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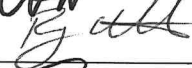




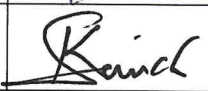
# STAKEHOLDER ENGAGEMENT STANDARD


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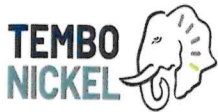
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## 1. ACRONYM AND MEANING

These are the common terminology and acronyms used in the document.

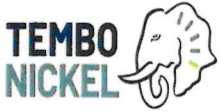
Table 1: Acronym and Meaning Table

Acronym	Meaning
CBP	Community-Based Policing
CSO	Civil Society organisations
DC	District Commissioner
EIA	Environmental Impact assessments
EP4	Equatorial Principle.
ESIA	Environmental and social impacts assessment
GM	Grievance Management.
GRO	Grievance resolution officer
HQ	Head Quarter
HSE	Health, Safety and Environment
IFC	International finance Corporation
KNCL	Kabanga Nickel
LGA	Local Government Authorities
NEMC	National Environmental Management Council.
RA	Regional Administration
RC	Regional Commissioner
RMO	Regional Mining officer
RWG	Resettlement working group
SES	Stakeholder Engagement Standard
SGBV	Sexual and gender-based violence
TEITI	Tanzania Extractive Industries Transparency Initiatives
TLAP	Temporally land access procedures


## 2. DEFINITIONS

Table 2: Definition Table

Term	Definition
<b>Community</b>	A group of people with a common characteristic or interest living together within a larger society
<b>Community development</b>	Refer to the deliberate efforts intended to empower community members and create stronger and more connected communities.
<b>Community engagement</b>	Refer to the process of ensuring the project-affected people are fully informed and have chances to be heard. This offers rooms for open communications, discussions, and dialogues.
<b>Community-based policing</b>	This is a philosophy that promotes project strategies that support the systematic use of partnerships and problem-solving techniques to proactively address the immediate conditions that give rise to public safety issues such as crime, social disorder, and fear of crime.
<b>Consultation</b>	It entails a more formal two-way communication between the company and stakeholders, with the company agreeing beforehand

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	to consider adjusting project plans depending on the outcome of the consultation.
<b>Grievance</b>	a complaint or a strong feeling that you have been treated unfairly:
<b>Grievance management</b>	Process on how the project manages and redress the community/stakeholder's complaint/grievance
<b>Human right</b>	are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status
<b>Human right due diligence</b>	Refers to all processes involving the actions taken by a company to both identify and act upon actual and potential human rights risks for workers in its operations, supply chains and the services it uses.
<b>Information Disclosure</b>	Share/circulate the information
<b>Not a one-off event:</b>	This defines continuous events for instance stakeholder engagement is the continual events.
<b>Participation</b>	<p>Is it a process during which individuals, groups and organizations are consulted about or could become actively involved in a project or program of activity?</p> <p>Either participation in social sciences refers to different mechanisms for the public to express opinions – and ideally exert influence – regarding political, economic, management or other social decisions</p>
<b>Sexual and gender-based violence (SGBV)</b>	Is violence committed against a person because of his or her sex or gender. It is forcing another person to do something against his or her will through violence, coercion, threats, deception, cultural expectations, or economic means.
<b>Social impact management</b>	It is an ongoing practice of measuring and improving social investment outcomes to reduce negative and increases positive impacts of project activities.
<b>Social impacts</b>	A significant, positive change that addresses a pressing social challenge.
<b>Social performance</b>	Is the outcome of a company's engagement, activities, and commitments that can directly and indirectly impact stakeholders or affect the quality of its relationships with them.
<b>Social risk</b>	Any potential harm to the community or any intended or unintended actions which can adversely impact the livelihood or existence of society.
<b>Stakeholder</b>	Are there any individuals or groups that can help define value propositions for the project? Other stakeholders are organizations and institutions that have an interest in the business; they influence the decision-making process for the company and are either directly or indirectly affected by the company's operations.
<b>Stakeholder Communication</b>	Any manner of information sharing with stakeholders, generally through one-way, non-iterative processes. It aims to convey information about itself, its products, plans and viewpoints to those who want to know and those it seeks to influence. Communication

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	can be divided into two main parts: internal and external communication.
<b>Stakeholder Consultation</b>	The process of gathering information or advice from stakeholders and considering those views to amend internal plans, make decisions or set directions so that such accommodate stakeholder consultation views.
<b>Stakeholder Dialogue</b>	An exchange of views and opinions to explore different perspectives, needs and alternatives, with a view to fostering mutual understanding, trust and cooperation on a strategy or initiative.
<b>Stakeholder Engagement</b>	Stakeholder engagement is an umbrella term that covers the full range of an organization's efforts to understand and involve stakeholders in its activities and decisions
<b>Stakeholder engagement Standard (SES)</b>	Is a document that shows how stakeholders are involved and their influences on the project. It also outlines your stakeholder communication plan, including when you'll reach out to each stakeholder, what platform you'll use, and how much information you'll deliver
<b>Stakeholder Management</b>	Refers to the processes and behaviours by which a firm influences its relationships with its multiple stakeholders or constituents that affect and are affected by the achievement of its goals.
<b>Temporally land access procedure</b>	Process of accessing the permit to use land for a certain purpose.


### 3. INTRODUCTION

A vital objective for the Tembo Nickel Corporation (Tembo Nickel) is to ensure that the management of internal and external affairs maintains a positive policy and regulatory environment that fosters collaborative relations within the host country and communities throughout all phases. This requires consistency of messaging and dialogue with all levels of government and across the full range of stakeholders from the national level down to the village and hamlet level.

In developing the company's social management plan, Tembo Nickel will be guided by its Sustainable Development Policy and Sustainable Development Standards. The company intends to be an active participant in the sustainable development of the surrounding communities and the district of operations, in partnership with project-affected people, Local Government Authorities (LGA), Regional Administration (RA), National Government, Non-Governmental Organizations (NGOs) and other Civil Society Organizations (CSOs). This collaborative approach is reflected in the Tembo Nickel Community Development Plan.

Tembo Nickel's Social Performance plan is structured around four key areas:

- Social impact mitigation and benefit enhancement,
- Local stakeholder engagement,
- Community development, and
- Resettlement planning and implementation.

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The program is based for now on previous project owners' four corresponding key plans:

- Social Management Plan (Environmental Impact Statement (EIS) Section 6.4)
- Local Stakeholder Engagement Plan (this document)
- Community Development Plan (COM-PLN-40203)
- Resettlement Action Plan (COM-PLN-40200)

#### 4. STAKEHOLDER ENGAGEMENT

Stakeholder engagement is about building and maintaining constructive and sustainable relationships. It is an ongoing process between a company and its stakeholders that extends throughout the life of the Project and encompasses a range of activities and approaches, from information sharing and consultation to participation, negotiation, and partnerships. The nature and frequency of this engagement should reflect the level of project risks and impacts.

This Project-wide Stakeholder Engagement Standard (SES).

Describes both regulatory and Tembo requirements for consultation and disclosure,

Identifies key stakeholder groups,

Outlines the strategy for sharing information and consulting with these groups,


Describes the resources and responsibilities for implementing stakeholder engagement activities, and

Describe how local stakeholder engagement activities will be incorporated into Tembo Nickel's management system.

#### 5. OBJECTIVES

The purpose of SES is to describe Tembo's strategy and program of engaging with stakeholders in a culturally appropriate manner. The goal is to ensure the timely dissemination of relevant and understandable information. It is also to create a process that provides opportunities for stakeholders to express their views and concerns and allows the company to consider and respond to them.

Stakeholders include all external organizations and individuals who may be affected by the Project, may affect the Project or who have an interest in the Project. The standard sets out the Project's approach to ensure robust engagement with different stakeholders in accordance with Tanzanian legislation and Tembo shareholder requirements (described further in Section 2). It builds on the existing public consultation and disclosure practices which have been followed to date during planning for the previous Kabanga Nickel Project and now under Tembo Nickel's project ownership.

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## 6. KEY PRINCIPLES

The key principles of effective engagement on which this standard is based are:


- Providing meaningful, timely information in a format and language that is readily understandable and tailored to the needs of the target stakeholders.
- Providing information in advance of decision-making so that views expressed can be considered.
- Disseminating information in ways and locations that make it easy for all stakeholders to access it, including women and vulnerable groups.
- Demonstrating respect for local traditions, languages, timeframes, and decision-making processes.
- Ensuring two-way dialogue so both sides have the opportunity to exchange views and information, to listen, and to have their issues heard and addressed.
- Ensuring inclusiveness in participation, including women and vulnerable groups.
- Ensuring engagement processes are free of manipulation, intimidation or coercion.
- Maintaining effective mechanisms for responding to people's concerns, suggestions, and grievances.
- Incorporating feedback into the project and program design and reporting back to stakeholders.
- Practice respect for stakeholders' individual integrity in handling the information collected by storing the documentation appropriately. A clean desk policy should always be practised.

## 7. SCOPE

This SES is a live document that will be adapted progressively and updated as the Project moves forward through the various phases of implementation. It focuses on the stakeholders in the surrounding area of the Project, settlements, resettlements, sub-villages, villages, and the Wards This includes the Ngara district, the Kagera Region and their LGA, RA and Civil CSOs. The standard also includes the national level, Government, International Donors, NGO's and the Media. The national level is primarily managed by the Country Manager and the Head office in Dar es Salaam. This level is also part of External Relations, an overlap that needs to be coordinated.

This is addressed in the Government Relations and External Affairs (Feasibility Study 1733-STY-001 Section 5)

Project affected communities in Ngara District.

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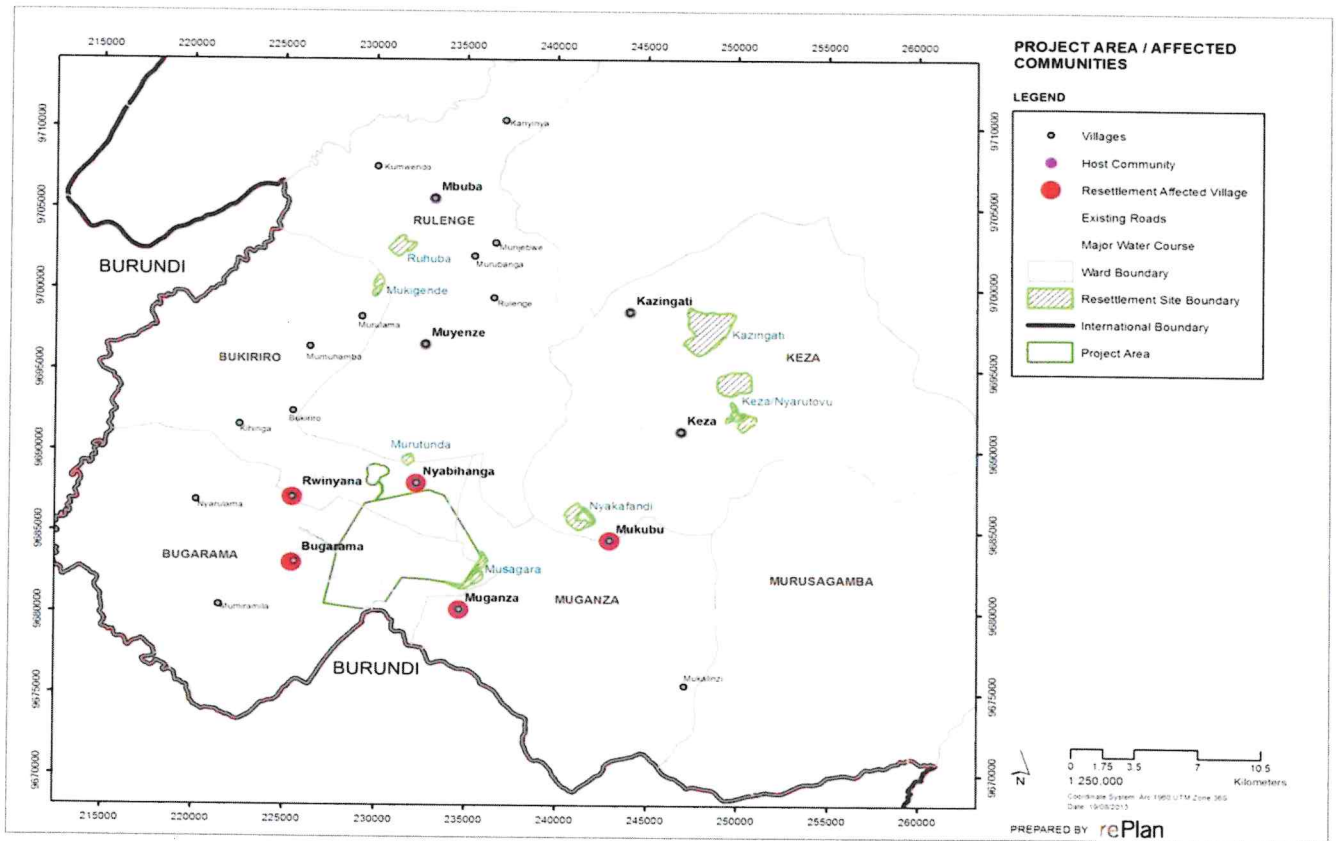


Figure 1: A map showing project area affected communities.

## 8. REGULATIONS AND REQUIREMENTS

This section summarizes the requirements of the Government of Tanzania and of Tembo Nickel pertaining to local stakeholder engagement.

### 8.1 Government of Tanzania Requirements

For mining projects, the Tanzanian law sets out legal requirements for public consultation and disclosure:


As an integral part of the Environmental and Social Impact Assessment (ESIA) process.

Before land acquisition and compensation

Regarding local content and community development

### 8.2 Tanzanian Mineral Policy 2009

The Mineral Policy (2009) was developed by the Ministry of Energy and Minerals to replace the previous Mineral Policy of 1997. It was adopted by the Government of Tanzania in September 2009. Section 5.9 concerns the promotion of constructive relationships between mining companies and communities surrounding the mines. It states that mining companies

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can contribute to the development of local communities through Corporate Social Responsibility policies but that poor communication between companies and communities can result in the implementation of company-led projects which are not aligned with the community's priorities. It emphasizes the need for maintaining a "formal communication mechanism" between a mine and the local community through the planning and subsequent phases of mining project development.

Also, the Mining Act of 2019(CAP.123 Rev. 2019 (chapter VIII) on the local content and corporate social responsibility. Both the Mining Act and policy stressed on the role of mining to promote and build a constructive relationship between mining and stake.

### 8.3 Impact Assessment

The Project's Environmental Impact Statement (EIS) will describe in detail the public consultation process that was undertaken during the ESIA as required under the Environmental Management Act (2018) and the associated Regulations. The Project's Social Management Plan, of the EIS, will make specific commitments to:


- Conduct regular local village and government consultation throughout the life of mine.
- Develop a public disclosure program for monitoring results.
- Provide communication and consultation training to staff interacting with local communities.
- Develop and maintain a communications database (i.e., Stakeholders master list)
- Develop and communicate a community grievance procedure. (i.e., Grievance SOP)
- Develop and communicate a mobile unit procedure. (i.e., Mobile unit SOP)

### 8.4 Land Acquisition

The Government of Tanzania (GoT) also requires specific stakeholder consultation in the case of involuntary land acquisition. Article 95(1)(b) of the Mining Act (2018) requires that the holder of a mineral right engage in "thorough consultation" with the relevant local government, including the Village Council, before exercising any of his rights, and obtain written consent for any land use plan, compensation, relocation, or resettlement involved. Article 97 requires the holder of a mineral right, in consultation with the relevant local government, to manage any required relocation and compensation with the owner or occupier of land over which the mineral right extends, in accordance with the Land Act (1999) and the Village Land Act (1999).

### 8.5 Community Development

The Mining Act Cap.123, 2019, requires company contribution to the development of local capacities through local content and corporate social responsibility. Section 102 promotes the development of local content for the provision of goods and services. The mineral rights holders are required to give preference to goods produced or available in Tanzania. Goods that are not available in the country need to be provided through a local company. Section 103 – 104, requires the mineral rights holder to develop and submit a program for recruitment and training of Tanzanians and technology transfer in all phases of the operations. Section

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105. Stipulates that company community development plans, in the law referred to as the corporate social responsibility plan, must be based on locally identified priorities and approved annually by the local government authority in consultation with the Minister responsible for local government authorities and the Minister of Finance.

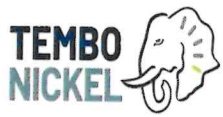
### 8.6 Transparency and Accountability

In addition to the above regulatory requirements, the Tanzanian Extractive Industries (Transparency and Accountability) Act 2015 reinforces stakeholder engagement by stating in section 10, (d) and (i) that the Tanzania Extractive Industries Transparency Initiatives (TEITI) committee is responsible for the promotion of effective citizen participation and awareness of resource governance and extractive industry companies and their contribution to socio-economic development. Moreover, section 5.5 of the TEITI founding law, requires that the composition of the TEITI Multi Stakeholder Group, the committee, is gender balanced. Section 16 stipulates extractive industries' obligations to publish information.

## 9. TEMBO NICKEL CORPORATION PERFORMANCE STANDARDS AND PRINCIPLES

Tembo Nickel is steered by international performance standards and principles and strives to contribute to the social and economic well-being of communities impacted by its operations through the following commitments:

- Encourage two-way engagement and dialogue to maintain constructive relationships and transparent communication with host communities.
- Communication with host communities.
- Listen to the priorities and concerns of local stakeholders, including vulnerable groups, in an open, culturally appropriate and gender-sensitive manner.
- Through training and capacity-building, assist local community members to capitalize on the local employment and procurement opportunities that the operation creates.
- Collaborate with local communities, Government authorities and other partners to enhance socio-economic well-being through sustainable development programs that address the needs and priorities identified by the local communities.
- Respect the human rights of all our stakeholders.
- Take accountability for all our actions and minimize any adverse impacts of our operations on the communities in which we operate.
- Address any grievances promptly, fairly, and consistently.
- Work proactively with communities to identify and manage social risks and to fulfil our mutual obligations.
- Minimize the requirement for, and mitigate the impacts of, physical and economic displacement.

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- Work throughout our operation to help our host communities prepare for the social and economic impacts of the eventual closure of the mine.
- Monitor our impacts and social performance with the goal of continuous improvement.

The company is guided by the International Council on Mining and Metals (ICMM), Sustainable Development Framework. This includes integrating a set of 10 principles and seven supporting position statements into corporate policy, as well as setting up transparent and accountable reporting practices. The tenth principle, which is most applicable here, requires that the company “implement effective and transparent engagement, communication and independently verified reporting arrangements with our stakeholders.” *IFC, UN Guiding principle for business and human rights, and equatorial principle (EP4)*

Furthermore, the company recognizes that much can be learned from the best practices guidance that international standards and principles. Chief amongst these for the private sector are the IFC’s Performance Standards and good practice handbooks.

According to the UN guiding principles for human rights and business with its three dimensions of respect, protection, and remedy. Tembo Nickel is focused on ensuring the compliance of human rights in all sectors from supply chain, administration, operational and management. The procedures and policy are well established to ensure the human rights due diligence.


Concerning resettlement, the Project developed a Resettlement Action Plan, 2013, which is in the process of being revised and updated in accordance with IFC PS 5: Land Acquisition and Involuntary Resettlement. The main objectives of PS 5 are to avoid where possible, and minimize, the need for involuntary resettlement and to mitigate the adverse social and economic impacts of land acquisition or restrictions on affected persons’ use of land. This includes ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected. It also requires the establishment of a grievance mechanism to receive and address concerns specific to compensation and resettlement.

## 10. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

### 10.1 Overview

Before 2007, local stakeholder engagement activities were conducted by the site Administration department. The Kabanga Nickel Community Relations (CR) department was established in 2007 and more structured consultations commenced. At that time the CR department had four team members, a CR Coordinator and three CR Officers, reporting to the Site Manager.

To date, consultations with local stakeholders have identified strong support for the Project, particularly as Ngara District currently has few other large-scale economic opportunities. However, people in Ngara District and particularly in the villages potentially affected by the Project are increasingly voicing impatience with the slow pace of Project development. Others voice skepticism, observing that there has been mineral exploration activity at the Project site since the 1970s and no mine development has occurred to date. This situation requires that

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the CR team continuously share information with local stakeholders on the current project status and developments.

A key point for the LGA and community members is the extent to which the Project will contribute to a sustained improvement in the living standards of the local community through its employment of local people, procurement of local goods and services, and community development activities. Expectations are high and managing these is a key focus of Tembo Nickel's stakeholder engagement program.

The process of forming and maintaining good relationships with key government officials at district, ward and village levels is well established. The district and local authorities are a mixture of appointed administrators and elected officials and a key source of information about community issues and expectations. Meetings were held frequently with local officials, to share information about the company's plans and to provide a forum for local officials to discuss their understanding of, and expectations for, the Project.


The main consultation and disclosure methods used by the CR team to date include:

- Town Hall meetings.
- Site visits by stakeholders.
- Official presentations to key stakeholders.
- Participation by CR staff in broader community meetings and events.
- Focus group discussions.
- Individual meetings.
- Briefings on Radio Kwizera based in Ngara town.
- Posting of information on 21 notice boards which have been erected in the community and distribution of fliers with specific themes/messages.
- Mobile Unit,
- Resettlement working groups,
- Stakeholder meetings (village, ward, district, Regional and national events/festivals)
- District Regional and National Events/ Forums

The method of engagement at any given time has been tailored to the stage of the project and the stakeholders affecting and affected by.

## 10.2 Exploration Phase

During the exploration phase, the CR team conducted broad engagement in all 18 villages in the four local Wards. The CR team facilitated the Geology department, consultants, and contractors to conduct geophysics and drilling programs over a broad geographic area. Before any exploration activities, the CR team conducted consultations with landowners, local leaders, and community members to inform them of upcoming activities and to assess the possible social impacts or risks. This process was guided by the Kabanga Nickel Project "Land Acquisition Procedures" from 2012.

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To reach a broader range of stakeholders, Town Hall Meetings were conducted on an annual basis in the 18 villages and key stakeholders were invited to visit the Project site to receive updates. Occasionally, Radio Kwizera was used to convey key project information and to answer questions from listeners. CR team members were also invited to attend regularly scheduled meetings of ward development committees, village development committees and village councils.

### 10.3 ESIA Process


**Section 5.10** of the Project's Environmental Impact Statement (EIS) describes in detail the public consultation process that was undertaken during the ESIA as required by the Environmental Management Act (2018) and Regulations. The aim was to provide information about the Project and to understand potential impacts and opportunities as perceived by local communities and other stakeholders. This enabled these issues to be considered in developing the Project design and mitigation measures to minimize adverse impacts and maximize benefits. ESIA engagement activities also provided an opportunity for affected and interested people to express views and concerns about impacts and mitigation measures and allowed the Project to consider and respond to these in developing the Social and Environmental Management Plans.

An initial assessment of local stakeholders and their specific issues was carried out by Golder & Associates (Golders) in 2006. Extensive consultations were then undertaken by Golders with the facilitation of the CR team. Local community presentations were developed and delivered in Swahili and, when requested, in Shubi.

During the ESIA consultation process, residents of villages adjacent to the Project frequently identified concerns regarding water quality/quantity, resettlement, and compensation, in migration and its effects, employment, including equitable, transparent and gender-sensitive employment and the value to villages of Project physical infrastructure. People in local villages had high expectations that the Project will aid in such priority areas as improving the delivery of education and health services and improving livelihoods. The demand for more information on the Project as it moves forward was also evident. People from villages along the access road suggested that the Kabanga Nickel project improve the access road to benefit their villages. There were also concerns about the effects of heavy truck traffic and the risk of accidents, given that the access road is used as a path by many, including schoolchildren.

Additional local stakeholder meetings were held as part of the ESIA process when details of the Project changed and when the results of studies on the environment and the potentially affected villages were available. Over 170 consultation meetings were held in 2007, 2008, 2009 and 2011. On completion of the draft EIS in early 2012, feedback and consultation sessions were held in all potentially impacted villages, down to the sub-village level. The geographic focus of local community engagement was narrowed following the results of the ESIA from all 18 villages within the four neighbouring wards to the following:

- 6 villages within or adjacent to the Project, including their sub-villages.
- 3 villages along the north access road to Rulenge, and
- 6 villages along the south access road to Nyakahura.

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## 11. RESETTLEMENT PLANNING 2013

Five villages (Bugarama, Rwinyana, Nyabihanga, Muganza and Mukubu) have administrative control over land inside the Project Area. Prior to the start of construction of the initial facility, households in this area will need to be resettled. Consultation with impacted households and local government authorities has been underway since 2007 when a Resettlement Working Group (RWG) was established to collectively develop a resettlement strategy.

A Resettlement Action Plan (RAP), consistent with Tanzanian regulatory requirements and the IFC's Performance Standard 5: Land Acquisition and Involuntary Resettlement, was completed in 2013 and is included as an appendix to the Project Execution Plan. As described in Section 5 of the RAP, effective stakeholder engagement and consultation is a cornerstone of resettlement planning. Kabanga Nickel's (KNCL) consultation process, adapted from IFC's performance standards, is based on:

- Inclusiveness, transparency, and trust.
- Appropriate communication mechanisms.
- Systematic sharing of information and two-way dialogue.

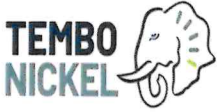
RWG meetings played a central role in ensuring that the resettlement consultation process conformed to these principles. The RWG was initially established in late 2007 and met six times between February and June 2008 and again in May 2011 to:

- Define principles for resettlement,
- Define eligibility criteria for resettlement entitlements, and
- Debate and endorse the entitlements.

In 2011, given the time that had elapsed and the changes to the Project Area (and hence the households that will be affected), it was necessary to negotiate an updated Entitlement Framework with the RWG. The RWG was reconvened in July 2012 and elections were held to adjust its membership to reflect changes to the Project Area. Monthly two-day negotiation sessions were held over a one-year period until the revised Entitlement Framework was agreed in July 2013. Minutes were prepared and circulated following each RWG meeting and resettlement staff members assisted the RWG community representatives to give feedback to the potentially affected households that they represent and to solicit their opinions.

Summaries of agreements reached in each RWG meeting were posted on notice boards in the affected sub-villages. Specific focus group discussions were held with groups of affected women and youth to ensure that their perspectives were sufficiently incorporated into the resettlement planning process.

It is inevitable that during a resettlement planning and implementation process, some complaints or grievances will be raised by stakeholders. If a grievance cannot be resolved immediately through the Project's grievance mechanism, it can be referred to an independent Dispute Resolution Panel which was elected in 2012 by the RWG. The Panel will provide nonbinding advice to the two parties and an individual will always maintain the right to legal redress under Tanzanian law. The approach for the management of resettlement-related grievances is described in Section 10 of the Resettlement Action Plan.

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As a result of resettlement planning the geographic focus of local community engagement was extended to include 3 potential resettlement host villages (Mbuba, Kazingati and Keza) which fall outside the 15 villages described above. The RAP process reached the point where entitlement frameworks were agreed upon and PAP signed compensation agreements when the project was cancelled. Goodwill payments were made to each compensation-eligible household, institution, and village.

### 11.1 Project and Ownership Changes

In 2014 the project was put on hold and the KNCL activities were reduced, including community engagement. When the project was acquired by Tembo Nickel a public announcement was made by the GoT in Bukoba in January 2021 with mine site communities attending.

In May 2021 Tembo Nickel initiated a resettlement scoping update study to review the needs for the Resettlement planning and implementation. Consultations with LGA and community leaders were made and despite reduced engagement and communication with the local communities there is still positive support for the project. However, with high expectations on employment, increased local business opportunities, community development support and resettlement compensations. There are some concerns over potential changes to the project and how it may affect community benefits. This will be addressed in the Tembo Nickel community engagement activities.

## 12. STAKEHOLDER ENGAGEMENT PROGRAM


### 12.1 Stakeholder Identification

The objective of stakeholder identification is to establish which organizations and individuals may be directly or indirectly affected (positively and negatively) by the Project, and those who may have an interest in the Project. Stakeholder identification is an ongoing process, requiring regular review and updates.

To develop an effective SES, it is necessary to determine who the stakeholders are, to understand their needs and expectations for engagement, and to understand their priorities and objectives in relation to the Project. This information is then used to tailor engagement to each type of stakeholder. It is important to identify individuals and groups who may find it more difficult to participate and those who may be differentially or disproportionately affected by the Project because of their marginalized or vulnerable status. For example, in using the Stakeholder mapping based on influence and interest those with limited influence in their communities and the ability to visible and vocally voice their interest may have the most to gain from active participation.

Project stakeholders have been and will continue to be identified continually by:

- Identifying the different categories of parties who may be affected by or interested in the Project.
- Identifying specific individuals or organisations within each of these categories considering:

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- The Project's anticipated impact area as determined through the ESIA process; and
- The nature of anticipated Project impacts as determined through the ESIA and resettlement planning.

Stakeholder identification and analysis will continue throughout the life of mine. A detailed, living list of local stakeholders is found in the Stakeholder Database, which is updated regularly by the CR team and summarized below.


There are three levels of government relevant to the Project: national, regional and local, The Project need to have regular interaction with all three levels, to ensure that the Project is well-understood by key policymakers and retains the support of its Tanzanian hosts at all levels.

## 12.2 National Government

As a partner in Tembo Nickel, the GoT is an internal and external stakeholder. Within the executive branch of the Government, the President, Vice President, and Prime Minister all take an interest in the Project and should be kept informed of its progress. All three attend occasional business roundtables and these can be opportunities for interaction with them. Visits to Tanzania by senior-level representatives from Tembo Nickel may also create opportunities for engagement with Tanzania's senior leadership.

The Ministry of Minerals is responsible for facilitating the development of the mining sector. Within the Ministry itself, the Minister of Minerals, appointed by the President, is responsible for administering the Mining Act, 2018 and its regulations, which comprise the principal legislation governing the mining sector. Under the Ministry sits the Mining Commission who assist the governing of the Mining sector at the national and regional level and has the specific role of monitoring the implementation of the local content regulations specific to the Mining Act 2018. In addition, their regional offices, the Resident Mines Office (RMO) and the Mines Resident Office (MRO) are responsible for monitoring at the mine site locations. Compliance inspections, auditing and revenue collections are done by the RMO while the MRO monitors production, storage facilities and transport. Given the Project's size and importance, regular interaction with the Minister of Minerals, Deputy Minister, and Permanent Secretary and the Chairman of the Mining Commission is required. Engagement with the Regional level is to be done by the Country Manager and the General Manager or other relevant company departments.

The National Environment Management Council (NEMC) has oversight over environmental issues related to the Project under the Environment Act (2021). Other government agencies which play a role include the Ministry of Infrastructure Development (rail and road transport), the Ministry of Finance, the Tanzania Revenue Authority (taxation), the Ministry of Home Affairs (security, visas), and various other agencies or departments which may be responsible for permitting Project activities. In preparation for the resettlement the Ministry of Lands, Housing and Human Settlements and the Government Chief Valuer are important stakeholders to meet to ensure they are well informed of the project ahead of implementation. There is also a requirement for the Project to consult with other Ministries and agencies, such as health, education, and local government, when it plans to be involved in community development projects in those sectors. Additionally, the Framework Agreement allows for

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increased GoT and LGA revenue, funds that should strengthen the drive for local content through improved access and quality of education and health services, a link that needs to advocate.

Generally, interactions with Tanzania's leadership down to and including the level of Permanent Secretary, should be handled by the Country Manager supported by the External Affairs team and other Project teams as needed. Similarly, written communications from the Project to the senior leadership down to the level of Permanent Secretary should normally be signed by the Country Manager. As a rule, written communications with the Minister of Minerals and the Chair for the Mining Commission should also be signed by the General Manager.

Below is an overview of Government Stakeholders, Regulations, and links to the mining sector. The Sub office /Commission and their respective Senior officials are naturally also key stakeholders as they are interconnected.

Table 3: Government Stakeholders, Regulations and link to the mining sector


Government Stakeholders, Regulations and link to the mining sector						
Stakeholder	Office	Purpose	Sub-office/ Commission	Senior Official	Regulation	Link
<b>The President</b>	The President's Office of Regional Administration and Local Government (PO-RALG - Tamesemi)	Regional Development Management and Administration	1. Regional Administration 2. Local Government	1. Regional Commissioner 2. District Commissioner	Regional Administration Act 1997 Local Government Finance Act 2019	Principal Representative of the GoT in the Region and Law and Order Power Revenue collection in the form of Service Levy and CSR oversight
<b>The Vice President</b>	The Vice President's Office	Union and Environment	1. National Environment Management Council (NEMC) 1.1 Lake Victoria Zone Office	Director General	The Environmental Management Act 2018	Environmental Enforcement, compliance, review and monitoring of Environmental Impact Statements.
<b>Minister of Minerals</b>	Ministry of Minerals	Administration facilitation of the development of the Mining Sector	1. The Mining Commission. Regional - 1.1 Residents Mines Office (RMO) 1.2 Mines Resident Office (MRO) 2. Tanzania Extractive Industry Transparency Initiative (TEITI)	Chairman Chairman	1. The Mining Act 2018 2. The Local Content Regulation 2018 Tanzania Extractive Industries Transparency and Accountability Act 2015	Issue Licences Monitor mine sites, compliance inspections, auditing and revenue collections.  Approve and monitor local content plans. Promotion of and reporting on extractive industries' transparency activities and finances

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Minister of Lands, Housing and Human Settlement	Ministry of Lands, Housing and Human Settlement	Administration and management of Land and Human Settlement	Property Valuation Unit	Government Chief Valuer	1. The Land Act 1999 2. The Village Land Act 1999 3. The Valuation Act 2016	Land Acquisition and Resettlement
Lake Victoria Basin Water Board Director	Lake Victoria Basin Water Board. (Part of the Nile Basin Initiative and the Global Water Partnership)	Water resources allocation, assessments, and monitoring. Water source protection and pollution control	Regional office in Bukoba, Kagera		1. The Water Utilization and Allocation Act 1974 2. Water Resources Management Act 2009	Water usage – the Kagera river basin. Kagera River is the largest river that drains into Lake Victoria. The rivers at the site are part of the Kagera River basin.

**Government Stakeholders, Regulations, and link to the mining sector**

Stakeholder	Office	Purpose	Sub-office/ Commission	Senior Official	Regulation	Link
Lake Victoria Basin Water Board Director	Lake Victoria Basin Water Board. (Part of the Nile Basin Initiative and the Global Water Partnership)	Water resources allocation, assessments, and monitoring. Water source protection and pollution control	Regional office in Bukoba, Kagera		1. The Water Utilization and Allocation Act 1974 2. Water Resources Management Act 2009	Water usage – the Kagera river basin. Kagera River is the largest river that drains into Lake Victoria. The rivers at the site are part of the Kagera River basin.
Minister of State, Prime Minister's Office Labour, Youth, Employment and Persons with Disabilities	Prime Minister's Office Labour, Youth, Employment and Persons with Disabilities	Labour, Youth, Employment and disabilities affairs			Employment and Labour Relations Act 2004	Labour law
Minister of State, Prime Minister's Office Labour, Youth, Employment and Persons with Disabilities	Occupational Safety and Health Authority (OSHA)	The agency is responsible for protecting workers against potential hazards at workplaces that can cause occupational diseases and accidents			The Occupational Health and Safety Act No. 5 of 2003	Enforcement and implementation
Director General	National Social Security Fund (NSSF)	To provide social security services			Nationally Social Security Fund Act 1997	Binding to pay into NSSF for all employees
Minister Finance	Ministry of Finance and Planning	National budgets and plans, allocations and Policies.				The National Five-Year Development Plans
Commissioner General	Tanzania Revenue Authority (TRA)	Revenue collection			1. Finance Act 2021	Administer and enforce revenue collection

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### 13. NATIONAL INSTITUTIONS, INTERNATIONAL DONORS, AND NGO'S

National-level engagements will primarily be managed by the Country Manager and the team in Dar es Salaam. However, it is important to have a holistic plan and approach to ensure that our communication and engagements with our stakeholders in Tanzania are coordinated and effectively managed within the company. Depending on the subject, the relevant project department needs to be involved in these engagements.

Engagement with International donors and NGOs in Dar es Salaam is important to ensure that community development initiatives are coordinated with national development plans and programs. These actors can play an important role in safeguarding that those activities are sustainably funded and supported. This can assist in reducing the risk of community dependency on the mine.

#### 13.1 Regional Administration

The Regional Administration (RA) relationship needs to be managed both by the Head Office in Dar es Salaam as well as the Mine Site management and the CR team depending on the issue. The most senior official in a region is the Regional Commissioner (RC), who is appointed by the President. In terms of protocol, RCs rank with Cabinet Ministers and have very broad responsibility for overseeing the implementation of government policy in their respective regions. The Project's interactions with the RC will be handled by the General Manager, supported by the Head Office and other Project teams as needed. Written communications from the Project to the RC should normally be signed by the General Manager.

The Regional Administrative Secretary (RAS) is the advisor to the RC and the executive of regional affairs in charge of development activities in the Region.

#### 13.2 Local Government Authorities


The CR team manages the Project's relationship with Local Government Authorities in the district, ward, and village.

The district and local authorities are a mixture of appointed administrators and elected officials. The senior official in a district is the District Commissioner (DC), who is appointed by the President. Local officials have a role in approving various Project activities and are key sources of information about community issues and expectations. Planning and administration for Ngara District is handled at the district level, including some discretionary spending authority for central government funds. While the district-level authorities have been given greater responsibilities, their financial and human resources have not kept pace. In addition, there are difficulties in attracting and retaining qualified and experienced staff in Ngara District.

The interaction between national and regional or district-level government authorities is complex, and the Project needs to remain in close contact with all levels of government on issues which could affect it.

#### 13.3 General Population of Ngara District

The general population of Ngara District is anticipated to be interested in:

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- Access to employment.
- Opportunities to supply goods and services.
- Improvements in public infrastructure and services.
- Potential social or environmental impacts.
- Utilization of the increased revenue to the Ngara District Authority through Service Levy payments (Paid every 6 months based on production) and Corporates Social Responsibility (CSR) funding (Allocated once a year based on production).

### 13.4 Affected Communities & Individuals

This group includes all people who may be directly or indirectly affected by the Project's presence and activities and their representatives (leaders and other influential people). It includes people living on land affected by the Project, either through land acquisition or by social and environmental impacts.

Table 4: key communities that have been identified as potentially the most affected.


	Affected village	Affected by land acquisition	Adjacent to the project area	On the north access road	On the south access road	Resettlement site
1	Bugurama	X	X			
2	Rwinyana	X	X			
3	Mumiramira		X			
4	Nyabihanga	X	X			
5	Muganza	X	X	x		
6	Mukubu	X	X			X
7	Bukiro			X		
8	Rulenge			X		
9	Muyenzi			X		X
10	Mukalinzi				X	
11	Murusagamba				X	
12	Ntanga				X	
13	Magamba				X	X
14	Kumubuga				X	
15	Nyakahura				X	
16	Ruhuba					X
17	Kazingati					X
18	Mukigende					x
19	Mbuba			x		

### 13.5 Local Non-Governmental Organizations

The Community Development Plan should identify all the non-governmental organizations (NGOs) operating within Ngara District and the potential roles they may take in delivering the Project's community development activities.

### 13.6 Local Businesses Enterprises

A range of local commercial organisations provide goods or services directly to the Project. A broader group of local companies have expressed an interest in the business opportunities

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that the Project will present in the future. As the Project develops and new contractors and service providers are identified, these businesses will likely become important stakeholders as they establish contractual relationships with the Project. The details of current and potential suppliers should be regularly updated by the CR team in collaboration with Supply Chain.

A South Korean company, Friiup Company Limited, has plans to invest in a large coffee plantation with an associated coffee processing plant in Kazingati Village, where the largest resettlement site of 513 hectares in the previous replan, RAP is located. According to Tanzania's IIP Media, the project would involve a USD 58 million investment and create job opportunities for around 3,000 people. Engagement and coordination with the company is required to understand the plans of the project.

### 13.7 Local Media

Neither television nor newspapers are produced in Ngara District, so Radio Kwizera is the only local public communication medium. It covers all of Ngara district, neighbouring districts and parts of Burundi, Rwanda and the Democratic Republic of Congo. Since radio plays a significant role in informing and shaping the opinions of government officials and ordinary citizens in Tanzania, it is a key stakeholder in the Project.

### 13.8 Engagement Mediums


As the Project moves into resettlement execution, the following consultation and disclosure.

tools will continue to be utilized by the CR team:

- Town Hall meetings.
- Site visits by stakeholders.
- Official presentations to key stakeholders.
- Participation by CR staff in broader community meetings and events.
- Focus group discussions.
- Individual meetings.
- Briefings on Radio Kwizera based in Ngara town.
- Posting of information on 21 notice boards which have been erected in the community and distribution of flies with specific themes/messages.
- Mobile Unit,
- Resettlement working groups,
- Stakeholder meetings (village, ward, district, Regional and national events/festivals)
- District Regional and National Events/ Forums

In addition, the following mediums will also be considered:

- Cartoons.

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- Brochures and newsletters.
- Community theatre.
- Radio programmes covering specific topics/messages.
- Models of the project site and mine infrastructure.
- Perception surveys.
- Various methods of participatory monitoring.
- Mobile phone messages
- Social media
- Suggestion boxes

#### 14. KEY FOCI FOR LOCAL STAKEHOLDER ENGAGEMENT

The Project is committed to continue engaging actively with stakeholders throughout the life of the Project, from execution readiness, through resettlement, mine construction, operations, and eventually closure and decommissioning. This SES will therefore be adapted as the Project moves through these stages. The aim will be to ensure that the Project remains in contact with all interested parties, is cognizant of their concerns, and addresses those concerns in an effective and timely manner.

Table 5: The main goals of local stakeholder engagement through all Project phases.

Project Phase	Key Local Stakeholder Engagement Activities
<b>Study Phase/Update phase</b>	Facilitation of geological studies ESIA consultations and feedback meetings Project Updates Grievance Management
<b>Execution Readiness Phase</b>	Facilitation of resettlement planning process Updates on Project approval processes Impact and Grievance Management Livelihood Restoration Plan readiness
<b>Resettlement Phase</b>	Facilitation of resettlement process Project updates Stakeholders' preparedness for the construction phase. Management of expectations; employment, procurement, and community development. Facilitation of other departments' programs. Road Safety awareness, community policing, local hiring process. Livelihood Restoration Plan implementation Impact and Grievance Management
<b>Construction Phase</b>	Facilitation of work by contractors Local hiring for the construction – with preference to resettlement affected people. Updates on construction Stakeholders' preparedness for the operation phase Impact and Grievance Management
<b>Operation Phase</b>	Maintain stakeholder support for Project operations. Stakeholder preparedness for closure Impact and Grievance Management

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<b>Closure Phase</b>	Facilitation of transition of ownership of community development programmes to appropriate stakeholders in cases where this has not already taken place (e.g., government or community) Facilitation of HSE activities on implementation of the Closure Plan Impact and Grievance Management
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## 15. RESOURCES AND RESPONSIBILITIES

### 15.1 Management Functions

#### 15.1.1 Social Performance


For local stakeholder engagement to be integrated into the Project's environmental and social management system, the CR team sits within the Social Performance department. The Social Performance department is led by the Chief Sustainability Officer. The department is guided by Tembo Nickel's Sustainable Development Policy and has three functions: Community Relations, Community Development, and Resettlement. This is organized under one Community Relations Team with Senior Officers to lead and coordinate community engagement, development, and resettlement. The purpose of this structure is to accommodate Tembo Nickels's internal growth and the project development during the changes. Community relations are the foundation for collocative engagements, development, and resettlement.

#### 15.2 Community Relations Team

There has been a varying number of CR personnel at the Project site since 2007. The Tembo Nickel team consists of 1 CR Manager, 2 CR leads, 3 Senior CR Officers, 10 CR officers and 2 interns. A proactive approach has been taken to identifying suitable new CR team members from the local community. The CR- Manager is the main point of contact for district-level officials, and this role is assumed by the CR- Leads in the absence of the CR Manager.

The CR team has the following responsibilities:

- Implementing local consultation and engagement activities to ensure social performance is achieving its objectives,
- Providing ongoing information to the Project on perceptions and feedback of local, Stakeholders, particularly on social impact mitigation in close liaison with the Occupational Health & Safety and Environmental teams (refer to Chapters 8 and 10 of the Feasibility Study),
- Providing relevant information on social incidents and local sentiment to the Security team (refer to Chapter 9 of the Feasibility Study),
- Liaising with Human Resources on the local employment strategy and cross-cultural training program (refer to Chapter 7 of the Feasibility Study),
- Liaising with HQ in Dar es Salaam to ensure the Project maintains a consistent communication approach at all levels of government (refer to Chapter 5 of the Feasibility Study),
- Facilitating the activities of the Community Development and Resettlement teams to ensure that the company's messaging to local stakeholders remains consistent,

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- Acting as the primary point of liaison for local Government stakeholders at the district, ward and village levels,

Ensuring that local stakeholders understand how to use the grievance mechanism and that grievances are managed appropriately, and

- Maintaining records on local stakeholder engagement including the stakeholder database, the Commitments register and the TLAP.

### 15.3 Alignment & Facilitation

Community Relations need to be integrated into the core activities of the project to safeguard collaborative opportunities and effective impact management. In addition to facilitating the work of the resettlement and community development teams, the CR team also plays a facilitation role for other Tembo Nickel departments as detailed below.

### 15.4 Corporate Office

The Corporate Office need to keep the site-based CR team informed of key developments in the broad government relations and communications environment, and the CR team need to keep the Corporate Office abreast of important interactions with the local authorities and communities and of any issues which could potentially come to the attention of the national government or national media. After each interaction with a key local stakeholder, the CR team completes a report which is circulated to the Corporate Office and filed for future reference. For its part, the HQ keeps the CR team informed of its key interactions with the government authorities at the national and regional levels and with national media. This is important to ensure a joint effort of the operations build-up.

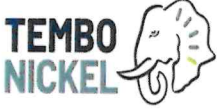
### 15.5 Operations Activities

The CR team need to facilitate other departments and contractors with the Temporary Land Access Procedures (TLAP) for drilling, access roads to drilling sites and other project activities that are outside of company license boundaries. The TLAP can be used for exploration/surface drilling before land acquisition as well as for other activities that require temporary usage of another landowner's property. The purpose of the TLAP is to reduce adverse impacts of project operations and ensure that the temporary access to land owned by members of the community is inclusive, transparent, and managed with accountability.

All contractors must meet the CR team for an induction to Tembo Nickel CR procedures. No contractor is allowed to proceed with their contracted duties outside of the camp before the induction has been completed. Depending on contractor tasks, engagements with relevant LGA and members of the community may be required before the contracted work can commence. This will be facilitated by the CR team.

### 15.6 Site Management

The CR team and Site Management have a mutually reinforcing relationship that includes support and engagement for all internal and external community-related issues. As needed, Site Management attends official meetings and public consultations, as possible, as the

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highest-level representative of the Project and ensures smooth coordination between Project functions.

### 15.7 Health, Safety and Environment

Health and safety of the local employees is a contributing factor to the overall productivity of the workforce. The CR team provides support to the HSE department to assist with raising awareness and message delivery in a manner that is appropriate and respectful of the local culture. The CR team also facilitates the implementation of the community health and safety programs in the communities around the Project.

When activities have the potential to impact the local environment the CR team works with the Environmental department to address those impacts. For its part, the Environmental department proactively engages the CR team to assess the type and level of community impacts an environmental activity may cause.

### 15.8 Human Resources

HR policies and management plays a fundamental role in our community relations as local staff are both internal and external stakeholders. Our staff need to be seen as our key champions of the project. Moreover, the CR team play a vital role in supporting HR in the implementation of the Project's local employment strategy in a way that is fair and transparent and contributes to maximizing the economic benefit of the Project's presence for the local communities. Furthermore, local employment is part of the local content plan as stipulated in the Mining Act, of 2018, and its Local Content regulation.

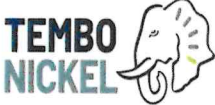
### 15.9 Supply Chain

Those responsible for Procurement and Contracts engage the CR team to advance the Project's goal to maximize local procurement and contracting in line with the Mining Act, of 2018, and its Local Content regulation. This includes facilitating the identification of local businesses as well as sharing with local stakeholders the business opportunities that the Project presents.

### 15.10 Security

The CR team, in collaboration with the Security department, works with the local government authorities to identify areas of cooperation and to provide support to strengthen local capacity in inclusive community-based policing programs (CBP). The CR team also shares with the Security department any relevant information that it receives from local stakeholders.

**NOTE:** Specific measures, and forums, need to be developed to address gender dimensions of security. Multiple studies highlight the structural changes that the introduction of mining can bring, with the shift from subsistence to cash economies often leading to tensions within families around how money is managed, which in turn can lead to increased Sexual and Gender-Based Violence (SGBV). The resettlement is the start of this type of shift. This is further compounded by the associated influx.

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### 15.11 Contractors

All Project contractors conducting work outside the camp are required to meet with the CR team before the commencement of any fieldwork for an introduction to the area, company code of contact and standard operating procedures with regard to community relations. This enables the CR team to assess if the activity could have any impact on external stakeholders and to identify suitable mitigation measures and engagement requirements.

## 16. GRIEVANCE MECHANISM

### 16.1 Overview

In accordance with international good practice, Tembo Nickel has an established mechanism for dealing with grievances about the Project. A grievance is defined as a complaint or concern raised by an individual or group who believe that they have been adversely affected by the Project.

Grievances should be addressed promptly using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of affected communities, at no cost and without retribution. Whether the concern is an actual problem or a perceived one, it needs to be addressed with respect. The mechanism should be appropriate to the scale of impacts and risks presented by the Project and beneficial for both the company and stakeholders. The mechanism must not impede access to other judicial or administrative remedies. Grievances are monitored to provide signals of any escalating conflicts or disputes. The Grievance Mechanism should be re-confirmed and widely publicized.

A Grievance Resolution Officer (GRO) on the Community Relations team leads this process.

### 16.2 Guiding Principles

Tembo Nickel's grievance mechanism is based on the following principles:

**Transparency, fairness, and cultural appropriateness:** The process for grievance resolution is transparent and considers local values and languages.

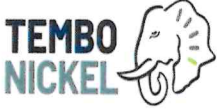
**Accessibility:** Any individual or group that is directly or indirectly affected by the Project's and its contractors' activities, as well as those with an interest in the Project or the capacity to influence its outcome, either positively or negatively, can raise a grievance. Town Hall meetings have been held to inform local stakeholders about the mechanism.

**Openness and communication regularity:** There are multiple channels available for lodging grievances:

- Toll-free number
- Suggestion boxes
- Through the village or district authorities' meeting
- Tembo Nickel/contractors staff

**Written records:** All grievances are registered and tracked through to resolution.

**Dialogue and site visits:** All grievances are considered to warrant discussions with the complainant.

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Timely resolution: The Project aims to resolve all grievances within 30 days.

NOTE: Specific efforts should be developed and available to ensure women and vulnerable groups have access to the Grievance Resolution Mechanism and relevant CR officers.

### 16.3 Process

The grievance mechanism process has five stages:

- 1) Publicizing grievance procedures
- 2) Receiving and recording the grievance, acknowledge receipt and keeping track of grievances.
- 3) Review and investigate grievances.
- 4) Develop resolution options and prepare a response.
- 5) Monitor, report and evaluate GM.

Grievances may be lodged in person, by telephone or in writing, or through the village or District authorities. All Project staff are aware that they must pass all submissions that could be considered to form a grievance to the CR team as soon as possible. Village leaders and government departments have also been advised to pass any grievances they receive to the CR team. The GRO records each grievance including the name of the village, the date recorded, the name of the complainant, the name of the person who received the grievance and the substance of the grievance.


The GRO then organizes a meeting with the complainant to assess the validity and severity of the grievance. The meeting will take place within seven days of receiving the grievance. The GRO will then work with other relevant members of the Project team to investigate the problem and to identify measures to resolve the grievance as appropriate. This could involve the provision of information to clarify the situation, undertaking measures to remedy actual problems, compensation (either financial or in-kind) for any damage or loss, and/or introduction of mitigation measures to prevent a recurrence of the problem. Where a grievance is determined to be unfounded a clear explanation is provided to the complainant.

A formal response detailing how the grievance has been resolved is provided to each complainant within 30 days whenever possible. It is advised that all responses are also conducted in person to ensure the individual grievant receives and understands the response and can raise potential questions. Where resolution is delayed the complainant is provided with regular updates on progress.

## 17. MOBILE UNIT OUTREACH

### 17.1 Overview

Tembo Nickel through a community relation team focused on maintaining consistency of communication to respective Tembo Nickel stakeholders for shared and mutual understanding. Communication messages are not limited to project updates, beneficiaries, location, project commencement and completion time/month, involved partnerships, and major project milestones. On the other hand, Tembo Nickel committed to informing stakeholders, both internal and external, about the expected consequences of the project. Tembo Nickel believes that achieving meaningful results requires thorough communication at the grassroots when such milestones are delivered.

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This will enable the community dialogue, which is based on trust, transparency, and honesty from strong relationships with the community and other stakeholder groups throughout the life cycle of the project. Mobile unit outreach intends to

- Carry out specific engagement activities with priority stakeholder groups at regular time intervals and ensure consistent representation from the community at these regular meetings.
- Facilitate community dialogue and provide consistent messages to stakeholder groups through public disclosure of information, so that stakeholders understand the potential risks, benefits, impacts and opportunities of the mine.
- Contribute to the wide coverage of Tembo Nickel procedures, updates, policies, progress, and its contribution to the surrounding community.
- Ensure effective engagement with those identified as disadvantaged or vulnerable.
- Increasing meaningful participation of community members in the program which fosters community ownership and local governance of activities to empower.

The approach will cover the scope of community engagements at all levels.

## 18. MONITORING & EVALUATING OF STAKEHOLDER ENGAGEMENT ACTIVITIES


It is important to monitor and evaluate stakeholder engagement to ensure that consultation and disclosure efforts are effective and that key stakeholders such as local communities, have been meaningfully consulted through the process. This will include:

- Monitoring the effectiveness of engagement processes in managing impacts and expectations by tracking feedback received from engagement activities and recording and tracking commitments made to communities.
- Monitoring formal and informal consultation activities conducted with communities and government authorities.
- Monitoring any grievances received and their resolution and identifying any trends in the nature of the grievances.
- Auditing implementation of the SES

### 18.1 Reporting Stakeholder Engagement Activities

The performance will be reviewed quarterly against this SES. Quarterly reports will include, but not be limited to:

- Materials disseminated: types, frequency, and location.
- Place and time of formal engagement events and level of participation including by specific stakeholder groups (e.g., women, vulnerable groups).
- Comments received by government authorities, village leaders and other parties and passed to the Project.
- Numbers and types of grievances and the nature and timing of their resolution.

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- Develop a social accountability project for community feedback –community-driven monitoring of mine and local government governance.
- Quarterly reports will summarize all activity for the period. They will provide a summary of issues raised and how they have been addressed, including timeliness of responses and remedial, compensation and mitigation measures to address the grievance. Finally, they will analyse trends in key performance indicators including:
  - Total numbers of stakeholders engaged in each group,
  - Geographic location of stakeholders across the Project footprint and elsewhere,
  - Numbers of comments and queries received, and responses given,
  - Issues raised and levels of support for and opposition to the Project,
  - Numbers of grievances lodged, and
  - Time required for the resolution of grievances.

All stakeholder engagement activities should be captured in a database that is linked to a geographical information system together with all other Tembo Nickel activities. A map that visualizes engagements, community development, resettlement, grievances, local employment, local procurement etc. would provide a holistic picture of the project’s community investments and impacts. This would also facilitate the identification of systematic issues that require review and change of approaches.

## 19. SYSTEM EVALUATION

This plan shall be reviewed at least after two years by members of the Community Relations department and presented to the Standard Committee for approval, or when organizational changes take place or required as part of internal and external audits. The TNCL Document Controller will monitor compliance with the document control system on an ongoing basis.


## 20. DISTRIBUTION

List physical locations which require a controlled copy of this document.

Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System

## 21. CONTRAVENTION

Any breach of this plan shall be regarded as refusal/failure to carry out a lawful instruction and will be dealt with as per the disciplinary plan.

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## 22. DOCUMENT CHANGE PROCESS

The process of document change starts when the document custodian identifies there is a need to make changes within the document. The document custodian/ owner shall complete the document change request form, sign it off, and submit it to the Document Controller.

The Document controller shall issue the controlled word copy of the document to the respective document custodian/owner so that changes may be made. The document custodian/owner shall resubmit the updated document to the document controller so that the document can be controlled and updated within the Filing system ready for use by the end users.

### 22.1 Reason for Change

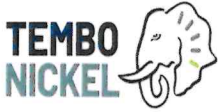
A	As a result of incidents	F	Change in training requirements
B	As a result of the audit findings	G	Results of risk assessments
C	New / changes in governance documents	H	Change due to spelling or grammatical error
D	Changes in legislation	I	New document format
E	Changes in technology	J	To integrate special instruction into the document control system

### 22.2 History of Change

Date of Change	Revision No	Revised Item (paragraph Number reference if required)	Reason Code	Name of Reviewer

## 23. RECORD CONTROL

Document Title:	Document ID:	Responsible for Maintenance:	Responsible for Filing:	Location of Storage:	Retention Period:	Method of Disposal:
Stakeholders Engagement Plan	TNCL-CRE-PLAN-0001	Document Controller	Document Controller	OHS Department	Hard Copy two Years	Hard copy shared file electronic

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## 24. DECLARATION

I hereby declare that I have taken part in the discussion of this plan, and I understand its contents and do commit that I shall ensure compliance hereto:

	Name and Surname	Company Number	Designation / Role	Signature	Date Signed
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