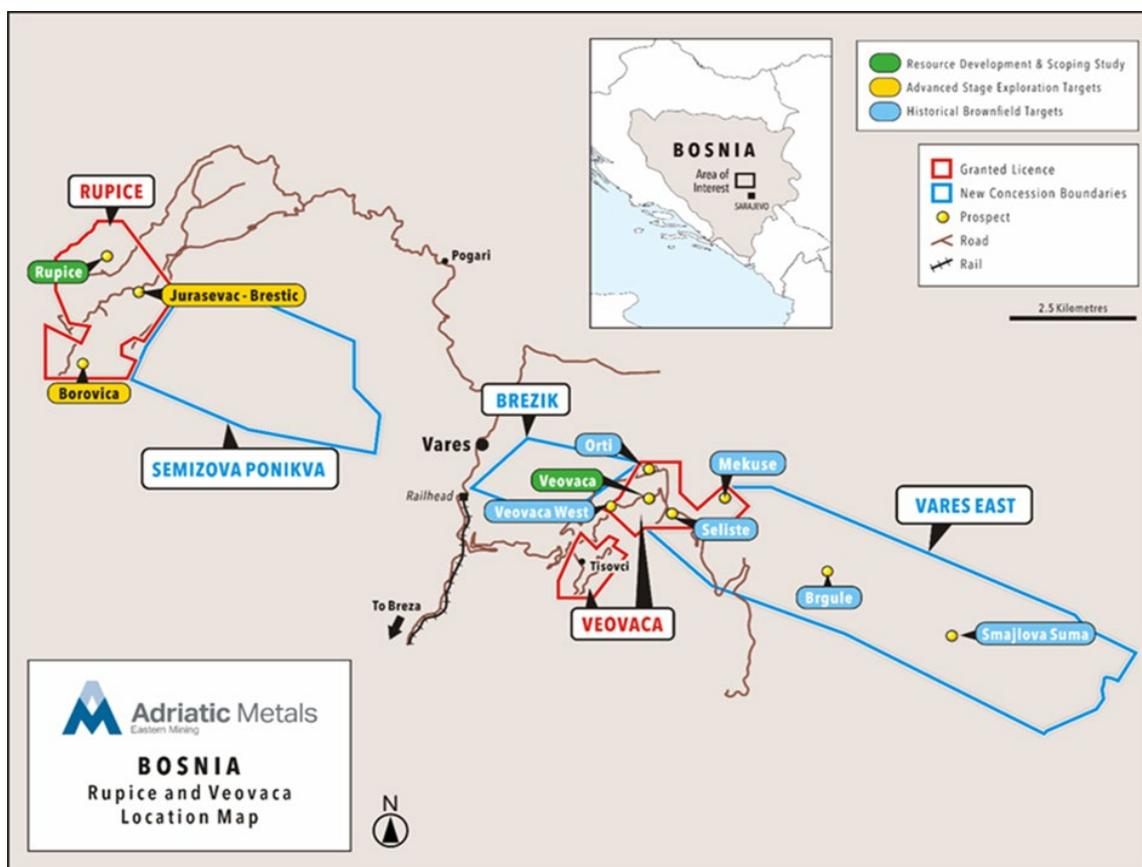


Figure 1.1. Map showing the location of the Vares Project

The primary objective of this Contractor Environmental Management Plan (CEMP) is to avoid, mitigate and minimise environmental and social impacts associated with construction activities of the Rupice Project in line with industry best practice and to provide a vehicle for implementation of various mitigation activities identified in the project Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP).

This overarching CEMP provides guidance on the environmental and social management system approach to be adopted by ADT, its Contractor(s), and sub-contractors during the construction phase of the Project. It is supplemented by various sub-plans and procedures

which have been developed to address key environmental and social aspects identified during the ESIA process for which detailed control procedures and associated responsibilities are defined for implementation by ADT and its contractors. These environmental and social sub-plans have been prepared as separate stand-alone documents and they form part of the Environmental and Social Management System (ESMS).

The process set out within this overarching CEMP, along with the accompanying sub-plans form the basis of the Environmental and Social Management System (ESMS) to be implemented by ADT, its Contractor(s) and their sub-contractors during the construction phase of the Project.

It is the responsibility of ADT to implement the requirements of the CEMP and sub-plans throughout the construction phase and to monitor the performance of its Contractor(s) to ensure they meet the appropriate CEMP requirements. The Contractor(s) are responsible for developing and implementing their own management plans or procedures in line with the requirements of the CEMP and sub-plans as part of their own Environmental and Social Management System and Health and Safety Management System.

The CEMP will be applicable to all activities undertaken during the construction phase of the Project and summarised in Figure 1.1 below.



### 1.1 Distribution and review

ADT will distribute controlled copies of this CEMP to all Contractor(s) for implementation.

A controlled copy of the CEMP will be held centrally within ADT's main office in Tisovci.

The CEMP will be reviewed at least every 6 months by ADT and upon any major change in project activity to ensure that the scope of requirements and responsibilities contained within the plan are applicable and sufficiently addressed.

## 1.1 Introduction

This overarching CEMP defines the overall environmental and social management system approach for the Project construction phase. As an integral part of the overall Project Environmental and Social Management System, the CEMP enables environmental and social requirements to be identified, planned, achieved, maintained, documented and when possible, improved.

This CEMP defines the environmental objectives for the Project, describes ADT and its Contractor's responsibilities regarding environmental management, and provides guidance on a consistent approach for managing environmental and social aspects and impacts during the construction phase.

- The CEMP takes into account the following:
- The size and complexity of the Project scope of work;
- All applicable laws, statutes and regulations;
- All applicable international requirements, including the International Finance Corporation (IFC)
- Performance Standards on Social and Environmental Sustainability;
- Mitigation requirements as set out in the Project ESIA and ESMP;
- ADT environmental and third party interfaces;
- The risk factors that may be faced during the construction of the Project; and
- The principle of continuous improvement in environmental and social performance.

## 1.2 Environmental and Social Management System Framework

An Environmental and Social Management System (ESMS) establishes what an organisation needs to do in order to meet its environmental, economic and social goals and responsibilities. This CEMP details the ADT ESMS Framework which is organised into a distinct staged process:

- **Policy** – AGL documented commitment related to environmental and social performance;
- **Planning** - Developing performance criteria (objectives and targets) for environmental management and developing responsibilities, strategies, and plans and procedures to meet defined objectives;
- **Implementation** - Implementing the sub-plans and procedures, training employees and contractors, and maintaining records to demonstrate that the system is working;
- **Checking / Corrective Action** - Monitoring the implementation of the sub-plans and procedures to ensure that they are effective and updating components of the ESMS, as needed, when operations, personnel, risks or requirements change; and

- **Management Review** – Regular ADT management team review of Project environmental and social performance.

The following sub-sections outline how each of these ESMS steps will be implemented by ADT and its Contractor(s) during the construction phase of the Project, indicating as necessary where further details of associated requirements are defined within the CEMP.

### *2.2.1 ADT Environmental and Social Policies*

This policy sets out our commitments and responsibilities as a developer to achieve environmental and social sustainability in our projects. ADT believes that sustainable development is a fundamental aspect of sound business practice and adds value to its activities by working for long-term sustainability through effective environmental and social management. ADT is committed to the principles of corporate transparency, accountability and stakeholder engagement.

ADT prioritises environmental and social issues such as climate change mitigation and adaptation, biodiversity conservation, energy and resource efficiency, promotion of decent work practices, reduction of social exclusion and access to basic services, gender equality and social development. Each project that ADT undertakes will be expected to provide benefits to project-affected communities.

ADT will, as a minimum:

- Meet or exceed all applicable national laws and regulations;
- Minimise environmental and social impacts and continually improve environmental and social performance as an integral part of our operating strategy;
- Respect our stakeholders, the environment and cultural heritage;
- Constructively engage with affected communities and other stakeholders and address complaints about any breach of these policies promptly;
- Ensure that employees and contractors understand these policies and conform to the high standards they require; and
- Intervene promptly in unsafe or non-compliant situations.

In addition, ADT will actively seek to:

- Ensure its activities adhere to good international industry practices in environmental, social and human resource management, including the EBRD Performance Requirements and IFC's Performance Standards and EHS Guidelines; and
- Contribute to effective implementation of relevant principles and codes of practice related to environment, labour, corporate responsibility and access to information.

## 1.3 Planning

### *2.3.1 Defining Project Impacts, Objectives and Management Plans/Procedures*

During the site preparation and construction phase there is the potential for environmental and social impacts to arise. Typical activities relevant to the construction phase will include amongst others environmental impacts associated with waste arising and disposal, fugitive dust, noise, effluent discharges potential chemical spills, ecological disturbance, erosion and traffic. In addition, suitable provisions are required to ensure good worker management relationships and conditions and to protect and enhance the quality of life for communities in the Project area.

The Project ESIA and ESMP identify the key environmental and social aspects and impacts associated with the construction phase of the Project, along with the required mitigation and monitoring measures to manage these impacts in line with national and international standards and requirements.

These ESIA and ESMP requirements, in addition to industry best practice measures, form the basis of the control measures and associated responsibilities defined within the CEMP and the associated management plans and procedures. Compliance of all Project construction activities with the requirements of the CEMP and associated management plans is a key Project objective. ADT is responsible for the monitoring and reporting of overall status of Project compliance with the CEMP and management plans throughout the construction phase through the adoption of key performance targets and indicators.

The Contractor(s) are responsible for developing and implementing their own management plans and / or procedures in line with the requirements the CEMP and management plans as part of their own Environmental and Social Management System, where required. All Contractor environmental and social implementation plans / procedures for each stage of the project will be completed and submitted to ADT as a minimum four weeks prior to commencement of activities to allow sufficient time for ADT review and approval of documents. Contractor method statements and work instructions will also form the basis to control site construction works. However, ADT recognises that some contractor and sub-contractor activities will not have the potential for significant environmental impacts so will screen these at procurement and contracting stage to flag key contract activities and avoid unnecessary work. Key performance aspects will however apply to all contractors and sub-contractors, for example health and safety, human resources, traffic management and community health, safety and security.

In order to achieve the ADT policy of continual improvement, Project objectives and performance targets will be reviewed and established at least every 6 months during the construction phase by ADT or as necessary upon any major change in Project activities or identification of any major non-compliance during the construction phase.

This plan overlaps with other management plans as follows:

- Health and Safety Management Plan;
- Human Resources Management Plan (Workforce operational Manual);
- Air Quality and GHG Management Plan;
- Noise and Vibration Management Plan;

- Traffic Management Plan;
- Soils, Contaminated Land and Erosion Control Management Plan;
- Hazardous Materials Management Plan;
- Waste and Hazardous Waste Management Plan;
- Surface Mineral Waste Disposal Plan;
- Cultural Heritage Management Plan with Chance Finds Procedure;
- Community, Health, Safety and Security Management Plan;
- Biodiversity Action Plan;
- Water and Waste-water Management Plan;
- Stakeholder Engagement Plan; and
- Emergency Preparedness and Response Plan.

### 1.4 Legal and Other Requirements

Identification of all legal and other requirements, which may impact Project construction phase activities, is a key step in the ESMS. The legal framework for the Project is outlined in Section 2 of this overarching CEMP. Any changes in the legal requirements will be monitored by ADT and Contractor(s) will be informed about these changes. It is also the responsibility of the Contractor(s) to monitor any changes in legal requirements as they relate to activities under their control and to adapt their management controls as necessary to address these changes.

The ADT Environmental Manager (please refer to Chapter 3 for description of ADT organisational structure and the various roles and responsibilities) has primary responsibility for tracking and documenting any applicable changes to national and international standards, as well as the identification and monitoring of environmental permission requirements, issued by regulators. The Environmental Manager should distribute summaries of these requirements and the potential applicability for each pending or proposed regulatory change on Project activities. The ADT Environmental and Social Manager and Project Director should review this information and direct feedback or questions to the Environmental Manager, as required.

ADT will continually monitor environmental performance during the construction phase to verify compliance with legal and other requirements. This will be included as a key performance indicator for the Project.

### 1.5 Change Management

To ensure that Project environmental and social impacts are identified and managed throughout the construction phase, environmental reviews shall be performed prior to the introduction of any new or modified process or activity that may have an impact on the environment or local communities. This review will be led by the Environmental Manager and / or Contractor(s) to identify whether any new environmental and social aspects would arise by the proposed change and if any additional mitigation measures are required in order to meet national and international standards. This review will be triggered by changes such as:

- The purchase of new materials or equipment;

- Process changes;
- Equipment and engineering re-designs; and
- Modification or introduction of new construction procedures.

### **Review and Update of CEMP Plans and Procedures**

The Environmental Manager will ensure that the CEMP and associated plans, procedures, and instructions are periodically reviewed to ensure that they remain current and effective. The Environmental Manager has the sole authority to issue new, or amend existing, management plans and procedures.

CEMP policies, plans and procedures will be reviewed at least every 6 months, or prior to any major change in Project activities.

## **2.0 Legislative Requirements and Standards**

Eastern Mining 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)
- Law on Environmental Protection of Zenica - Doboje Canton ("Official Gazette of the FBiH", no. 1/00)
- Law on protection against noise ("Official Gazette of Federation BiH" No. 110/12)
- Law on protection against noise ("Official Gazette of Zenica-Doboje Canton" No. 01/14)
- Law on Waste Management ("Official Gazette of the Federation of BiH", No. 33/03, 72/09 and 92/17)
- Law on Chemicals ("Official Gazette of the Federation of BiH", No. 77/20)
- Law on roads of the FBiH ("Official Gazette of FBiH", No. 12/2010, 16/2010 - corrigendum and 66/2013")
- Rules on special conditions for transported motor vehicles ("Official Gazette of the Federation of BiH", no. 07/07")
- Law on road transport of the Federation of Bosnia and Herzegovina ("Official Gazette of FBiH, No. 28/06)
- Rules on traffic signs and signalling on roads, manner marking of works and obstacles on the road and signs that participants in traffic is given by an authorized person ("Official Gazette of FBiH", No. 12/2010, 16/2010 - corrigendum and 66/2013")
- Law on occupational safety ("Official Gazette of FBiH", No. 79/2020")
- Law on the transport of dangerous goods ("Official Gazette of SFRY", No. 27/90 and 45/90")
- Mining law ("Official Gazette of the Federation of BiH", No. 26/10)
- Fire protection and firefighting law ("Official Gazette of the Federation of BiH", No. 64/09)

- Law on Healthcare ("Official Gazette of the FBiH", no. 46/10 and 75/13)
- Law on Protection of the Population from Infectious Diseases ("Official Gazette of the FBiH", no. 29/05)
- Law on Radiation and Nuclear Safety in Bosnia and Herzegovina ("Official Gazette of BiH", no. 88/07)
- Law on the Environmental Protection Fund of the Federation of BiH ("Official Gazette of the FBiH", no. 33/03)
- Law on Air Protection ("Official Gazette of the Federation of BiH", No. 33/03 and 4/10)
- Law on Nature Protection ("Official Gazette of the Federation of BiH", No. 66/13)
- Law on water ("Official Gazette of the Federation of BiH", No. 70/06)
- Law on water ("Official Gazette of the ZDK", No. 17/07)
- Law on geological exploration ("Official Gazette of the Federation of BiH", No. 09/10 and 14/10)
- Contractual law of FBiH ("Official Gazette of the SFRY", No. 29/1978, 39/1985, 45/1989 - decision of the USJ and 57/1989, "Official Gazette of RBiH", No. 2/1992, 13/1993 and 13/1994 and "Official Gazette of FBiH", No. 29/2003 and 42/2011)
- Company law of FBiH ("Official Gazette of the Federation of BiH", No. 81/15)
- Law on health insurance ("Official Gazette of the Federation of BiH", No. 30/97, 7/02, 70/08, 48/11 and 36/18)
- Law on health insurance ("Official Gazette of the Zenicko-Dobojski canton No. 46/10 and 75/13)
- Law on pension and disability insurance ("Official Gazette of the Federation of BiH", No. 13/18)
- Other related sub laws, rulebooks and procedures, including all applicable internal procedures, policies and rulebooks.

## 2.2 International requirements

- European Bank for Reconstruction and Development (EBRD) PR 1
- European Bank for Reconstruction and Development (EBRD) PR 3
- European Bank for Reconstruction and Development (EBRD) Performance Requirement (PR) 4
- IFC PS1: Assessment and Management of Environmental and Social Risks and Impacts,
- IFC PS3: Resource Efficiency and Pollution Prevention,
- IFC PS4: Community Health, Safety, and Security,
- IFC General EHS Guidelines: 1.1 Air Emissions and Ambient Air Quality, April 30,2007
- IFC General EHS Guidelines: 1.7 Noise, April 30,2007
- IFC General EHS Guidelines: 3. Community Health and Safety, April 30,2007

## 2.3 Permit requirements

Two Environmental permits are obtained for Vares Project:

- Environmental Permit to the operator „Eastern Mining“ d.o.o., Tisovci, Vareš, for underground exploitation and obtaining complex lead, zinc and barite ore with accompanying mineral components in the „Rupice“ deposit, municipality of Vareš,

permit number: UPI 05/2-02-19-5-60/20 SC from 5th February 2021. from Federal Ministry of Environment and Tourism

- Environmental Permit to the operator „Eastern Mining“ d.o.o., Tisovci, Vareš, for the project of renewal of lead, zinc and barite ore exploitation and processing facility at the location of Veovača I - Tisovci I - Veovača II, permit number: UPI 05/2-23-11-195/19 from 20th May 2021. from Federal Ministry of Environment and Tourism

### 3.0 Roles and Responsibilities

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

Table 1. Roles and Responsibilities

Roles	Responsibilities
Executive Director	<ul style="list-style-type: none"> <li>• Ensure adequate resources are provided for implementation of this Plan.</li> <li>• Ensure the Plan is distributed to all relevant Contractors and subcontractors.</li> </ul>
Procurement Department	<ul style="list-style-type: none"> <li>• Tendering procedure and evaluation of received bids</li> <li>• Negotiation</li> </ul>
Legal and administration department	<ul style="list-style-type: none"> <li>• Prequalification and due diligence of contractors, including national permit requirements</li> <li>• Contract finalization</li> <li>• Contract management according to inputs from all involved departments</li> </ul>
Health and Safety manager	<ul style="list-style-type: none"> <li>• Supervision of H&amp;S aspects of contract</li> </ul>
Environmental and Social Manager	<ul style="list-style-type: none"> <li>• Supervision of E&amp;S aspects of contract</li> </ul>
Construction Manager	<ul style="list-style-type: none"> <li>• Supervision of construction works</li> </ul>
Mining engineers	<ul style="list-style-type: none"> <li>• Supervision of mining works</li> </ul>
All personnel	<ul style="list-style-type: none"> <li>• Participate in trainings required.</li> <li>• Ensure self-competency in terms of implementation of this plan.</li> </ul>

## 4.0 Contractor Environmental management

### 4.1 Implementation

The construction of the Rupice project is being planned in detail by ADT. This involves ensuring that the commitments to environmental and social standards and performance made in the ESIA and in local permit conditions are met. There are three key mechanisms for this:

**Contractual requirements** placed on contractors and sub-contractors by Eastern Mining or ADT. The ESG credentials, prior performance and preparedness of individual contractors are evaluated as part of the Procurement process which has been established for the project. Contract requirements will, *inter alia*, require contracting companies to have a functioning ESMS in place, and/or to develop a project specific Environmental and Social Management Plan, addressing that contractor's activities and their compliance with the ADT suite of ESG Policies, which cover Health and Safety, Human Resources, Climate Change, Procurement and Human Rights as well as Environment and Social Performance. Contractors will be responsible for ensuring that sub-contractors also carry out their activities in line with the same policy and project commitments.

**Training** of all Eastern Mining, contractor and sub-contractor staff will take place initially at site induction. This will have a specific ESG focus, and will be enhanced with specific topic and refresher training as required during the construction phase.

**Performance monitoring** during the construction phase is the third key mechanism for ensuring that the policy and project commitments are met. This will be implemented by regular meetings between Eastern Mining and contractors on ESG aspects, regular site inspections and observations and regular reporting by contractors to Eastern Mining. Environmental monitoring (surface and ground water flow and quality, air quality, dust, noise and vibration etc) will be routinely monitored by Eastern Mining's ESG team to complement visual inspections, which will verify aspects such as soil storage, footprint management, invasive species, hazardous materials management and waste management. Specific inspections and monitoring will be carried out in the case of stakeholder complaints regarding environmental and social performance of contractors and sub-contractors.

### 4.2 Specific areas and activities

The project construction has been divided into key physical areas, as follows, primarily for the purposes of developing contract packages:

#### Processing Plant

- Coarse ore handling
- Grinding
- Flotation
- Concentrate handling
- Tailings handling
- Reagents Handling and Storage
- Plant service
- Electrical distribution, control and communications

### Tailings Storage Facility

- Earthworks
- Electrical, mobile

### Rupice Mining

- Mining
- Mining equipment
- Explosives Magazine
- Mining facilities

### Rupice on site infrastructure

- Crushing system
- Paste plant/backfill
- HV Substation and distribution
- Control system and Comms
- Sewage
- Ponds and drains
- Waste disposal

### Off site infrastructure

- Haul road Rupice to Process Plant
- Power supply
- Haulage contractor
- Railway siding
- Concentrate logistics

### Other

- First fill
- Spares
- Bussing
- Mobile equipment

Across these physical areas, a number of activities have been identified, many of which are common to all areas. Activities (not including procurement) have been identified as follows. Those in *italics* will be managed by Eastern Mining and/or ADT at all locations:

### Services

- *Site E&C Management*
- *Permitting Management*
- *Statutory Site Management*
- *Training - Execution & Ops*
- *Security*
- *External Affairs*
- *Finance Control / Accounting*

- *HR Management*
- *Legal*
- *Site Services*
- *Project Services*

### **Contracts**

- *Contract Formation & Award*
- *Contract Administration & Close Out*

### **Engineering**

- Engineering Management
- Detailed Design
- Shop Detailing
- Field Engineering
- *Engineer of Record*
- *Quality Assurance*
- *Document Control*
- Survey
- Fire System Design, and Certification

### **Construction**

- Earthworks
- Ponds & Linings
- Concrete Supply
- Earthing Grid & Buried Services
- Concrete Install
- SMP
- E&I
- Architectural
- Craneage / Lifting
- Scaffolding / Access
- Commissioning
- Contractor Management
- *Construction Site Management*

A matrix of these activities has been developed which shows the contract packages. Many of these relate to the supply of specific equipment; of most relevance to the CEMP due to the activities involved are the following:

- P501 Bulk Earthworks and Roads
- P502 Concrete Installation
- P503V Structural, Mechanical & Piping Installation Vares
- P503R Structural, Mechanical & Piping Installation Rupice
- P504V Electrical & Instrumentation Installation Vares
- P504R Electrical & Instrumentation Installation Rupice

- P505 Pre-Engineer Buildings
- P506 Fabric Buildings
- P507 Haul Road Upgrade
- P508V Power Supply Vares
- P508R Power Supply Rupice
- P509 TSF
- P510 Explosive Magazine

### 4.3 Enabling works

Some enabling works will occur at Rupice during the 60 day disclosure phase of the ESIA, before the document suite is finalised to take into account additional stakeholder comments not already addressed. This work will take place between October 2021 and January 2022 and consists of the following:

- Tree felling, stump removal and disposal, top soil removal and stockpiling
- Initial Water Treatment Plant and Drainage, to include site clearance, drainage work excavations, drainage pipe and manhole installation and water treatment facility installation.
- Temporary Access Road to Lower Portal, to include excavation, construction of 2500m embankment, construction of unibond layer, protection of slopes and Lower Portal decline excavation.
- Temporary Access Road to Upper Portal, to include excavation, construction of 2800m embankment, construction of unibond layer, protection of slopes and Lower Portal decline excavation.
- Access to Vent Pad and Stockpile Pad, to include excavation, protection of slopes, 4000m of embankment, construction of unibond layer and Ventilation pad construction.

This work will be managed by Eastern Mining using the three key implementation steps outlined above.

### 4.4 Structure and Responsibility

A key element in the environmental and social management approach is the appropriate identification of the roles, responsibilities, authorities, and accountability of the Project personnel (including ADT and Contractors). It is the responsibility of ADT and Contractors to ensure effective implementation of the CEMP by:

- Provision of adequate resources;
- Documentation and communication of individual roles and responsibilities;
- Establishing clear reporting lines; and
- Establishing clear managerial accountabilities for environmental and social performance.

### 4.5 Communications

Internal interfaces within the Project such as those between ADT and Contractors; and external interfaces, such as those between ADT and the authorities, suppliers, communities and

Contractors need to be properly managed to ensure effective operation of the ESMS. ADT will establish and maintain programmes and other formal mechanisms for internal and external communications regarding its environmental and social aspects, the ESMS and community initiatives.

The Stakeholder Engagement Plan will be applied to the implementation and control of all Project related communications with its stakeholders.

#### *4.5.1 Internal Interfaces*

The Environmental Manager will be responsible for the planning and implementation of internal communication concerning environmental issues across the Project. The Community Liaison Officer will be responsible for the planning and implementation of internal communication concerning social issues.

Internal communications on environmental and social issues for the Project will be primarily aimed at achieving the following:

- Promoting environmental and social awareness;
- Reinforcing employees' environmental and social responsibilities;
- Informing employees and contractors about environmental and social risks and Project environmental and social standards and requirements;
- Communicating environmental and social performance;
- Sharing best practices and common problems/solutions; and
- Soliciting feedback on environmental and social issues.

The Community Liaison Officer will work with the Environmental Manager to enhance the effectiveness of these methods of communication and to establish new methods, where necessary.

#### *4.5.2 External Communication*

External communications during the construction phase are primarily designed to keep key external stakeholders apprised of Project environmental and social performance and current environmental or social initiatives. This will include:

- Educating the public on the environmental and social aspects of Project to recognise the main issues associated with construction activities;
- Informing local communities of any key upcoming construction activities;
- Reporting Project environmental performance as required by regulators and informing regulators of any occurrences of environmental non-compliance and the corrective actions implemented to prevent any recurrence

The Stakeholder Engagement Plan defines the consultation approach and methods for the Project during the construction phase and includes a mechanism for receiving, documenting and responding to external inquiries and / or community grievances.

No environmentally related information will be sent to a regulator or lenders without prior consent of the E&S Manager.

#### *4.5.3 Contractor Interface*

Communications between ADT and Contractors will be undertaken at site level.

#### *4.5.4 Complaints or Grievances*

The Stakeholder Engagement Plan includes procedures related to receiving, and responding to, complaints and other issues of concern from local communities within the Project area and from any other stakeholders. These mechanisms address:

- Dissemination of information regarding the Project;
- Procedures for receiving complaints during construction;
- Procedures for the rapid response to complaints during construction; and
- Coordination between ADT and Contractors with regards to complaint receipt and response.

### **4.6 Emergencies and Contingency Plans**

The ESMS includes the following specific plans which will be implemented by ADT and its Contractor(s) throughout the construction phase to address possible emergency situations during the construction phase of the Project:

- Soils, Contaminated Land and Erosion Control Management Plan;
- Chance Finds Procedure; and
- Emergency Preparedness and Response Plan.

The EPRP will be further developed with local emergency services to include mines rescue services as appropriate.

## 5.0 Monitoring and Reporting

### 5.1 Monitoring and Measurement

Monitoring is an integral part of the ESMS as it establishes how the Project is performing against the requirements of the CEMP and any associated objectives and targets. Both ADT and its Contractor(s) will demonstrate how the requirements of the Project CEMP are being complied with. Key monitoring tasks will be undertaken by both ADT and the Contractor to:

- Identify any negative impacts from the construction phase;
- Assess the effectiveness of control measures;
- Demonstrate compliance with the CEMP and objectives and targets;
- Identify if further controls / corrective actions are required; and
- Identify any areas for potential improvement in environmental or social performance.

A three tiered approach will be applied to the monitoring of the Project performance, as follows:

**Site tours** – These will consist mainly of a daily ‘walkthrough’ the construction site by the Contractor(s) staff and ADT staff(s);

**Site Inspections** - To be conducted weekly by the contractor Contractor(s) staff and ADT staff(s) according to list of roles and responsibilities to check construction site activities against a planned checklist;

**Environmental Social Monitoring Programme** – Monitoring of key environmental conditions such as air quality, noise and water quality will be undertaken in accordance with the Environmental Social Monitoring Plan.

### 5.2 Non-conformance and Corrective and Preventative Action

All areas of non-conformance identified through environmental inspections, reviews or audits will be documented and investigated. Non-conformances are considered to be; a deviation from the ADT environmental and social policies or their underlying objectives and targets, a deviation from the requirements of the CEMP and associated plans / procedures, and/or regulatory non-compliance.

Strict non compliance measures will be enforced in the event of a management failure and appropriate corrective actions put in place. The non-compliance procedure will be applied for identifying and resolving non-compliant conditions and provides a mechanism to ensure that:

- The EM E&S Manager is made aware of any area of the Project where serious or repeated nonconformances occur;
- All identified non-conformances are adequately followed up to ensure that applied corrective actions are effective;
- All followed up non-conformances are formally closed out, to signify that an appropriate level of corrective action has been applied to reasonably ensure that a repetition of the same problem will not occur; and

- Non-conformances are analysed at appropriate intervals to identify overall improvement opportunities.

A need for changes to policy, performance objectives or measures, and/or other improvements to the CEMP / ESMS may arise as a result of this management review process and observations, conclusions and recommendations will be documented for necessary action.

Should monitoring activities show a non-conformance Adriatic Metals will undertake a review process. This process determines the source, pathway and impact of the non-conformance and the process is described in flow chart below.

