

Stakeholder Engagement Framework

September 2020

Manono

Dathcom Mining SA
Manono Mine Site

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1. INTRODUCTION

The Manono Lithium and Tin Project ('Manono Project', or the 'Project') is proposed to be developed on the 188 km² Exploration Licence PR13359, located in the Tanganyika District 500 km due north of Lubumbashi in the south of the Democratic Republic of Congo (DRC) in central Africa (Figure 1-1). The Manono Project is located approximately 2.5 km from the town of Manono and is the largest undeveloped hard rock lithium project globally, with a Joint Ore Reserves Committee (JORC) Compliant Mineral Resource of 400 Mt @ 1.65% Li₂O (spodumene).

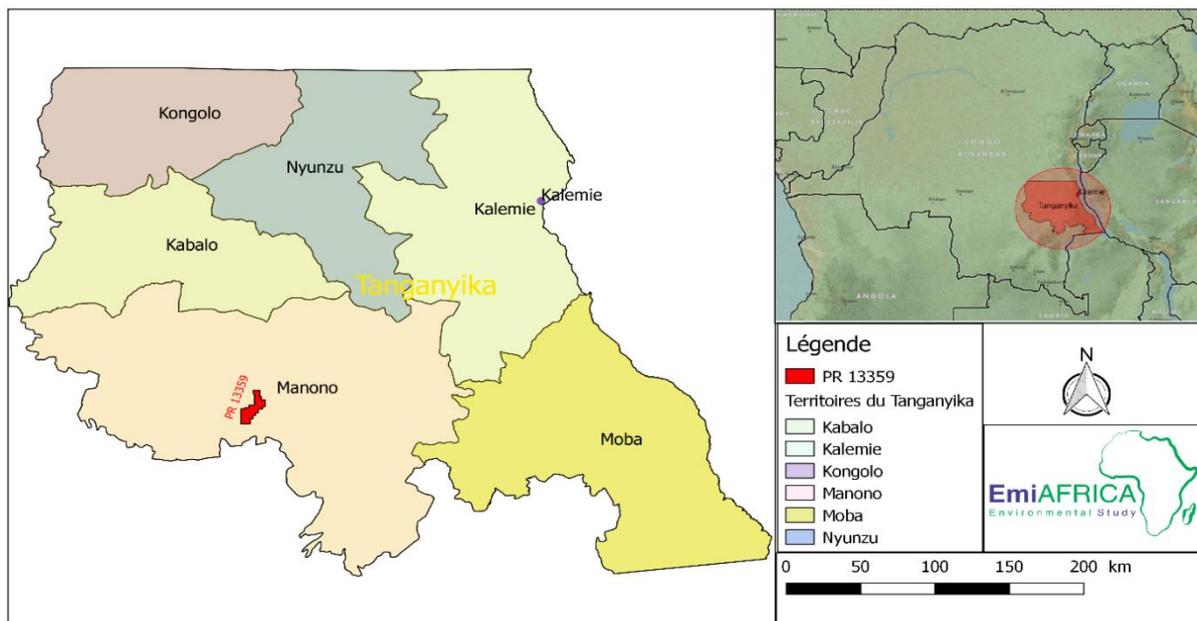


Figure 1-1 Location of the Manono Project

Dathcom Mining SA (Dathcom) is responsible for the Manono Project and is majority owned (60%1) by AVZ Minerals Limited (AVZ), a mineral exploration company listed on the Australian Securities Exchange (ASX: AVZ). Other owners of the Manono Project include La Congolaise d'Exploitation Minière SA (25%) (Cominiere, a State-owned enterprise) and Dathomir Mining Resources SARL (15%) (Dathomir, a privately owned company).

AVZ is seeking to convert its existing Exploration Licence PR13359, which contains the Manono-Kitotolo lithium-rich pegmatite deposits, into a Permis d'Exploitation (PE) (referred to herein as the Mining Lease). Mining will be a continuation of an existing historical open pit (Roche Dure), with a proposed production rate of 4.5 million tonnes per annum (Mt/a). The previous tin mine was operated between 1919 and 1982 by Géomines (CONGO-ETAIN). Since then, artisanal miners have taken advantage of the closed site.

It is proposed that conventional drill and blast, load and haul open pit mining techniques will be used to extract the mineralised material. Run of Mine (ROM) feed will be defined by grade control procedures in the pit and delivered by truck to a ROM pad adjacent to the

1 AVZ has the rights to buy out the 15% of Dathomir shares.

processing facility. Waste rock will be deposited in a managed waste rock area. Tailings slurry will be piped to the tailings storage facility (TSF). The expected life of the mine is 20 years.

To convert an Exploration License (PR) into an Exploitation License (PE), an Environmental and Social Impact Assessment (ESIA) and Environmental Management Plan of the Project (EMPP) is required and is currently being developed to meet the requirements of DRC legislation, international standards, applicable international treaties and agreements that the DRC is signatory to as well as the ASX social and environmental policies.

This document forms the Stakeholder Engagement Framework (SEF), which sets out the principles Dathcom will adhere to when planning and carrying out engagement activities, so that the views and interests of its stakeholders are consistently and meaningfully considered.

The SEF builds on the initial stakeholder identification and engagement undertaken during the development of the Project's Environmental and Social Impact Assessments (ESIAs).

The SEF is a "living document" that will be updated and refined as the Project progresses. This includes a revision prior to the construction phase, to update the SEF to develop a fit for purpose a Stakeholder Engagement Plan (SEP).

1.1 Purpose and Objectives

Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of stakeholders, and building constructive and responsive relationships that are important for successful management of a project's environmental and social risks, as well as the sustainability of a Project's outcomes.

The main objectives of the SEF are to:

- To establish a systematic approach to stakeholder engagement that will help Dathcom build and maintain constructive relationships with its stakeholders;
- To assess the level of stakeholder interest and support for the Project and to enable stakeholders' views to be considered in Project design and to improve the environmental and social sustainability of the Manono Lithium and Tin Operations (MLTO);
- To ensure that information on environmental and social risks and impacts is disclosed to stakeholders, including vulnerable groups, in a timely, understandable, accessible and culturally appropriate manner, language and format;
- Provide stakeholders with an accessible and inclusive means to raise issues and grievances allowing the Project to respond to and manage such grievances.

This SEF defines a technical and culturally appropriate approach to engagement, consultation and disclosure in the MLTO environment, to ensure sufficient community participation and provision of adequate and timely information to all communities and adequate opportunity for stakeholders to voice opinions, concerns and issues. Records of

stakeholder engagement and opinions of stakeholders should be considered when making business decisions.

Prior to the construction phase of the Project, a SEP will be developed to operationalise the SEF, reflect stakeholder and engagement activity updates, and outline the communications plan moving forward.

1.2 Applicable Standards

This SEF has been designed in accordance with the provisions of the following legislation and international standards.

1.2.1 DRC Legislative Requirements

The mining industry in the DRC is regulated by the Mining Code (Law n° 18/001) and the Mining Regulation, which was adopted in 2018. In accordance with the Mining Code, Dathcom is required to consult with government and local government authorities on the Project. Stakeholder engagement with the local communities is required under the Mining Regulation, specifically in Appendix VIII, Part VII, Article 126. It is noted that the Mining Code requires a contribution (Cahier des Charge) be made to local communities affected by the operational business, amounting to at least 0.3% of turnover within one year of the relevant accounting year.

1.2.2 International Finance Corporation Performance Standards

The approach to engagement has been guided by the International Finance Corporation (IFC) Performance Standards, which highlight the need for on-going and appropriate communication between the Project proponent and interested or affected parties through all stages of a Project's lifecycle. The IFC Performance Standards (2012) provide guidance on good practice in stakeholder engagement and participation; primarily through Performance Standards 1, 4, 5 and 8.

The IFC Performance Standard 1 provides an outline of public consultation, disclosure and participation requirements, including requirements that:

- A range of stakeholders should be identified;
- Project information should be disclosed to affected communities and other stakeholders to understand the risks, impacts, and opportunities of the project;
- When affected communities are subject to identified risks and adverse impacts from a project, a process of Informed Consultation and Participation should be undertaken in a manner that provides the affected communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them;
- Project disclosure, informed consultation and participation processes should be documented.

The IFC Performance Standard 1 requires projects to establish a grievance mechanism to receive and facilitate resolution of concerns from affected communities regarding a

project's environmental and social performance. The grievance mechanism should be disclosed and clearly explained to the affected communities during the stakeholder engagement process.

Additionally, IFC Performance Standard 5 requires projects to establish a grievance mechanism consistent with Performance Standard 1 to receive and address specific concerns about compensation and resettlement that are raised by displaced persons or members of host communities.

1.2.3 World Bank Environmental and Social Framework

The World Bank Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure requires Project proponents to engage with stakeholders throughout the Project lifecycle, and through disclosure of information, consultation, and informed participation.

To facilitate this, ESS10 requires the proponent to develop and implement a stakeholder engagement plan that is appropriate to the nature and scale of the Project and its risks and impacts and tailored to the characteristics and interests of the affected communities. The stakeholder engagement plan should include differentiated measures to enable effective participation of those identified as disadvantaged or vulnerable. The stakeholder engagement plan also requires a grievance mechanism, and ongoing monitoring and reporting to affected communities.

In addition to ESS10, all standards have stakeholder engagement requirements, in particular:

- ESS5: Stakeholder engagement as part of land acquisition process and resettlement process;
- ESS7: Engagement with Indigenous Peoples who may be impacted by the Project;
- ESS8: Engagement with regards to cultural heritage.

1.2.4 Equator Principles

The Equator Principles provide a baseline and framework for financial institutions to identify, assess and manage environmental and social risks when financing a project. The Equator Principles apply to the financial institution signatories who are collectively known as the Equator Principles Financial Institutions (EPFI). The latest version, Equator Principles version 4 (EP4) were updated in July 2020 and provide the following guidance:

- **Principle 2: Environmental and Social Assessment:** Requires the completion of an assessment to determine environmental and social risks and impacts, and any mitigation measures;
- **Principle 3: Applicable Environmental and Social Standards:** Requires that Projects outside of designated country (such as in the case of this Project) comply with the applicable IFC Performance Standards and World Bank Environmental and Social Framework;

- **Principle 5: Stakeholder Engagement:** Requires demonstration that effective stakeholder engagement is undertaken in a culturally appropriate manner, with relevant stakeholders to the Project. This includes stakeholder engagement with Indigenous Peoples and vulnerable groups;
- **Principle 6: Grievance Mechanism:** Requires a grievance mechanism to be established for use by stakeholders and workers. The grievance mechanism should record grievances and the steps undertaken to resolve grievances.

2. PROJECT CONTEXT AND PREVIOUS ENGAGEMENT ACTIVITIES

2.1 Project Context

The Project is in the Tanganyika District 500 km due north of Lubumbashi in the south of the Democratic Republic of Congo (DRC) in central Africa (Figure 1-1). The Tanganyika District is made up of six territories, including Kabalo, Kalemie, Kongolo, Manono, Moba, and Nyunzu. The Project components, including an open pit mine, processing plant, waste dump, ROM and TSF (Figure 2-1), are all located within the Manono Territory.

Agricultural activities, including cropping, animal husbandry and fish farming, are the primary economic activity in the Manono Territory. Additionally, the region is rich in mineral resources including spodumene, columbite, tin and tantalite, which has led to many people undertaking artisanal mining activities in the immediate area of the proposed MLTO.

The land within the PR is mainly characterised by small hills, forests, lakes, and rivers. Land use in the general area consists of subsistence farming and artisanal mining activities. The immediate area of the proposed MLTO is bordered to the north by the town of Manono (approximately 2 km) and the east by the Lukushi tributary (approximately 6 km).

The social area of influence (AoI) was determined by the distance of the social receptor from the mine site and categorised into three groups (ESIA 2020):

- The area of direct influence, within a radius of 5 km around the project;
- The extended area of influence, within a radius of 10 km;
- The area of regional influence, within a radius of 15 to 20 km from the project.

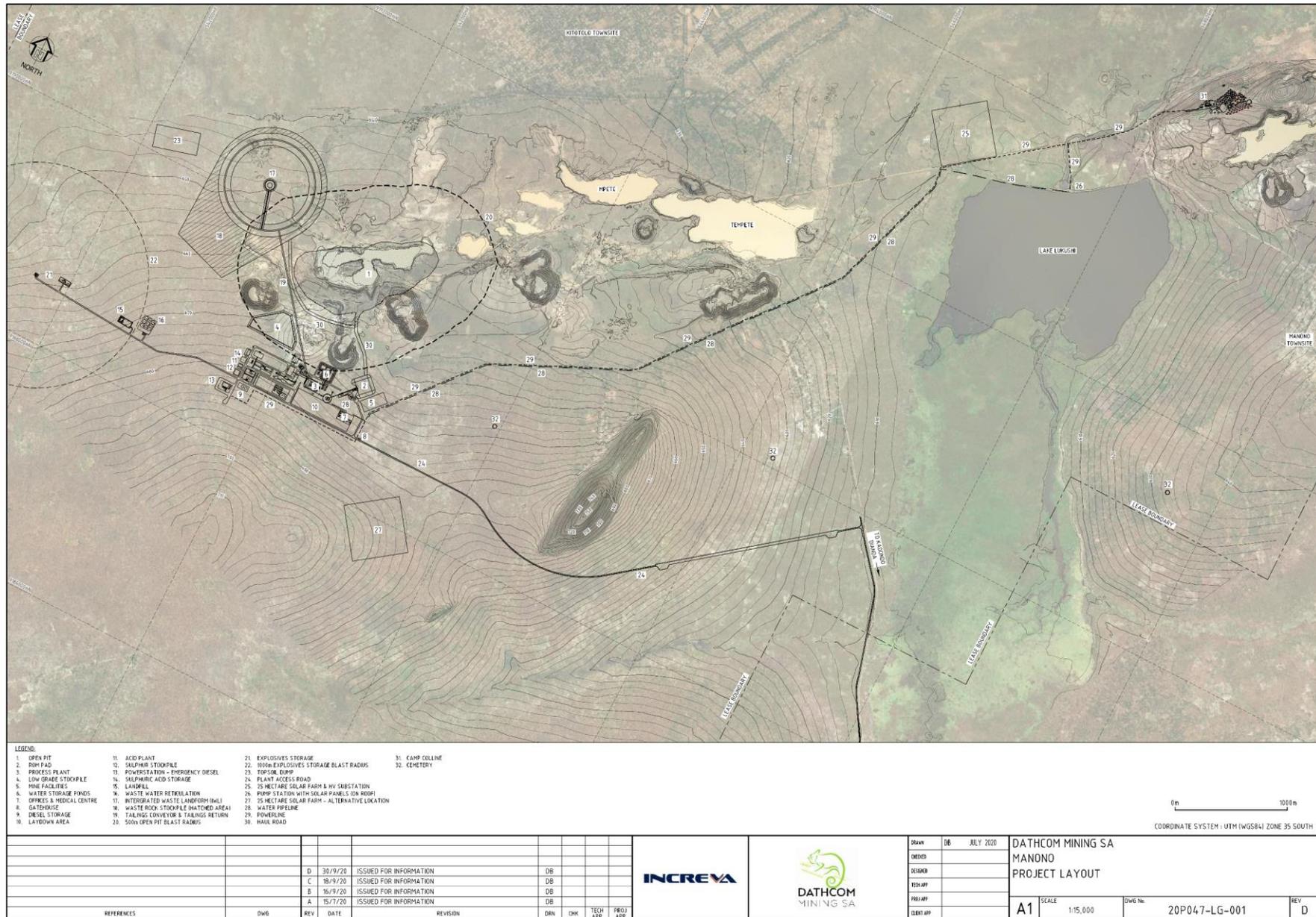


Figure 2-1 Project Layout

Table 2-1 and Figure 2-2 provide an overview of the surrounding social receptors identified as being part of the Project’s social Aol. While those within 5 km of the Project will likely experience the majority of the potential impacts, particularly disturbances from Project activities (e.g., dust and noise), the extended and regional area may also experience potential impacts, such as regional influx and increased traffic.

Village Name	Population	Proximity to the center of Manono	Affected Area
Manono	21 000	0 km	Direct influence
Lwakato	130	± 4 km	Direct influence
Pungwe	3468	± 5 km	Direct influence
Kanteba	62 914	± 7 km	Extended influence
Malata	443	± 7 km	Extended influence
Luba	512	± 10 km	Regional influence
Boulevard Lwamba	573	± 12 km	Regional influence
Munene	130	± 15 km	Regional influence
Kamala	424	± 15 km	Regional influence
Luvua	27 580	75 km	Regional influence

Table 2-1 Villages surrounding the Project

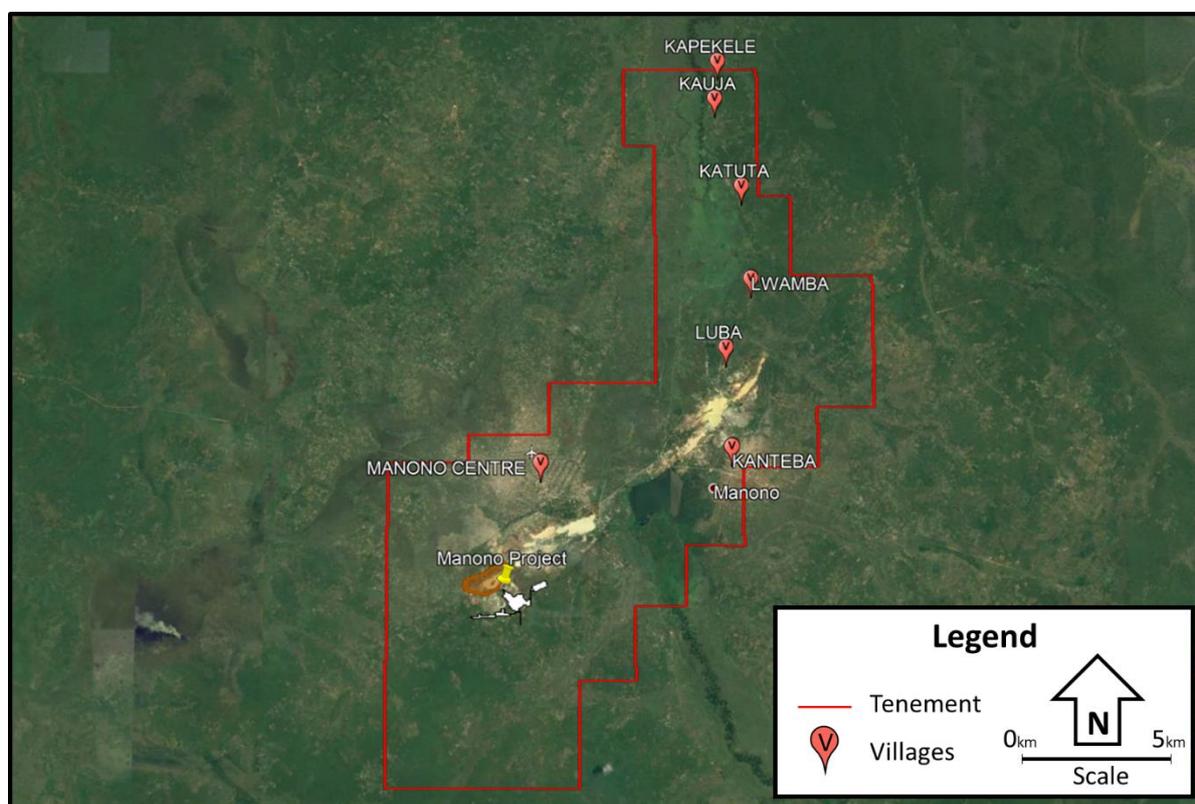


Figure 2-2 Local Communities within the Tenement

2.2 Previous Engagement

This section summarises the stakeholder engagement activities that occurred between 31 October and 3 November 2019, as part of the ESIA. Previous stakeholder engagement was undertaken to meet requirements of:

- Equator Principles;
- IFC Performance Standards;
- World Bank guidelines;
- DRC legislative requirements.

The purpose of the previous stakeholder engagement was to inform stakeholders of the upcoming Project and to provide stakeholders with an opportunity to comment on the Project. Data obtained from the stakeholder engagement was used to provide input into the ESIA and EMPP.

Stakeholder engagement was designed with the objective to provide sufficient and accessible Project information to stakeholders. This included information for stakeholders to understand the Project, the legislative context, a mechanism for stakeholders to provide feedback/comments and verification that feedback/comments were recorded and considered in the impact assessment, and to outline the ESIA process in general.

Meetings were the primary method of stakeholder engagement undertaken. This involved inviting stakeholders to meetings via letters of invitation in French that were delivered electronically or by hand, and verbal invitations in Swahili. During the meetings the following forms of engagement were used:

- Written **Background Information Document** with information about the Project;
- **Attendance Registers** to record meeting attendees ;
- Using the **Issues and Concerns Register** to record of stakeholder feedback/comments;
- Information **posters** (in French) displayed at the meetings.

Four meetings were held in the October to November 2019 period, with a summary of key feedback/comments received provided in Table 2-2. Further detail on the stakeholder engagement methods is outlined in Section 4.4.

Additional stakeholder engagement activities were carried out in early 2020. Meetings were held in the Project area between the 12th and 13th of January 2020 with separate meetings conducted for local government, chiefs, civil society and other key stakeholders. During these meetings, stakeholders were encouraged to take documents and comment sheets for distribution to their colleagues, and friends.

The purpose of these meetings was to assist interested and affected parties to comment on the findings from the previous round of engagement. Information on the Project description, the ESIA process and a summary of the potential positive and negative environmental and social impacts, and proposed management measures were provided. This information was presented to stakeholders verbally, in writing (summary document) and visually, on a set of posters in French, Swahili, Kiluba and English.

2.3 Summary of key concerns

Based on the outcomes of the engagement and issues and concerns register the following were identified as key concerns:

- Local employment opportunities in the social Aol;
- Transparency of the employment process;
- Effects of the Project operations on the agricultural industry, if a large number of people transition to work for the Project rather than conduct agricultural activities, which may cause food shortages;
- Community development opportunities (e.g., training, schools and healthcare facilities) and support for the agricultural industry;
- The management of illegal artisanal mining;
- The location of the TSF to avoid negative impacts to the surrounding area;
- Environmental impacts and rehabilitation activities.

Date	Stakeholders	Location	Feedback/Comments
31/10/2019	Chief Luba Traditional Authorities (Bakongolo community)	Dathcom boardroom in Manono camp	<ul style="list-style-type: none"> ▪ Concern that community members working in at Dathcom will result in scarcity of agricultural products due to not enough people farming; ▪ Concern that members of local communities are less frequently engaged to work at Dathcom, compared to those who live outside Manono who form the majority of the workforce; ▪ Concern about few permanent employment opportunities for members of local communities, compared to comparably high level of casual employment opportunities; ▪ Local communities would like Dathcom to support the community, e.g., professional training centre, road rehabilitation, hospital and school construction followed by shopping centre construction, and water supply station; ▪ The local community believes that if there are more local community members are employed at Dathcom, they will be able to advocate for Dathcom; ▪ The local community continues to request for assistance on an agricultural project; ▪ There have been requests for Dathcom to modify the current format of employment, which has had many complaints; ▪ It was suggested that Dathcom should employ a local from Bakongolo in the human resources and social department in Lubumbashi; ▪ Meeting participants want to know more about the future of illegal artisanal miners in the Dathcom tenement; ▪ The Bakongolo community would like Dathcom to give more respect to traditional chiefs and notability around the Dathcom mine.
01/11/2019	NGOs; Army; Police; Directorate General of Migration (DGM); Territorial Administrator (AT);	Manono District Administration Office	<ul style="list-style-type: none"> ▪ Officials requested an update on the identification of foreigners on the Dathcom site; ▪ A concern was raised that the employment process needs to be transparent; ▪ It was suggested that the location of the tailings storage facility (TSF) should be investigated and mitigation measures implemented to avoid negative impacts on the surrounding area, especially if located on the adjacent concession area;

Date	Stakeholders	Location	Feedback/Comments
	Academics; Civil Societies		<ul style="list-style-type: none"> Officials support proposals for Dathcom to invest in school buildings and community clinics that are not only in the mine lease, but also in the “Groupement” and “Secteur” areas. They highlight this will have a positive impact on the community; The AT appreciates Dathcom’s assistance with transport during emergencies; Officials would like the ESIA team to develop mitigation and rehabilitation measures to address negative impact of the Project on the environment, e.g. through tree planting.
02/11/2019	Territorial Youth Council	Croix-rouge conference venue	<ul style="list-style-type: none"> Meeting attendees would like to know when Dathcom will move to mining; Twa community members concerned about only two people from the communities work full-time for Dathcom; Meeting attendees are concerned about the future of stockpiles and Waste Rock Dump within the Dathcom concession; Concerns were raised over the non-employment of youth from Manono, local villages, but Lubumbashi applicants are being processed favourably; Concerns were raised over the future of artisanal miners in the Dathcom tenement; Meeting attendees would like the mitigation and rehabilitation measures for the environment when mining occurs; The local community would like Dathcom to consider funding for future generation, e.g. through education, farming, and health.
03/11/2019	Chief Kiluba Traditional Authorities (Manono community)	Panda Kuboko	<ul style="list-style-type: none"> Meeting attendees were eager to know if the Roche Dure open pit is emptied; The local community requests Dathcom to inform the Chief in advance of all aspects of Project development; Meeting attendees were interested in understanding if there will be mitigation and rehabilitation measures with respect to deforestation around and in the concession area.

Table 2-2 Key Stakeholder Feedback/Comments

3. PROJECT STAKEHOLDERS

The first step in preparing a SEF is identifying, analysing and mapping the Project stakeholders. This is important to inform the design of the SEF, particularly in developing Dathcom's approach to consultation and communication. This involves identifying relevant stakeholders or groups of stakeholders, characterising the key stakeholder issues and concerns, and mapping the stakeholders to determine the appropriate level of engagement for each stakeholder or stakeholder group. This section describes the outputs from the stakeholder mapping process.

3.1 Stakeholder Identification and Analysis

Stakeholders are persons or groups who are directly or indirectly affected by a project and those who may have interests in and/or the ability to influence a project's outcomes (either positively or negatively).

Stakeholders were initially identified during the stakeholder engagement for the development of the Environmental and Social Impact Assessment (ESIA) for the Project. This involved the conducting of community meetings, focus groups, and information sharing meetings, which were carried out in 2019. Further information provided in Section 2. A stakeholder mapping exercise was undertaken to identify and prioritise the Project stakeholders as well as identify issues likely to be of concern to the stakeholders. The mapping exercise was underpinned by the matrix presented in Figure 3-1. The matrix categorises stakeholders based on their interest in and influence over the Project. The outcome helps determine the level of engagement and the types of tools that will be used to consult with different stakeholders/ stakeholder groups.

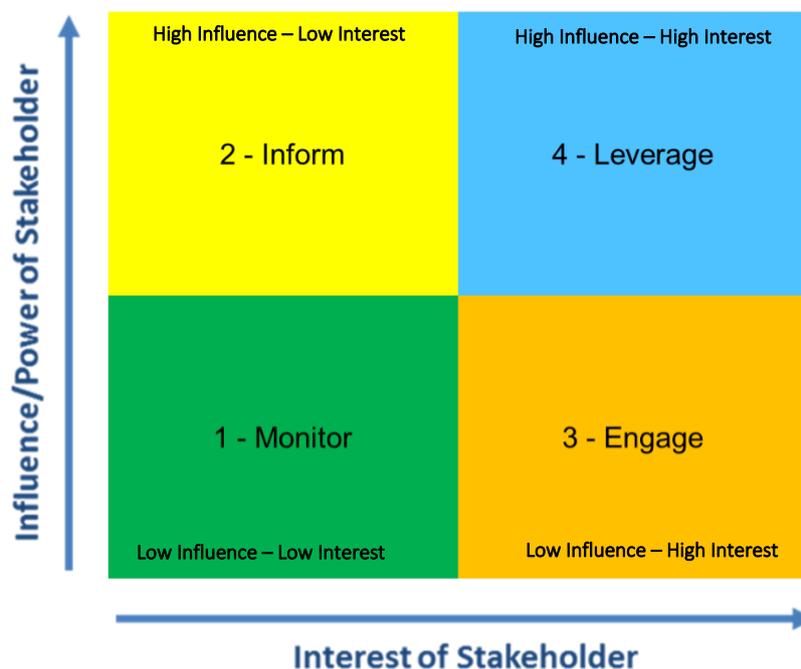


Figure 3-1 Stakeholder Mapping Matrix

The mapping exercises categorises stakeholders as follows:

1. **Monitor:** *low influence and low interest.* Typically, this group includes those who have limited interest and influence on the Project. The stakeholders need to be monitored, while proactive engagement will be limited.
2. **Inform:** *high influence and low interest.* From an impact assessment perspective, these are stakeholders that have the potential to influence Project outcomes but may not have a specific interest in impact assessment related issues. Stakeholders in this group should be kept informed on the progress of the Project development.
3. **Engage:** *low influence and high interest.* This categorisation includes those groups or organisations that are not adversely affected, but whose interests determine them as stakeholders. As such, this group should be kept engaged and the Project should maintain an open channel of communications with this group throughout the Project phases.
4. **Leverage:** *high influence and high interest.* This group of stakeholders is often the most important to the Project as they have the ability to influence Project outcomes and have a high level of interest. Stakeholders in this group should be proactively engaged throughout the ESIA, and for many of these stakeholders beyond the ESIA and during construction and operation stages of the Project.

A key part of this process was identifying individuals and groups who may find it difficult to participate as well as those who may be differentially or disproportionately affected by the Project because of their marginalised or vulnerable status. These holders are collectively termed as vulnerable groups (refer to Box 1).

Box 1 Vulnerable Groups

Vulnerable groups are those individuals or groups who, because of their circumstances, may be disadvantaged or vulnerable. Identification of the vulnerable groups helps the Project further identify individuals and sub-groups who may have different concerns and priorities about Project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement.

For the Project, vulnerable groups are considered to have one or more of the following characteristics:

- Elderly person/s above the age of 60 living alone and/or without social welfare or insurance;
- Ethnic minority groups, including Indigenous Peoples such as the Twa;
- Person/s mental or physical disabilities or injured war veterans;
- Person/s infected with HIV/AIDs and unable to work;
- Orphans/abandoned children;
- Single parents in the poor household category raising children under 18;
- Women led/headed households;
- Poor/near poor households.

After stakeholders were identified, the stakeholders were categorised based on their areas of interest and influence. These include:

- **Environmental:** Including issues such as changes in environmental baseline conditions such as marine and fresh surface water and groundwater quality, elevated noise/ disturbance levels, damage and depletion to ecological systems, generation and disposal of waste and reduction in aesthetic value;
- **Socioeconomic:** Including livelihoods, land acquisition, religious issues, impacts to current water sources (e.g., river, groundwater, etc.), change in land use and occupation, community health and safety, employment, visual impacts, utility requirements, and infrastructure requirements;
- **Technical:** Including feasibility, road, transportation and spill contingencies, and project management issues.

The results of the stakeholder mapping process are summarised in Table 3-1. Different stakeholder engagement strategies are employed based on the categorisation of the stakeholder; whereby stakeholders with higher levels of influence and interest will be engaged to a greater extent. This is further described in Table 3-2.

It is noted that the stakeholder list as well as stakeholder analysis and mapping will continue to be revised according to the ongoing receipt of comments and input from local, national and international stakeholders directed to the Dathcom.

Stakeholder Group	Stakeholders	Concerns			Influence	Interest	Stakeholder Category
		Environment	Socioeconomic	Technical			
Area of Direct Influence							
Local Communities	Manono community	✓	✓	✓	High	High	4 – Leverage
	Bakongolo community	✓	✓	✓	High	High	4 – Leverage
Vulnerable Groups	Refer to Box 1	✓	✓	✓	High	High	4 – Leverage
Traditional Authority	Chief Kiluba Traditional Authorities (Manono community)		✓		Low	High	3 – Engage
	Chief Luba Traditional Authorities (Bakongolo community)		✓		Low	High	3 – Engage
Area of Extended and Regional Influence							
Government and Local Government Bodies	Military			✓	Low	Low	1 – Monitor
	Police			✓	Low	Low	1 – Monitor
	Territorial Administrator (AT)			✓	Low	Low	1 – Monitor
	Directorate General of Migration (DGM)			✓	Low	Low	1 – Monitor
	Ministry of Mines	✓	✓	✓	High	High	4 – Leverage
	Directorate of Mining Environment Protection (DPEM)	✓	✓	✓	High	High	4 – Leverage
	Ministry of Environment and Sustainable Development				Low	High	3 – Engage
	Congolese Environment Agency (ACE)	✓	✓	✓	High	High	4 – Leverage
	Congolese Institute for The Conservation of Nature (ICCN)	✓			Low	Low	1 – Monitor
	Human Settlement and Environmental Protection Directorate (DEHPE)			✓	Low	Low	1 – Monitor
	The Ministry of Land Affairs	✓	✓	✓	High	Low	2 – Inform
	The Ministry of Employment, Labour and Social Welfare			✓	High	Low	2 – Inform
Ministry of Transport and Communications Channels	✓	✓	✓	High	Low	2 – Inform	

Stakeholder Group	Stakeholders	Concerns			Influence	Interest	Stakeholder Category
		Environment	Socioeconomic	Technical			
	Ministry of Planning			✓	High	Low	2 – Inform
	Ministry of National Economy			✓	High	Low	2 – Inform
	Ministry of Rural Development	✓	✓	✓	Low	Low	1 – Monitor
	Ministry of Health		✓		Low	Low	1 – Monitor
	Ministry of Finance			✓	Low	Low	1 – Monitor
NGOs and Community Groups	NGOs: <ul style="list-style-type: none"> ▪ ACTED; ▪ ASF (association de santé familiale); ▪ AIDES ; ▪ Caritas; ▪ Concern Worldwide; ▪ International Rescue Committee (IRC); ▪ Médecins sans frontières (MSF); ▪ Première Urgence Internationale (PU-I); ▪ Save the Congo; ▪ Search for Common Ground (SFCG). 	✓	✓		Low	High	3 – Engage
	Territorial Youth Council	✓	✓		Low	High	3 – Engage
	Civil Societies	✓	✓		Low	High	3 – Engage
Academic Groups	Academics	✓	✓	✓	Low	High	3 – Engage
Business Partners	Cominiere	✓	✓	✓	High	High	4 – Leverage
	Dathomir	✓	✓	✓	High	High	4 – Leverage
Project Financiers and Donor Partners		✓	✓	✓	High	High	4 – Leverage

Stakeholder Group	Stakeholders	Concerns			Influence	Interest	Stakeholder Category
		Environment	Socioeconomic	Technical			
Contractors and Suppliers		✓	✓		Low	High	3 – Engage
Media		✓	✓		Low	Low	1 – Monitor

Table 3-1 Project Stakeholders

Level of Influence and Interest/Level of Engagement			
1 - Monitor	2 - Inform	3 - Engage	4 - Leverage
<ul style="list-style-type: none"> Inform via public communications (for example through the Project website and press communications); Respond to direct requests for further information and conduct engagement if the stakeholders ask to be consulted; Monitor for feedback. 	<ul style="list-style-type: none"> Make use of interest by informing in low-risk areas; Inform and consult in interest areas; Respond to direct requests for further information. 	<ul style="list-style-type: none"> Keep engaged and consult regularly; Seek to obtain their support and technical guidance, where relevant; Be proactive in communication, provide information and seek views at regular intervals. 	<ul style="list-style-type: none"> Inform and consult in interest areas by formal communications such as meetings or letters, written documents; Involve in governance and decision-making, as appropriate; Maintain ongoing engagement and work collaborative on areas of mutual interest.

Table 3-2 Stakeholder Engagement Strategies

4. STRATEGIES FOR INFORMATION DISCLOSURE

Stakeholder engagement will occur throughout the Pre-Construction, Construction and Operation phases of the Project. A brief description of each phase is provided in Table 4-1.

Phase	Primary Stakeholder Engagement Activity
Pre-construction	Present the final ESIA and EMPP, provide stakeholders with updated information on the Project and construction activities.
Construction	Regularly engage with stakeholders throughout the construction process and activities, including key milestones, key changes in the Project design, and monitoring results from the Construction Environmental and Social Management Plans (CESMP).
Operation	Day to day engagement with stakeholders to maintain good relationships, provide update on the Project progress and monitoring results from the Operations Environmental and Social Management Plans (OESMP).

Table 4-1 Stakeholder Engagement Stages

4.1 Pre-Construction

During the pre-construction engagement, Project information will be disseminated to the stakeholders. The key objectives of stakeholder engagement during pre-construction are to:

- Provide stakeholders with updated information about the Project and progress towards development;
- Engage with government departments regarding construction permits and licenses and provide regular Project progress and updates;
- Disclose the final ESIA and EMPP;
- Confirm the stakeholder concerns, needs and opportunities that were identified during the ESIA and address any new issues that may come to light;
- Road test the Project mitigation measures and benefit enhancers;
- Provide an update on engagement activities that will occur during construction, including the frequency in which activities will be undertaken, the key points of contact within the Project team, and notification of the grievance mechanism and how to log a grievance.

4.2 Construction

The objectives of stakeholder engagement during construction are to:

- Provide regular updates to stakeholders on construction activities, in particular activities that may cause disruptions (e.g., road disruption, impacts on the river water quality, blasting, etc.), changes to construction schedule and changes in designs;

- Continue to engage with government departments regarding construction permits and licenses and provide regular construction progress and updates;
- Continue to implement the various community awareness programs with a focus on community health, safety and security;
- Identify new issues, concerns or needs of the Project affected communities related to construction and address them promptly;
- Provide resolution of community complaints in accordance with the grievance mechanism;
- Assess the effectiveness of environmental and social mitigation measures by participatory monitoring, and social monitoring in communities and direct feedback;
- Identify opportunities for the Project to make a sustainable contribution to local communities and the region;
- Provide information on environmental and social impact mitigation measures and monitoring results (where relevant).

4.3 Operations (MLTO)

The objectives of stakeholder engagement during operation are to:

- Provide updates on the progress of rehabilitation works and operation;
- Maintain constructive relationships with the communities adjacent to the MLTO facilities who are directly impacted by the MLTO;
- Maintain constructive relationships with the government stakeholders and other interested parties;
- Maintain awareness of environmental and safety practices in the local communities, especially emergency preparedness and response;
- Manage concerns and complaints from stakeholders and in particular the local community;
- Monitor community attitudes towards the MLTO and Dathcom.

4.4 Stakeholder Engagement Methods

Multiple stakeholder engagement methods are available to be used to consult with various stakeholder groups in the various phases. These are summarised in Table 4-2.

Consultation Methods	Description of Consultation Method	Targeted Stakeholder Groups
Attendance Register	<ul style="list-style-type: none"> ▪ Completed at all meetings; ▪ Attendees that are unable to sign may add a thumb print; ▪ To be included in stakeholder engagement report. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies;

Consultation Methods	Description of Consultation Method	Targeted Stakeholder Groups
		<ul style="list-style-type: none"> ▪ NGOs and Community Groups; ▪ Academic Groups.
Background Information Document	<ul style="list-style-type: none"> ▪ A5 Booklet; ▪ Distributed at meetings; ▪ Provide reference on impacts and mitigations section – may be included in booklet or provided verbally; ▪ Document to be translated to French. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups.
Community Perception Survey	<ul style="list-style-type: none"> ▪ Survey for community members to collect data on their perception of Dathcom, the Project, and other feedback. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups.
Feedback Mailboxes	<ul style="list-style-type: none"> ▪ To be placed in each Chiefdom; ▪ Allows local community members to provide feedback. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups.
Focus Group Discussion	<ul style="list-style-type: none"> ▪ Smaller group discussions on particular topics / issues; ▪ Seek to obtain detailed feedback and suggestions on the topic / issue. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups.
Frequently Asked Questions (FAQ) List	<ul style="list-style-type: none"> ▪ Prepare a list of FAQs and model answers to provide consistent messaging to all stakeholders; ▪ FAQs to be prepared in consultation with Dathcom; ▪ Ensure FAQ language is inclusive – simple, in appropriate language (e.g., Swahili or Kiluba); ▪ Ensure detail in FAQ does not provide commitments where not confirmed. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups; ▪ Project Financiers and Donor Partners; ▪ Contractors and Suppliers; ▪ Media.
Household Visits	<ul style="list-style-type: none"> ▪ Visits to individual households, particularly vulnerable groups; ▪ To provide information on the Project; ▪ To seek feedback on the Project. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups.

Consultation Methods	Description of Consultation Method	Targeted Stakeholder Groups
Issues and Concerns Register	<ul style="list-style-type: none"> ▪ Meeting proceedings will be recorded in the Issues and Concerns Register; ▪ Document to be translated to French; ▪ To be included in stakeholder engagement report. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups.
Meeting	<ul style="list-style-type: none"> ▪ In-person meetings, in a one-on-one or group setting; ▪ Can include other consultation methods (e.g., PowerPoint Presentation); ▪ Provide stakeholders with information. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups.
Newspaper, Television or Radio Advertisement	<ul style="list-style-type: none"> ▪ To announce Project meetings, events or key Project information; ▪ May be undertaken in one or more mediums, depending on the location of stakeholders. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups.
Performance Theatre	<ul style="list-style-type: none"> ▪ To visually communicate risks and impacts of the Project. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups.
Posters and Maps	<ul style="list-style-type: none"> ▪ To contain information that is provided in the Background Information Document; ▪ Approximately 2-3 posters in the meetings; ▪ Posters will be A1 and laminated. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups.
Project Email	<ul style="list-style-type: none"> ▪ Email address for stakeholders to provide feedback / enquire about the Project. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups; ▪ Project Financiers and Donor Partners; ▪ Contractors and Suppliers; ▪ Media.

Consultation Methods	Description of Consultation Method	Targeted Stakeholder Groups
Project Information Hotline	<ul style="list-style-type: none"> ▪ Telephone number for stakeholders to provide feedback / enquire about the Project. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups; ▪ Project Financiers and Donor Partners; ▪ Contractors and Suppliers; ▪ Media.
Project Information Office	<ul style="list-style-type: none"> ▪ Located in Manono town; ▪ Allows stakeholders to walk-in to provide feedback / enquire about the Project; ▪ Posters, Map of the Mining Area and Proposed Infrastructure and other visual aids to be made available. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups; ▪ Media.
Project Information Sheet	<ul style="list-style-type: none"> ▪ Short-form information sheet, (e.g., brochure); ▪ To provide key Project information or inform community of Project activities; ▪ Provide details on how to leave feedback / enquire about the Project. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups.
Project Website	<ul style="list-style-type: none"> ▪ Project website to contain key Project information; ▪ Provide details on how to leave feedback / enquire about the Project. 	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups; ▪ Academic Groups; ▪ Project Financiers and Donor Partners; ▪ Contractors and Suppliers; ▪ Media.

Table 4-2 Consultation Methods

4.5 Strategy for Engaging Vulnerable Groups

Vulnerable groups consist of people who may not be able to access Project information and articulate their concerns and priorities about Project impacts, owing to certain barriers that disadvantage them. People influenced by these barriers are not expected to or do not feel that they can have a 'voice' in public, and often are more affected by proposed developments. The following measures will be used to remove obstacles to participation for vulnerable groups:

Focus groups for women, will be led by a female facilitator, to share information and discuss any issues and concerns that the women may have regarding the Project development, especially construction related issues.

Focus groups for youth, with particular focus on teenage mothers, will be led by the Community Liaison Officers (CLOs) to encourage them to participate in the Project development.

Focus groups for ethnic minorities, with particular focus on the Twa, will be led by the CLOs to share information and discuss any issues and concerns they may have regarding the Project development, especially construction related issues.

School visits to disseminate Project information and consult with school children and teachers about potential impacts and benefits. Information disclosure through school teachers and students is also an effective way to reach the broader community, especially women, as teachers are important influencers in the community and children often bring information collected from school to share with their families.

Household visits will be undertaken on a case-by-case basis, particularly for people with disabilities, the elderly who have mobility issues, and other vulnerable people that are unable to attend community meetings to ensure they are provided with the Project information and have opportunities to raise their questions and concerns freely without intimidation, discomfort or ridicule.

Stakeholder engagement activities, meetings and information sheets, will be conducted and developed in **multiple languages** to ensure they are appropriate for vulnerable groups. Languages spoken include English, French, Swahili and Kitwa.

While reaching out to different groups particularly vulnerable groups such as women, elderly and disabled, the CLOs and will be mindful that the time and location of consultation are appropriate to their needs. For example, single mothers tend to work long hours trying to provide for their children and participating in meetings and any decision making becomes a last priority for them.

4.6 Stakeholder Engagement and Disclosure Program

The Stakeholder Consultation and Disclosure Program is outlined in Table 4-3. Further detail such as date, time and location of the stakeholder engagement activities will be provided in advance of that activity (e.g., meeting) occurring. All stakeholder engagement activities will be recorded in the Stakeholder Engagement Register MN200-5519-COR-GN-REG-001.

Where a grievance is identified during the stakeholder engagement and disclosure program, it will be recorded and addressed in accordance with the grievance mechanism in Section 5.

Primary Engagement Activity / Topics	Target Stakeholder Groups	Consultation Method	Frequency	Responsibility
Pre-Construction				
Regular updates about the Project and disclosure of final ESIA and CESMP.	All Stakeholders.	Meeting	Monthly and as required	Community Relations Superintendent CLOs, General Manager
		Focus Group Discussion	As required	
		Household Visits	As required	
		Background Information Document	As required	
		Posters and Maps	As required	
		Newspaper, Television or Radio Advertisement	Quarterly and as required	
		Project Information Office	As required	
		Project Information Sheet	As required	
Engage with Government Departments.	<ul style="list-style-type: none"> ▪ Traditional Authority; ▪ Government and Local Government Bodies. 	Meeting	Monthly and as required	Community Relations Superintendent, General Manager
		Focus Group Discussion	As required	
Monitor effectiveness of CESMP.	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ Government and Local Government Bodies; ▪ NGOs and Community Groups. 	Meeting	Bi-annually	Community Relations Superintendent, CLO, Environmental Consultant
		Issues and Concerns Register	Bi-annually	
		CLO	Bi-annually	
		Project Information Office	Bi-annually	
		Community Perception Survey	Bi-annually	
Disclose and consult on construction contractor activities, such as:	All Stakeholders.	Newspaper, Television or Radio Advertisement	Quarterly and as required	Community Relations
			Advanced notification will be	

Primary Engagement Activity / Topics	Target Stakeholder Groups	Consultation Method	Frequency	Responsibility
<ul style="list-style-type: none"> Construction activities and schedule; Additional mitigation measures / updated CESMP; Community health and safety, workers camp code of conducts, environmental and social management, road access and traffic management; Hiring opportunities and practices, and local worker training program. 			given to hiring opportunities so local community members have a reasonable lead time to prepare for application.	Superintendent, CLO
		Project Information Office	As required	
		Project Information Sheet	Monthly and as required	
			Advanced notification will be given to hiring opportunities so local community members have a reasonable lead time to prepare for application.	
		Performance Theatre	As required	
	CLO	As required		
Sustainable Development Plan.	<ul style="list-style-type: none"> Local Communities; Vulnerable Groups; Traditional Authority; Government and Local Government Bodies. 	Meeting	Monthly and as required	Community Relations Superintendent, CLO
		Posters and Maps	Monthly and as required	
		Newspaper, Television or Radio Advertisement	Quarterly and as required	
		Project Information Office	As required	
		Project Information Sheet	Monthly and as required	
Monitor community concerns, attitudes and progress.	<ul style="list-style-type: none"> Local Communities; Vulnerable Groups; Traditional Authority; 	Meeting	As required	CLO
		Issues and Concerns Register	As required	
		CLO	As required	

Primary Engagement Activity / Topics	Target Stakeholder Groups	Consultation Method	Frequency	Responsibility
	<ul style="list-style-type: none"> NGOs and Community Groups. 	Project Information Office	As required	
		Community Perception Survey	Bi-annually	
		Feedback Mailboxes	As required	
		Project Email	As required	
		Project Information Hotline	As required	
Maintain feedback channels.	<ul style="list-style-type: none"> Local Communities; Vulnerable Groups. 	Feedback Mailboxes	As required	CLO
		Project Email	As required	
		Project Information Hotline	As required	
Update FAQs to respond to stakeholder queries.	All Stakeholders.	FAQ	Monthly and as required	CLO
Media briefings.	Media.	Meeting	As required	Community Relations Superintendent, CLO
Construction				
Regular updates about the Project and disclosure of final ESIA and CESMP.	All Stakeholders.	Meeting	Monthly and as required	Community Relations manager, General Manager
		Household Visits	Monthly and as required	
		Posters and Maps	Monthly and as required	
		Newspaper, Television or Radio Advertisement	Quarterly and as required	
		Project Information Office	As required	
		Project Information Sheet	Monthly and as required	

Primary Engagement Activity / Topics	Target Stakeholder Groups	Consultation Method	Frequency	Responsibility
Notification of disruptive activities (e.g. blasting).	<ul style="list-style-type: none"> Local Communities; Vulnerable Groups; Traditional Authority. 	Text Notifications	As required, prior to events of increased disturbance (e.g. blasting, traffic movements, dust, noise, etc.)	Community Relations Manager
Engage with Government Departments.	<ul style="list-style-type: none"> Traditional Authority; Government and Local Government Bodies. 	Meeting	Monthly and as required	Community Relations Manager, General Manager
Undertake community environmental and safety awareness program. Topics include: <ul style="list-style-type: none"> Activities that cause disruption such as air, dust, traffic and noise impacts; Water source impacts and mitigation measures; Health risks, prevention and promotion; Road safety (specifically for children); Workers code of conduct, worker’s health and safety plan; Security management; Emergency preparedness and response; Activities that cause other adverse environmental and social impacts. 	<ul style="list-style-type: none"> Local Communities; Vulnerable Groups. 	Meeting	Monthly and as required	Community Relations manager, CLO
		Posters and Maps	Monthly and as required	
		Project Information Office	As required	
		Project Information Sheet	Monthly and as required	
Monitor effectiveness of CESMP.	<ul style="list-style-type: none"> Local Communities; 	Meeting	Bi-annually	

Primary Engagement Activity / Topics	Target Stakeholder Groups	Consultation Method	Frequency	Responsibility
	<ul style="list-style-type: none"> ▪ Traditional Authority; ▪ Government and Local Government Bodies. 	Newspaper, Television or Radio Advertisement	Quarterly and as required	Superintendent, CLO
		Project Information Office	As required	
		Project Information Sheet	Monthly and as required	
Monitor community concerns, attitudes and progress.	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups; ▪ Traditional Authority; ▪ NGOs and Community Groups. 	Meeting	As required	CLO
		Issues and Concerns Register	As required	
		CLO	As required	
		Project Information Office	As required	
		Community Perception Survey	Bi-annually	
		Feedback Mailboxes	As required	
		Project Email	As required	
		Project Information Hotline	As required	
Maintain feedback channels.	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups. 	Feedback Mailboxes	As required	CLO
		Project Email	As required	
		Project Information Hotline	As required	
Update FAQs to respond to stakeholder queries.	All Stakeholders.	FAQ	Monthly and as required	CLO
Media briefings.	Media.	Meeting	As required	Community Relations Superintendent, CLO

Primary Engagement Activity / Topics	Target Stakeholder Groups	Consultation Method	Frequency	Responsibility
Operations				
Updates about the Project.	All Stakeholders.	Meeting	Bi-annually and as required	Community Relations Superintendent, General Manager
		Household Visits	Bi-annually and as required	
		Posters and Maps	Monthly and as required	
		Newspaper, Television or Radio Advertisement	Once at the beginning of operation and as required	
		Project Information Office	As required	
		Project Information Sheet	Monthly and as required	
Notification of disruptive activities (e.g., blasting).	<ul style="list-style-type: none"> Local Communities; Vulnerable Groups; Traditional Authority. 	Text Notifications	As required, prior to events of increased disturbance (e.g., blasting, traffic movements, dust, noise, etc.)	Community Relations Superintendent
Engage with Government Departments.	<ul style="list-style-type: none"> Traditional Authority; Government and Local Government Bodies. 	Meeting	Bi-annually and as required	Community Relations Superintendent, General Manager
Monitor effectiveness of OESMP.	<ul style="list-style-type: none"> Local Communities; Vulnerable Groups; Traditional Authority; Government and Local Government Bodies; NGOs and Community Groups. 	Meeting	Bi-annually	Community Relations Superintendent, CLO, Environmental Consultant
		Issues and Concerns Register	Bi-annually	
		CLO	Bi-annually	
		Project Information Office	Bi-annually	
		Community Perception Survey	Bi-annually	
Disclose and consult on Project activities, such as:	All Stakeholders.	Newspaper, Television or Radio Advertisement	As required	Community Relations

Primary Engagement Activity / Topics	Target Stakeholder Groups	Consultation Method	Frequency	Responsibility
<ul style="list-style-type: none"> Operation activities and schedule; Additional mitigation measures / updated OESMP; Community health and safety, workers camp code of conducts, environmental and social management, road access and traffic management; Hiring opportunities and practices, and local worker training program. 		Project Information Office	As required	Superintendent, CLO
		Project Information Sheet	Monthly and as required	
		CLO	As required	
Sustainable Development Plan.	<ul style="list-style-type: none"> Local Communities; Vulnerable Groups; Traditional Authority; Government and Local Government Bodies. 	Posters and Maps	As required	Community Relations Superintendent, CLO
		Newspaper, Television or Radio Advertisement	As required	
		Project Information Office	As required	
		Project Information Sheet	Monthly and as required	
Monitor community concerns, attitudes and progress.	<ul style="list-style-type: none"> Local Communities; Vulnerable Groups; Traditional Authority; NGOs and Community Groups. 	Meeting	As required	CLO
		Issues and Concerns Register	As required	
		CLO	As required	
		Project Information Office	As required	
		Community Perception Survey	Bi-annually	
		Feedback Mailboxes	As required	
		Project Email	As required	
		Project Information Hotline	As required	

Primary Engagement Activity / Topics	Target Stakeholder Groups	Consultation Method	Frequency	Responsibility
Maintain feedback channels.	<ul style="list-style-type: none"> ▪ Local Communities; ▪ Vulnerable Groups. 	Feedback Mailboxes	As required	CLO
		Project Email	As required	
		Project Information Hotline	As required	
Update FAQs to respond to stakeholder queries.	All Stakeholders	FAQ	Monthly and as required	CLO
Media briefings.	Media	Meeting	As required	Community Relations Superintendent, CLO

Table 4-3 Stakeholder Engagement and Disclosure Program

5. GRIEVANCE MECHANISM

An effective stakeholder engagement process can help to prevent grievances. However, projects with high potential for environmental and social impacts to occur, often result in grievances from stakeholders. Therefore, a grievance mechanism will be established as part of the SEF, and maintained throughout the Project life-cycle, to ensure that grievances are promptly heard, analysed and, to the extent possible, resolved. This section provides the grievance mechanism for the Project.

The main objective of the grievance mechanism is:

- To address grievances promptly and effectively, in a transparent manner resulting in fair, effective and lasting outcomes;
- To provide a grievance management process that is culturally appropriate and readily accessible to all Project affected parties;
- To build trust as integral component of the Project community relations activities;
- To enable a systematic identification of emerging issues facilitating correcting actions and pre-emptive engagement.

5.1 Grievance Procedure

The grievance mechanism will address all grievances raised by stakeholders. A grievance, also referred to as a complaint, concern or issue, is a statement made by a stakeholder based on real or perceived notion that something is unsatisfactory or unacceptable as a result of the Project. This includes grievances associated with environmental and social matters.

A separate grievance mechanism will be developed to address internal grievances relating to employment matters.

The grievance procedure is outlined in Figure 5-1 and further described below.

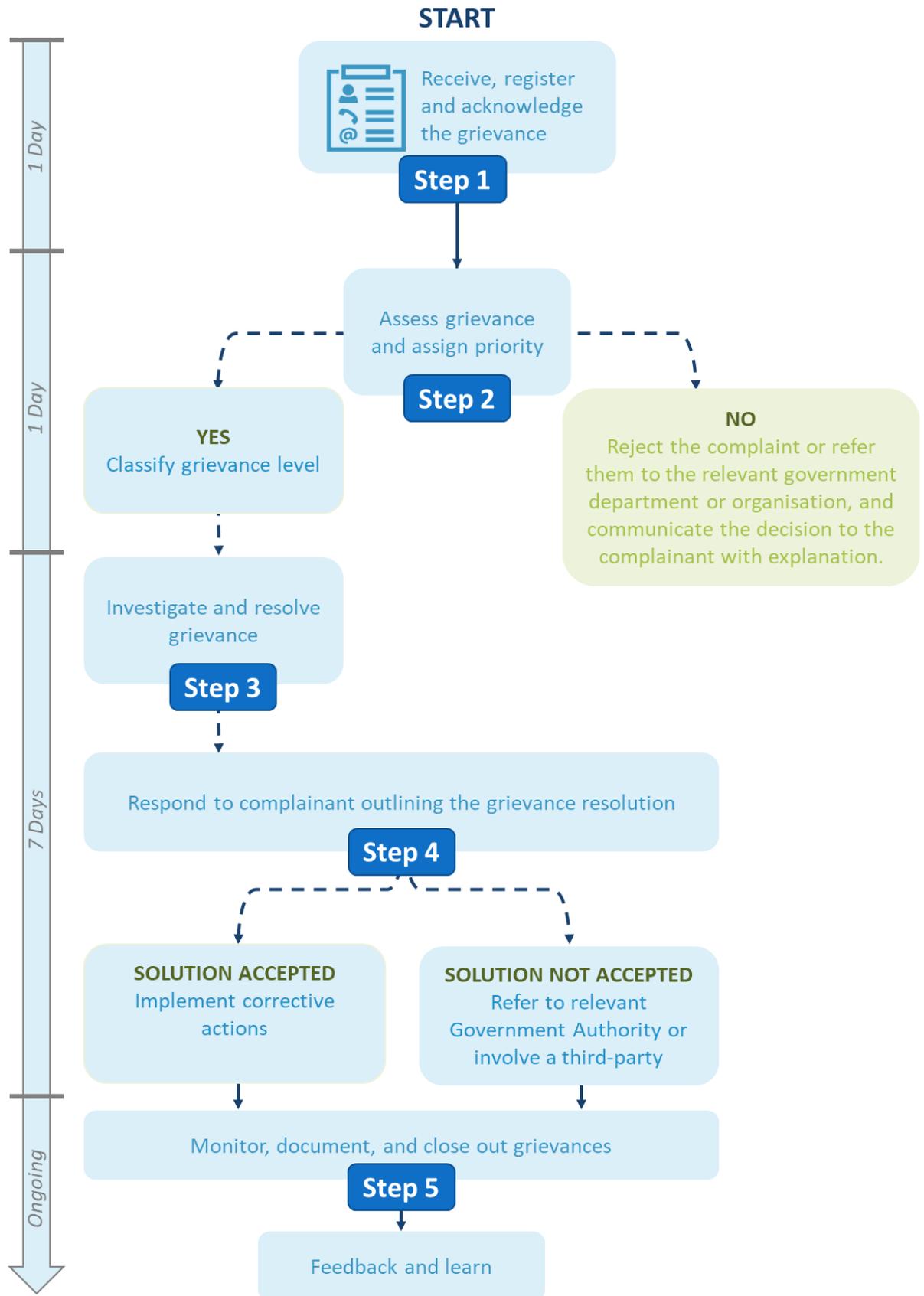


Figure 5-1 Grievance Procedure

5.1.1 Step1: Receive and Acknowledge Grievance (within 1 day)

A variety of methods will be available through which stakeholders can lodge grievances. This will include:

- Face-to-face meetings with a CLO or a designated Project representative;
- Written communication (e.g., email, letter) directed to a CLO, a designated Project representative or left in a grievance box, which will be in the Project Information Office in Manono town and at the Project office. For those who have difficulty reading or writing or are inexperienced with the complaint process the CLOs will assist them in filling out the complaint form;
- Telephone communication via a Project hotline, which is to be established.

It is anticipated that Project CLOs will be the first point of contact for local people to raise grievances (and other issues and concerns).

In all instances, details of the grievance will be detailed on the Grievance Form MN200-5519-COR-GN-FRM-001, to ensure a consistent approach is taken to collecting data (associated with a grievance). If a written grievance is received, a follow-up phone call or meeting may be required to ensure that the grievance is understood and that sufficient information has been obtained from the complainant.

The CLO will communicate, and document in writing, with the complainant acknowledging receipt of the grievance and providing information on the grievances procedure and the anticipated timeframes for resolving the grievance.

5.1.2 Step 2: Assess Grievance and Assign Priority (within 1 day)

Grievances will be forwarded and reviewed in the first instance by the Community Relations Manager. The Community Relations Manager will determine if the grievance is valid (e.g., relates to the Project), as follows:

- If it is decided that a grievance is not valid, the grievance will be dismissed and advice of the decision and the reasons for dismissal will be provided to the complainant in writing (and in person if required). Where applicable, the Project will refer the complainant to a government departments, organisations, or judicial committee within the local government;
- If the grievance is valid, it will be classified in to one of the following categories:
 - Level 1 Complaint: A complaint where potential impacts and/ or consequences are low that can be resolved quickly (e.g., a Project vehicle damaging a local family's fences);
 - Level 2 Complaint: A complaint which is widespread and repeated (e.g., dust from Project vehicles);
 - Level 3 Complaint: A complaint that could potentially result in a serious breach of National laws and regulations, or affect Government and Project image and performance (e.g., inadequate waste management).

For any grievance that requires the involvement of a third party (e.g., technical expert, authority), Dathcom is responsible for contacting the relevant third party for their advice or resolution.

5.1.3 Step 3: Investigate and Resolve Grievance (within 7 days)

Depending on the complexity of the grievance, the CLO may need to consult with the Community Relations Manager, and seek approval from a senior manager (e.g., Construction Manager, or General Manager).

- For grievances assessed as a 'level 1', a CLO will contact the complainant directly to develop and implement solutions with oversight from the Community Relations Superintendent;
- For a grievance is assessed as a 'level 2,' the Community Relations Superintendent will be responsible for identifying a coordinated management solution and response. This should involve other senior managers and sign off from the General Manager;
- For a grievance is assessed as a 'level 3,' immediate intervention of related parties such as senior managers, contractor/s, and/or local authorities to seek their advice on potential resolutions.

5.1.4 Step 4: Respond to Complainant (immediately following investigation)

CLOs will respond to the complainant with the outcomes of the investigation and explain where required the measures to be taken to address the grievance. The response can be communicated in several ways depending on the stakeholder (e.g., face to face, email, letter, phone call, etc.).

If the solutions are not accepted by the complainant/s, the CLO will consult with the complainant/s to obtain further detailed clarification on the issues and to try and agree upon a mutual solution. If a mutual solution cannot be obtained through consultation, a third party may be involved. The third-party can provide advice or facilitate discussions in a way that is mutually acceptable.

In addition, where mediation is desired, academic or other local institutions may be sought out to play an "honest broker" role in mediating between Dathcom and stakeholder groups.

All grievances and grievance consultation will be logged in the Stakeholder Engagement Register, MN200-5519-COR-GN-REG-001, which will include a summary of the grievance, the resolution or agreement on proposed actions (between the Project and the complainant) and monitoring of actions taken in response to the grievance.

5.1.5 Step 5: Grievance Close Out and Documentation

All grievance forms will be stored in the MLTO office and logged in the Grievance Log by the Project's CLOs for monitoring and reporting purposes.

The CLO is responsible for preparing periodic reports for the Community Relations Superintendent about the resolution of each grievance processed by the CLO. The report will include the resolution and closure process.

Every grievance shall be signed off by the entire MLTO management team and the AVZ Chief Operating Officer (COO).

6. MONITORING AND REPORTING

To ensure the desired outcomes are being achieved, the SEF will be monitored throughout the MLTO lifecycle. This information will inform ongoing monitoring and evaluation of stakeholder engagement and grievance management efforts.

Monitoring of stakeholder engagement activities will be undertaken via:

Review of engagement activities in the field:

- During engagement with stakeholders, the CLOs will assess meetings using a feedback evaluation form or by asking questions of participants;
- At the end of each stakeholder engagement phase, the team will debrief with the Project team to assess whether the required outcomes of the stakeholder engagement process are being achieved, and to provide the opportunity to amend the process where necessary.

Systematic, formal evaluation, which will occur on an annual basis or under special circumstances when the MLTO has potential to face a high social risk.

The monitoring results will include the following information:

- Place and time of public engagement activities;
- Information on the participants;
- Issues and concerns raised during the engagement activities;
- List of number and types of grievances raised in the reporting period and the number of resolved and/or outstanding grievances;
- A summary of implemented corrective measures intended to address any grievances and or concerns raised during engagement activities.

Table 6-1 provides frequencies of the internal monitoring and reporting on stakeholder engagement activities, including grievances. Internal monitoring and reporting activities will be undertaken by the CLOs.

Project phase	Internal		
	Monitoring	Reporting	Updating the SEF
Construction phase	Monthly	Monthly	Annually
Operation phase	Monthly	Monthly	Quarterly

Note: The SEF is a living document and it may require updating more frequently than the annual review to reflect changes in engagement activities and the level of interest and influence from stakeholders.

Table 6-1 SEF and Grievance Mechanism Monitoring and Reporting Frequency

7. RESOURCES AND RESPONSIBILITIES

Dathcom is responsible for the overall adherence to the SEF and to provide the funding for stakeholder engagement activities. The successful implementation of the SEF is dependent on clearly defined responsibilities for the Stakeholder Engagement and Disclosure Program. The roles and responsibilities relevant to the implementation of the SEF are outlined in Table 7-1.

Dathcom's Sustainability Manager will be responsible for implementation and management of the SEF throughout the life of the MLTO. The roles and responsibilities are outlined in Table 7-1

Role	Responsibility
General Manager	<p>Has overall responsibility for the Project and is accountable for environmental and social performance during operation.</p> <p>In relation to the SEF, responsibilities will include:</p> <ul style="list-style-type: none"> ▪ Planning and allocating human and financial resources for implementation of engagement activities; ▪ Reviewing monitoring and reporting updates from the Community Relations Manager; ▪ Overseeing the resolution of complex grievances; ▪ Reporting to the AVZ Minerals COO.
Construction Manager	<p>A representative of Dathcom responsible for overseeing the day-to-day implementation of the construction project and the overall management of the site construction teams.</p> <p>In relation to the SEF, responsibilities will include:</p> <ul style="list-style-type: none"> ▪ Assisting in the investigation of grievances and the implementation of grievance resolutions, where necessary; ▪ Reporting to the General Manager.
Sustainability Manager	<p>A member of Dathcom management team responsible for providing support to the engineering and construction teams in terms of implementation of environmental management measures, as appropriate.</p> <p>In relation to the SEF, responsibilities will include:</p> <ul style="list-style-type: none"> ▪ Assisting in the investigation of grievances and the implementation of grievance resolutions, where necessary; ▪ Reporting to the General Manager.
Community Relations Superintendent	<p>A member of Dathcom management team responsible for providing support to the engineering and construction teams in terms of implementation of social management measures, as appropriate.</p> <p>In relation to the SEF, responsibilities will include:</p> <ul style="list-style-type: none"> ▪ Developing a Stakeholder Engagement Plan once the Project moves into the pre-construction phase;

Role	Responsibility
	<ul style="list-style-type: none"> ▪ Hiring, training and overseeing the CLOs; ▪ Reviewing monitoring and reporting of the SEF and Grievance Mechanism; ▪ Investigating and responding to complex grievances; ▪ Reporting to the Sustainability Manager.
Community Liaison Officers	<p>Members of Dathcom staff who are the point of contact for community members and are responsible for the day-to-day implementation of SEF and stakeholder engagement activities.</p> <p>In relation to the SEF, responsibilities will include:</p> <ul style="list-style-type: none"> ▪ Undertaking engagement activities and recording outcomes in the Stakeholder Engagement Register; ▪ Monitoring the SEF and Grievance Mechanism; ▪ Receiving, logging, acknowledging and classifying grievances; ▪ Participating in investigating and resolving grievances; ▪ Ensuring grievances are documented properly and that the Grievance Log is updated regularly, including details of any grievance resolutions; ▪ Reporting to the Community Relations Superintendent.
Mining Manager	<p>A Dathcom Engineer responsible for management, quality control of project component construction and monitoring of engineering operations.</p> <p>In relation to the SEF, responsibilities will include:</p> <ul style="list-style-type: none"> ▪ Assisting in the investigation of grievances and the implementation of grievance resolutions, where necessary; ▪ Reporting to the General Manager.
Processing Manager	<p>A Dathcom Engineer responsible for management of a specific Area of the Project. Responsible for implementation of the EMP at a specific plant component.</p> <p>In relation to the SEF, responsibilities will include:</p> <ul style="list-style-type: none"> ▪ Assisting in the investigation of grievances and the implementation of grievance resolutions, where necessary ▪ Reporting to the General Manager.
Environmental Consultant	<p>Independent consultants appointed by Dathcom to audit the implementation and compliance with the EMP, and other management and monitoring plans where necessary. The outcomes of which will be reported to the Sustainability Manager and General Manager.</p>

Table 7-1 Roles and Responsibilities