




Stakeholder Engagement Plan



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	Sustainability Stakeholder Engagement Plan	Twigg Exploration & Mining Limitada
		TWG-PL-SUS-0001_2
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1. INTRODUCTION

Syrax Resources Limited and its wholly owned subsidiaries is committed to sustainability and creating long term value for our shareholders. The Company must proactively engage with key stakeholders on an ongoing basis to manage / monitor business impacts, ensure mutual benefit where possible and, ultimately, to establish broad-based stakeholder support for the Balama Graphite Operation.

2. PURPOSE

The purpose of this SEP is to provide a structured approach for stakeholder engagement that will enable the Company to:

- Assign clear accountabilities and dedicated personnel to stakeholder management;
- Understand the needs and concerns of key stakeholders;
- Identify opportunities to work / collaborate with each other;
- Develop and maintain constructive relationships based on mutual respect;
- Communicate proactively and manage stakeholder expectations;
- Progress the strategic interests of the Company across all areas; and
- Monitor, record and report stakeholder engagement activity and performance.

3. DEFINITIONS AND ABBREVIATIONS

For the purposes of this plan, and consistent with International Finance Corporation (IFC) terminology, Stakeholders are persons or groups who are directly or indirectly affected by the activities of a project or business, as well as those who may have interests in the project or business and/or the ability to influence its outcome, either positively or negatively.


Engagement is a two-way process whereby information is exchanged, and ideas and concerns are communicated and genuinely considered to inform and guide key business decisions and activities.

4. SCOPE

This Stakeholder Engagement Plan (SEP) identifies key stakeholders of Twigg Exploration & Mining Limitada (The Company) including, but not limited to, local community groups, non-government organisations (NGO's) and district, provincial and central government authorities, and institutions.

5. ROLES AND RESPONSIBILITIES

The Company's Executive Committee (ExCo) is responsible for ensuring a planned and considered approach is taken to stakeholder identification and engagement, and this includes ensuring regular analysis is performed so that the importance / criticality of key stakeholders, linked to key business objectives, is well defined.

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Additionally, the ExCo will need to directly engage with central government authorities and other key stakeholders, regularly, to enhance and protect the Company's license to operate and to progress the strategic interests of the business. The ExCo shall keep the Board of Directors informed as to all material developments that may positively or negatively impact the Company.

General Managers and Managers (Senior Management) play a critical role as the primary interface with key stakeholders, in Mozambique, and must work proactively to maintain credible relationships founded on respect, transparent and timely communication, common goals and realistic expectations. Senior Management must adhere to the requirements of this plan, review / amend this plan regularly, and report all material issues as required.

6. STAKEHOLDER SUPPORT

There is often a great temptation to first attempt to generate support from government officials and political leaders, because it is less work to communicate with, and solicit support from, smaller groups. While this may work for select singular objectives, it is not the best method to secure 'license' for a large objective that will affect many people. Nucleating support 'upward' from a broad base of stakeholders who are 'closer to the action' is a better option.

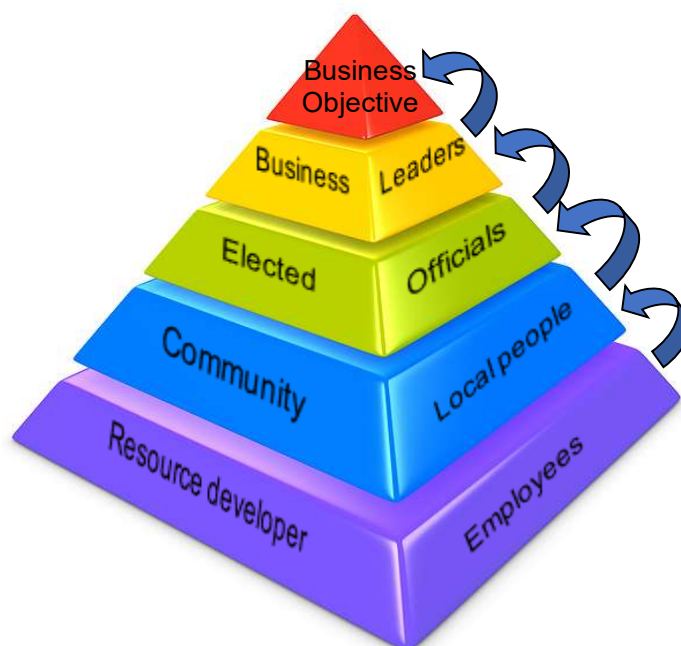



Figure 2: Building Stakeholder Support from the Bottom Up

7. STAKEHOLDER ENGAGEMENT PLANS


The following Stakeholder Engagement Plans (SEP's) have been developed relative to the social, cultural, political, and commercial contexts of Mozambique, as experienced by the Company. These SEP's are used to guide asset-level engagements / accountabilities and form the basis for associated monthly reporting.

a. HUMAN RESOURCES & TRAINING


STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Internal Union Committee	<ul style="list-style-type: none"> ➤ Act as the conduit between the workforce and management; ➤ Represent the ideas, aspirations, and concerns of the workforce; ➤ Help to communicate key organisational changes / developments to workforce; ➤ Help to educate workforce as to rights and restrictions under Mozambique Labour Law; ➤ Ability to create uncertainty and cause disruption to the employee relations environment at Twigg if the relationship is not managed effectively. 	<ul style="list-style-type: none"> ➤ To ensure alignment between Management and the Internal Union with respect to organisation developments, priorities and constraints; ➤ Build capability of the Internal Union Committee with respect to their roles and responsibilities under the Labour Law; ➤ Minimise employee relations disputes, risk of strike and maintain productivity of workforce. 	<ul style="list-style-type: none"> ➤ Quarterly face to face meetings; ➤ Documented agenda & minutes; ➤ Ad-hoc meetings following key organisational and or workforce developments / changes. 	People & Engagement Manager HRT Supt(s)	GM Operations
National Union of Building, Timber and Mine Workers (SINTICIM)	<ul style="list-style-type: none"> ➤ Provides guidance and capability building for the Internal Union Committee; ➤ Conduit between Company and Mozambique Union Movement with the ability to facilitate and or hinder Mining Operations, including negative / positive media coverage; ➤ Ability to educate Company on key trends / developments in labour law and can provide feedback to Company on workforce morale; ➤ Ability to realign disconnect between Internal Union Committee and Company if and when required. ➤ Direct communications with Provincial / Central Labour Authorities with the ability to convey positive / negative feedback accordingly. 	<ul style="list-style-type: none"> ➤ Maintain productive relationship with SINTICIM in support of Balama operations. ➤ Remain abreast of key Industrial Relations developments in Mozambique ➤ Support Twigg to resolve workforce IR disputes. ➤ Maintain proactive position in demonstrating Twigg as an employer of choice - Values driven, competitive conditions, compliant with labour law. 	<ul style="list-style-type: none"> ➤ Bi-annual face to face meetings with documented agenda and meeting minutes; ➤ Ad-hoc meetings as required following key organisational and or workforce developments / changes. 	People & Engagement Manager HRT Supt(s)	GM Operations
Local Development Committee	<ul style="list-style-type: none"> ➤ Ability to support the establishment of a local labour pool comprising of candidates from the Host Communities to ensure the Company has a steady supply of local labour as required; ➤ Helps to ensure local labour is drawn equally from each of the 8 Host Communities; ➤ Provide feedback to Company on local labour issues, opportunities to improve local labour recruitment processes and community sentiment with respect to the Company and its operations. ➤ Ability to positively and or negatively impact the Company's localisation and succession planning initiatives; ➤ Ability to positively or negatively represent Company to District and Provincial Government - e.g. District Administration; ➤ Ability to positively and or negatively impact on social program delivery under the Local Development Agreement 	<ul style="list-style-type: none"> ➤ To ensure a steady stream of local labour is always available to the Operation; ➤ To ensure local employment recruitment practices are conducted fairly and transparently in line with Company Values; ➤ To educate and keep the local community informed with respect to key Company developments and to use this Committee to assist with conveying key messages across the Host Communities - e.g. Imminent plans for the demobilisation of local employees; ➤ Strategic stakeholder in maintaining our "Social License to Operate" 	<ul style="list-style-type: none"> ➤ Quarterly face to face meetings with documented agenda and meeting minutes. ➤ Ad-hoc meetings as required following key organisational and or workforce developments / changes. 	People & Engagement Manager HSSEC Manager Social Supt(s) IR Officer	GM IRCS

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STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Twigg Management Team	<ul style="list-style-type: none"> ➤ Ability to make and execute decisions that can directly impact workforce; ➤ Ability to make and execute decisions that can sit outside of labour law and potentially expose Company to fines / prosecution; ➤ Ability to facilitate or hinder key HR & Training initiatives and associated performance outcomes; ➤ Key customer and target for support for HR & Training Manager; 	<ul style="list-style-type: none"> ➤ To ensure alignment is maintained between HR & Training Strategy and motivations / decisions of Twigg's Management team; ➤ Educate Management as to the requirements, limitations and opportunities that exist under the Mozambique Labour Law; ➤ A source of support, capacity building and guidance for HR & Training team, especially HR&T Manager. 	<ul style="list-style-type: none"> ➤ Weekly Managers Meetings; ➤ Monthly Reporting; ➤ Ad-hoc as required; ➤ Ongoing and daily engagement. 	People & Engagement Manager HRT Supt(s)	GM Operations
National Institute of Employment & Professional Training and Labour Studies (IFPELAC)	<ul style="list-style-type: none"> ➤ Critical for the operation of the Balama Professional Training Centre; ➤ Accountable for the ratification of a National Training Curriculum and Competency Framework; ➤ Direct communications with Provincial / Central Labour Authorities with the ability to convey positive / negative feedback accordingly. ➤ Ability to assist in local capacity building for members of the Host Communities; 	<ul style="list-style-type: none"> ➤ To partner in the management of the Balama Training Centre; ➤ To improve the employability of members of the Host Communities, across industries, to reduce sole the reliance on Twigg for local employment and livelihood generation; ➤ To upskill and build capability in the IFPLAC by partnering with them to deliver a nationally certified training curriculum at Balama. 	<ul style="list-style-type: none"> ➤ Quarterly face to face meetings with documented agenda and meeting minutes. ➤ Monthly Reporting ➤ Ad-hoc meetings as required. 	HSSECC Manager People & Engagement Manager BPTC Supt Social Supt(s)	GM Operations
Twigg Workforce	<ul style="list-style-type: none"> ➤ Ability to directly impact the productivity of Balama Graphite operation and cause material disruption to operations and revenue generation; ➤ Ability to facilitate and adopt key organisational changes as required; ➤ Ability to act as agents for an emerging organisational culture founded on the Company values; ➤ Ability to drive innovation, cost control and productivity improvements. 	<ul style="list-style-type: none"> ➤ To maintain a direct relationship between the Twigg workforce and Management, one that is not over reliant on the internal union committee. ➤ To establish a high performing engaged workforce that is stable over time; ➤ To meet both operational and strategic objectives of the business with little/no resistance or sabotage. ➤ To support Management in achieving Twigg's objectives / strategies. 	<ul style="list-style-type: none"> ➤ Internal Communications Strategy: ➤ Daily Television; ➤ Monthly Newsletter; ➤ Quarterly Newspaper; ➤ Annual Twigg Magazine; ➤ Weekly Toolbox Discussions; ➤ Quarterly State of the Nations; ➤ Daily one-on-ones with Supervisors; ➤ Employee suggestions box; ➤ Reward & Recognition – monthly. 	Twigg Management Team HR & Training Superintendent(s) GM BGO GM IRCS	COO
Recruitment Contractors	<ul style="list-style-type: none"> ➤ Ability to support bulk / specialist recruitment campaigns; ➤ Ability to use as a tool to minimise employee relations risk - outsourcing; ➤ Facilitate workforce planning initiatives; ➤ Ability to leverage off vast employee networks and candidate pools. 	<ul style="list-style-type: none"> ➤ To utilise as a support recourse for external labour and outsourcing when internal capacity is exhausted. ➤ Ensure external recruitment assistance always remains readily available under competitive commercial terms. 	<ul style="list-style-type: none"> ➤ Annual site visits; ➤ Quarterly catch-up; ➤ Ad-hoc as required. ➤ Terms and conditions renewed annually in writing. 	People & Engagement Manager HRT Supt(s)	GM Operations

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STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Specialised Training Provider(s)	<ul style="list-style-type: none"> ➤ Ability to help ensure workforce is trained and competent to conduct high-risk activities at the Balama Graphite operation; ➤ Ability to support safe operations and maintain strong health and safety performance; ➤ Alleviate pressure on internal training team and draw on existing curriculum in support of the broader training requirements of the Balama Graphite operation. 	<ul style="list-style-type: none"> ➤ To ensure our people are trained and competent to undertake high risk activities at the Balama Graphite operation; ➤ To utilise for broader training as required. 	<ul style="list-style-type: none"> ➤ Annual training plan meetings; ➤ Ad-hoc meetings as required; 	People & Engagement Manager HSSEC Manager HRT Supt(s)	GM Operations
Ministry of Labour & Social Security (MITSS)	<ul style="list-style-type: none"> ➤ Ability to introduce new labour legislation that may impact operations at the Balama Graphite operation; ➤ Ability to conduct audits and inspections of the Operation and impose punitive outcomes (fines and suspension) for serious non-compliances; ➤ Ability to suspend operations due to repeated and on-going non-compliance; ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ Maintain productive relationship with MITESS in support of Balama operations. ➤ Remain up to date of key labour developments in Mozambique ➤ Ensure an open and transparent approach with regards to compliance with labour law requirements ➤ Support Twigg to resolve workforce IR disputes. ➤ Maintain proactive position in demonstrating Twigg as an employer of choice - Values driven, competitive conditions of employment. 	<ul style="list-style-type: none"> ➤ Bi-annual face to face meetings with documented agenda and meeting minutes. ➤ Bi-annual site visits ➤ Ad hoc meetings as required. 	People & Engagement Manager GM IRCS HRT Supt(s)	COO Human Resources Manager
Health Insurance Broker and Service Provider	<ul style="list-style-type: none"> ➤ Ability to help ensure workforce and respective families are covered in terms of medical in-patient and out-patient requirements; ➤ Ability to use as a tool to increase attraction and retention capabilities; ➤ Ability to support site medical provider with injury management and medical emergency evacuations; ➤ Can reduce medical insurance costs by establishing competitive tension between service providers. 	<ul style="list-style-type: none"> ➤ Ensure external health assistance always remains readily available under competitive commercial terms. ➤ Ensure workforce remains abreast of health insurance benefit balances through regular comprehensive statements. ➤ Ensure service provision standards are aligned with Company expectations and agreed commercial terms. 	<ul style="list-style-type: none"> ➤ Bi-Annual site visits; ➤ Quarterly catch-up; ➤ Ad hoc as required; ➤ Terms and conditions renewed annually in writing. 	People & Engagement Manager HRT Supt(s)	GM IRCS
Employee Assistance Programme (ICAS)	<ul style="list-style-type: none"> ➤ Ability to help ensure workforce and immediate families have free confidential support through professional counselling services; ➤ Ability to educate, generate awareness, provide counselling and testing services to workforce and immediate families, thus contributing to the improved health & well-being of the workforce; ➤ Can provide trauma response support to workforce following a critical incident. 	<ul style="list-style-type: none"> ➤ To maintain a sound state of mental, emotional, social and spiritual well-being amongst Twigg's workforce in line with Company Values; ➤ To provide professional counselling through building a relationship of trust and confidence between ICAS and Twigg workforce; ➤ To ensure the workforce has professional counselling support available at all times. 	<ul style="list-style-type: none"> ➤ Quarterly site visits; ➤ Quarterly catch-up; ➤ Ad hoc as required; ➤ Terms and conditions renewed annually in writing. 	People & Engagement Manager HRT Supt(s)	GM Operations

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Workman's Compensation Insurance provider	<ul style="list-style-type: none"> ➤ Alleviate pressure on self-insurance for treatment of work-related accidents or illnesses; ➤ Ability to ensure all employees are covered and appropriate assistance is provided in the treatment of work-related accidents and/or illnesses; ➤ Can submit claims to the Mozambique Health Board on behalf of the Company for resolution; ➤ Helps to ensure Company compliance with Labour Law and other regulatory requirements. 	<ul style="list-style-type: none"> ➤ Remain up to date of key labour legislation requirements for work-related accidents and/or illnesses; ➤ Support Twigg leadership with the required management of work-related accidents and/or illnesses; ➤ Ensure injured / ill employees receive what they are entitled to under Mozambique law. 	<ul style="list-style-type: none"> ➤ Annual site visits; ➤ Quarterly catch-up; ➤ Ad hoc as required; ➤ Terms and conditions renewed annually in writing. 	People & Engagement Manager HSSEC Manager HRT Supt(s) HSSE Supt(s)	GM IRCS

b. MALARIA

STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Ministry of Health & National Directorate of Public Health	<ul style="list-style-type: none"> ➤ Custodians of the Health Sector Strategic Plan 2014 – 2019 with the ability to determine / influence Mozambique's global Health strategies including HIV/AIDS, malaria, cholera etc; ➤ Custodians of the National Malaria Control Program & Malaria Strategic Plan 2017 – 2022; ➤ Determines Mozambique's level of commitment and investment of resources to fight malaria; ➤ Ability to solicit multi-sector international support / expertise and resources to eradicate malaria; ➤ Ability to determine the responsibilities of the private sector in eradicating malaria; ➤ Ability to positively / negatively influence the level of resources invested in Cabo Delgado to fight malaria; ➤ Responsible for Rapid Detection Test (RDT), bed net and medication distribution across Mozambique; ➤ Custodians of Community Health Worker (APE) Program and allocation of associated resources; ➤ Custodians of the goals, objectives and indicators to monitor and evaluate the effectiveness of the National Malaria Control Program and to inform all key partners / stakeholders. 	<ul style="list-style-type: none"> ➤ To understand the National Malaria Strategy and to ensure alignment with key initiatives; ➤ To raise the profile of Twigg as a key partner in the fight against malaria and to raise awareness as to the key initiatives and partnerships that are taking place at Balama in support of the national strategy. 	<ul style="list-style-type: none"> ➤ Annual and or Ad-hoc meetings as required; ➤ Annual reporting to Government; ➤ Annual site visits to Balama. 	GM IRCS	COO
National Director of the National Malaria Control Program (NMCP)	<ul style="list-style-type: none"> ➤ Accountable for the implementation and monitoring of the NMCP 2017 – 2022; ➤ Accountable for all resource allocation associated with the NMCP 2017 – 2022; ➤ Accountable for NMCP progress reporting to the Council of Ministers and the Mozambique President; ➤ Ability to authorise the dissemination of key malaria information / resources to the Company; ➤ Ability to address key challenges associated with the NMCP at a District and Provincial level; ➤ Conduit between Private and Non-Government Organisations to ensure the free flow of information; ➤ Ability to support Company efforts to establish relationships with key malaria stakeholders at all levels; ➤ Major recipient of all international funding associated with malaria eradication efforts. 	<ul style="list-style-type: none"> ➤ Raise awareness of key malaria challenges at a District and Provincial level and gain support for addressing these constraints; ➤ Obtain nationally endorsed malaria training material / curriculum; ➤ To understand the progress / effectiveness of the National Malaria Control Program; ➤ To identify potential key partnerships / funding that could assist in reducing malaria at Balama; ➤ To raise the profile of Twigg as a key partner in the fight against malaria and to raise awareness as to the key initiatives and partnerships that are taking place at Balama in support of the national strategy; ➤ To obtain endorsement for Twigg to access national training material and key stakeholders. 	<ul style="list-style-type: none"> ➤ Annual /biannual and or Ad-hoc meetings as required; ➤ Annual reporting to Government; ➤ Annual site visits to Balama. 	HSSEC Manager GM IRCS	COO

STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Malaria Consortium	<ul style="list-style-type: none"> ➤ Major funding recipients from the United Kingdom and UNICEF; ➤ Assist with the supply and distribution of Long-Life Insecticidal Nets (LLIN's) across Mozambique; ➤ Custodians of the Upscale Program responsible for the digitisation of national malaria information collected via android mobile devices at a Community and District level; ➤ Provide behaviour change training and education programs to Community Health Workers (APE's), schoolteachers and children for disease prevention. 	<ul style="list-style-type: none"> ➤ To understand the type and frequency of local training efforts undertaken at Balama so as to inform Twigg efforts to deliver / support community and Company based training; ➤ To support the generation of good health data at a community and district level. 	<ul style="list-style-type: none"> ➤ Annual and or Ad-hoc meetings as required 	GM IRCS HSSEC Manager	COO
World Vision & The Foundation for Community Development	<ul style="list-style-type: none"> ➤ The Principal Recipient of Global Fund and have contracted the Foundation for Community Development to assist in bed net distribution and Community & School Education nationwide; ➤ Provide training to the Health Committees and Community Health Workers (APE's); ➤ Provide training to School Teachers which forms part of their role requirements as teachers; ➤ Conduct operational research to improve health care efficiency and coverage to inform national policy. 	<ul style="list-style-type: none"> ➤ Understand and contribute to the local training / upskilling efforts undertaken by the Foundation for Community Development; ➤ Obtain culturally appropriate training materials for dissemination across the Company / Community; ➤ Obtain research data to inform best practice initiatives at the Company / Community levels. 	<ul style="list-style-type: none"> ➤ Annual and or Ad-hoc meetings as required 	GM IRCS HSSEC Manager	COO
United States President's Malaria Initiative	<ul style="list-style-type: none"> ➤ Strongest resource for technical assistance / guidance to Central and Provincial Government and the Private Sector in relation to the management of the NMCP and associated strategies, including: <ul style="list-style-type: none"> ○ Indoor Residual Spraying with efforts focussed on Zambézia and Nampula; ○ Oversight of entomological collection framework & mosquito resistance to insecticides; ○ Bed net distribution campaigns; ➤ Primary source of free malaria medications across Mozambique alongside the Global Fund; ➤ Implementation and management of the Medicines and Medical Equipment Information System (SIMAM), a Pharmaceutical monitoring and procurement system; ➤ Custodians of the National Malaria Indicator Survey to be released in late 2018; ➤ Provide funding for the APE's and associated consumables. 	<ul style="list-style-type: none"> ➤ Obtain the National Malaria Indicator Survey 2018 to inform malaria eradication efforts at Balama; ➤ Provide district level feedback as to the supply of malaria medications to the District and Community; ➤ Collaborate to ensure adequate funding is directed to the appointment of APE's in Balama and feedback as to APE numbers and challenges. ➤ 	<ul style="list-style-type: none"> ➤ Annual and or Ad-hoc meetings as required 	GM IRCS HSSEC Manager	COO


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Provincial Directorate of Health & Provincial Director for Malaria;	<ul style="list-style-type: none"> ➤ Implement the NMCP across Cabo Delgado and report program effectiveness to Central Government; ➤ Responsible for district supply of malaria medicines, RDT's and training and education programs; ➤ Responsible for District level entomological studies into insecticide resistance via Pemba insectary; ➤ Responsible for resourcing District and Community Health facilities with health professionals. 	<ul style="list-style-type: none"> ➤ Keep informed as to malaria eradication efforts / initiatives at the Company, District and Community; ➤ Discuss key challenges experienced at the District / Community level and understand how these will be addressed and the potential role Twigg can play to assist; ➤ Raise the profile of Twigg that we are aligned with NMCP and are partnering with stakeholders to fight malaria. ➤ Keep abreast of NMCP progress reports, and results from insecticide resistance studies. 	<ul style="list-style-type: none"> ➤ Annual /biannual and or Ad-hoc meetings as required; ➤ Quarterly / annual reporting to Government; ➤ Annual site visits to Balama. 	GM IR &CS HSSEC Manager	COO / CPO
Balama District Hospital & District Health Committee	<ul style="list-style-type: none"> ➤ Ability to reduce malaria prevalence in the District via quality case management, early detection, and treatment; ➤ Provide malaria medication and RDT's to Community Health Facilities; ➤ Provide training and education to District and Community Health workers; ➤ Conduit to Provincial Health authorities in relation to Company health concerns; ➤ Ability to inform the Company of key health challenges / constraints and malaria prevalence; 	<ul style="list-style-type: none"> ➤ To understand the incidence / prevalence of malaria across the District / Community; ➤ To collaborate in the training and education of the local community, school children and health workers; ➤ To establish a Health Committee that meets monthly consisting of Government, NGO and Private Industry to review health programs, resources and their effectiveness at a District / Community level. ➤ To understand the challenges and constraints experienced by the local health authorities. 	<ul style="list-style-type: none"> ➤ Ad-hoc meetings as required ➤ Monthly Health Committee meetings; ➤ Annual reporting. 	HSSEC Manager	GM IR &CS
Community Health Centres & Community Health Supervisors.	<ul style="list-style-type: none"> ➤ Provide behaviour change education and training to members of the local community; ➤ Oversee the daily activities of Community Health Workers (APE'S); ➤ Storage and distribution of RDT's and malaria medicine for the local community; ➤ Collect malaria prevalence data and feed into the Upscale System for Provincial / Central monitoring. 	<ul style="list-style-type: none"> ➤ To contributes to the upskilling of local health workers (APE's) and their Supervisors; ➤ To understand the challenges and constraints experienced at the Community-level and to support where possible; ➤ To establish mosquito monitoring program and to support the collection of sound malaria data. 	<ul style="list-style-type: none"> ➤ Ad-hoc meetings as required; ➤ Weekly / Monthly meetings and or visits; ➤ Bi-annual training. 	HSSEC Manager	GM Ops

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Community Health Workers (APE's)	<ul style="list-style-type: none"> ➤ Provide RDT's, treatment & behaviour change education directly to members of the local community; ➤ Provide malaria prevalence / infection monitoring data to District and Provincial authorities via Upscale. 	<ul style="list-style-type: none"> ➤ To support training and upskilling efforts of APE's aligned with the NMCP & associated developments; ➤ To support the supply of RDT's and medicines to local health workers; ➤ To support the collection of malaria monitoring data and the use of the Upscale platform. 	<ul style="list-style-type: none"> ➤ Ad-hoc meetings as required; ➤ Weekly / Monthly meetings and or visits; ➤ Bi-annual training 	HSSEC Manager	GM Ops
Goodbye Malaria Foundation	<ul style="list-style-type: none"> ➤ Resource for technical assistance / guidance to Central and Provincial Government and the Private Sector in relation to the management of the NMCP and associated strategies, including: <ul style="list-style-type: none"> ○ Indoor Residual Spraying with efforts focussed on Zambézia and Nampula; ○ Oversight of entomological collection framework & mosquito resistance to insecticides; ○ Bed net distribution campaigns. ➤ Direct link to the Ministry of Health & National Directorate of Public Health for obtaining authorisation and provision of chemicals for an Indoor Residual Spraying campaign within the local host communities. 	<ul style="list-style-type: none"> ➤ To understand the National Malaria Strategy and to ensure alignment with key initiatives; ➤ Obtain updates on latest strategies in the elimination of malaria; ➤ To raise the profile of Twigg as a key partner in the fight against malaria and to raise awareness as to the key initiatives and partnerships that are taking place at Balama in support of the national strategy. 	<ul style="list-style-type: none"> ➤ Ad-hoc meetings as required. 	HSSEC Manager	GM Ops
Local Development Committee	<ul style="list-style-type: none"> ➤ Critical for maintaining the Company's "Social License to Operate" with the ability to suspend operations following a critical incident involving the community. ➤ Agents for disseminating a strong health, safety and security message across the local community and to keep members informed of key mining activities - e.g. road safety, blast safety, community security; ➤ Ability to apprehend offenders or to notify Twigg of theft events and return (anonymously) stolen goods / materials; ➤ Ability to inform / educate Twigg as to the major health concerns and needs of the local communities; ➤ Direct dialogue with local government with the ability to positively / negatively feedback about Company activities and engagement. 	<ul style="list-style-type: none"> ➤ To minimise the impact (injury / illness) of Balama mining operations on the local community; ➤ To build capability of the local community through education programs as to the importance of mine safety, community security and community health; ➤ To inform community health programs and more broadly the Twigg Social agenda; ➤ To minimise theft; ➤ To ensure the local community remains informed as to key mining activities/ developments and has an opportunity to present their concerns. 	<ul style="list-style-type: none"> ➤ Quarterly Community Health, Safety & Security Committee Meetings with documented agenda and meeting minutes taken. ➤ Quarterly site visits from Community Leaders. Ad-hoc meetings as required following significant (potential) incidents and or key changes to the mining activities and or plans. 	HSE Supt; Social Supt; ISOS rep.	HSSEC Manager;

c. HEALTH, SAFETY & SECURITY – STAKEHOLDER ENGAGEMENT PLAN


STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Twigg Health and Safety Committee	<ul style="list-style-type: none"> ➤ Agents of change for key health, safety and security initiatives / developments. ➤ Conduit between Management and workforce and agents for educating wider workforce on key health, safety and security initiatives, programs, systems and standards of work. ➤ Represent the concerns, aspirations and ideas of the workforce with respect to health, safety and security. 	<ul style="list-style-type: none"> ➤ To generate ground-up support for health, safety, and security at work; ➤ To drive continual improvement of the HSS performance of the Balama Graphite Operation; ➤ To drive a Good Health and Work Safely at all Times Culture reflected by strong performance metrics and engaged workforce; ➤ To minimise theft; ➤ To build the capability of the workforce with respect to health, safety and security at work; ➤ To ensure compliance with legislative requirements. 	<ul style="list-style-type: none"> ➤ Monthly H&S Comm Meetings with documented agenda and meeting minutes taken. ➤ Ad-hoc meetings as required following significant (potential) incidents and or key changes to the health, safety and security function / practices. 	HSE Supt; Management Team; ISOS rep. Appointed HS Reps (workforce)	HSSEC Manager;
Local Development Committee	<ul style="list-style-type: none"> ➤ Critical for maintaining the Company's "Social License to Operate" with the ability to suspend operations following a critical incident involving the community. ➤ Agents for disseminating a strong health, safety and security message across the local community and to keep members informed of key mining activities - e.g. road safety, blast safety, community security; ➤ Ability to apprehend offenders or to notify Twigg of theft events and return (anonymously) stolen goods / materials; ➤ Ability to inform / educate Twigg as to the major health concerns and needs of the local communities; ➤ Direct dialogue with local government with the ability to positively / negatively feedback about Company activities and engagement. 	<ul style="list-style-type: none"> ➤ To minimise the impact (injury / illness) of Balama mining operations on the local community; ➤ To build capability of the local community through education programs as to the importance of mine safety, community security and community health; ➤ To inform community health programs and more broadly the Twigg Social agenda; ➤ To minimise theft; ➤ To ensure the local community remains informed as to key mining activities/ developments and has an opportunity to present their concerns. 	<ul style="list-style-type: none"> ➤ Quarterly Meetings. ➤ Quarterly site visits from Community Leaders. ➤ Ad-hoc meetings as required following significant (potential) incidents and or key changes to the mining activities and or plans. 	HSE Supt; Social Supt; ISOS rep.	HSSEC Manager;
Provincial Directorate of Mineral Resources & Energy and General Inspection of	<ul style="list-style-type: none"> ➤ Ability to introduce new Health and Safety legislation that may help or hinder operations at the Balama Graphite Operation; ➤ Ability to conduct audits and inspections of the Project and impose punitive outcomes (fines and suspension) for serious non-compliances; ➤ The National and Provincial arms of the Mozambique Government with the ability to suspend operations due to 	<ul style="list-style-type: none"> ➤ To ensure the Provincial Government remains informed as to Company health, safety and security performance and continual improvements. ➤ To ensure the company remains compliant with legislation; 	<ul style="list-style-type: none"> ➤ Quarterly face-to-face meetings. ➤ Monthly, quarterly, semi-annual and annual reporting 	HSE Supt; Social Supt; SRHC Manager	HSSEC Manager;

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Mineral Resources and Energy (INGREME)	<p>repeated and on-going non-compliance / poor health and safety performance;</p> <ul style="list-style-type: none"> ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ To ensure the Company remains informed of changes in legislation and or the key priorities of the Directorate with respect to health, safety and security. 			
Contracted Medical Provider	<ul style="list-style-type: none"> ➤ Ability to execute the sites primary, occupational and emergency health services and facilities in line with key commercial terms / site requirements; ➤ Ability to provide primary and emergency stabilisation health services to expatriate employees in Pemba; ➤ Ability to provide medical emergency evacuation support to seriously injured / ill personnel. ➤ Critical resource in the delivery of workforce / community health initiatives and education awareness programs; ➤ Key mitigation in the fight against malaria at Balama. 	<ul style="list-style-type: none"> ➤ To ensure alignment between Medical Provider activities and key commercial terms of the contract / site requirements; ➤ To ensure a healthy and engaged workforce; ➤ To drive community health programs across the Host Communities; ➤ Continual improvement in the provision of health services and support at Twigg; ➤ To maintain and meet the Company's duty of care obligations to its people. 	<ul style="list-style-type: none"> ➤ Daily / weekly contractor interactions and meetings; ➤ Annual contract renewals; ➤ Quarterly site visits by Corporate representatives; ➤ Annual license renewal of site health clinics; ➤ Monthly Health & Safety Committee meetings. 	HSE Supt; Social Supt; Management Team;	HSSEC Manager
Twigg Management Team	<ul style="list-style-type: none"> ➤ Ability to implement decisions and work instructions that could have a material impact on the health, safety and security of the workforce; ➤ Agents for disseminating and enforcing key health, safety and security initiatives and developments; ➤ Ability to facilitate or hinder key Health, Safety and Security performance at the Balama Graphite operation; ➤ Key customer and target for support for Health, Safety and Security Manager; 	<ul style="list-style-type: none"> ➤ To ensure alignment is maintained between Health, Safety and Security Strategy and motivations / decisions of Balama Management team; ➤ Educate Management as to the requirements, limitations and opportunities that exist under the Mozambique regulations; ➤ A source of support, capacity building and guidance for Health, Safety & Security Team. 	<ul style="list-style-type: none"> ➤ Daily face to face meetings and one-on-ones; ➤ Monthly Managers Meetings; ➤ Weekly Toolbox Sessions; ➤ Monthly Reporting; ➤ Ad-hoc as required following key developments; ➤ Ongoing and daily engagement. ➤ Annual Project Risk Register Reviews. 	HSE Supt;	HSSEC Manager
Twigg Workforce	<ul style="list-style-type: none"> ➤ Ability to directly impact the productivity of Balama Graphite Operation and cause material disruption to operations and revenue generation though poor health, safety and security performance / compliance; ➤ Ability to facilitate and adopt key health, safety and security organisational changes as required; ➤ Ability to act as agents for an emerging organisational culture founded on the Company values; ➤ Ability to drive innovation, cost control and productivity improvements. ➤ Provide a bottom-up consultative process for employee input into health, safety and security improvement suggestions. 	<ul style="list-style-type: none"> ➤ To establish a direct relationship between the Twigg workforce and Management, one that is not over reliant on the internal union committee. ➤ To establish a high performing engaged workforce that is stable over time; ➤ To meet both operational and strategic objectives of the business with little/no resistance or sabotage. 	<ul style="list-style-type: none"> ➤ Internal Comms Strategy: ➤ Twigg TV - daily; ➤ Twigg Newsletter - monthly; ➤ Toolbox Discussions - weekly; ➤ State of the Nations - quarterly; ➤ Daily one-on-ones with supv; ➤ Employee suggestions box; ➤ Reward & Recognition – monthly ➤ In Field Leadership Interactions 	HSSEC Manager HSE Supt(s) Management Team	GM Balama Ops
Contracted Security Provider(s)	<ul style="list-style-type: none"> ➤ Ability to promote and maintain security at the Project; 		<ul style="list-style-type: none"> ➤ Daily / weekly contractor interactions and meetings; 	HSE Supt;	HSSEC Manager

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	<ul style="list-style-type: none"> ➤ Ability to respond to heightened risk environments if and when required; ➤ Ability to provide specialist services not readily available within Twigg workforce; ➤ Ability to share key security intelligence / information 	<ul style="list-style-type: none"> ➤ To ensure alignment between Contractor Security activities and key commercial; ➤ To protect Company assets and people; ➤ Continual improvement in the provision of security services and support at Twigg; ➤ To maintain and meet the Company's duty of care obligations to its people. 	<ul style="list-style-type: none"> ➤ Contract renewals; ➤ Quarterly contract performance meetings face-to-face on site; ➤ Ad-hoc meetings as required. 		
District & Provincial Police Command	<ul style="list-style-type: none"> ➤ Ability to promote and maintain security at the Operation and in the Balama District; ➤ Ability to respond to heightened risk environments if and when required; ➤ Ability to provide specialist services not readily available within Twigg workforce; 	<ul style="list-style-type: none"> ➤ To obtain District / Provincial intelligence regarding unrest and or acts of violence; ➤ To ensure alignment between Police security activities and site security requirements; ➤ To protect Company assets and people; ➤ To maintain law and order in the District; ➤ Continual improvement in the provision of security services and support at Twigg; ➤ To maintain and meet the Company's duty of care obligations to its people. ➤ To reaffirm Company's support for maintaining law and order in Mozambique. 	<ul style="list-style-type: none"> ➤ Quarterly contract performance meetings face-to-face on site. ➤ Ad-hoc meetings as required following significant (potential) incidents and or key changes to the security environment and or priorities of the operation. 	HSSEC Manager Social Supt	GM Balama Ops
The National Service of Public Safety (SENSAP)	<ul style="list-style-type: none"> ➤ Ability to determine compliance with Emergency Services; ➤ Ability to conduct audits and inspections of the Operation and impose punitive outcomes (fines and suspension) for serious non-compliances; ➤ Emergency Services regulator with the ability to provide positive/negative feedback depending on Company Emergency Preparedness structure and ERT Skills Set; 	<ul style="list-style-type: none"> ➤ To ensure the Provincial Government remains informed as to Company Emergence Preparedness structure, performance and continual improvement. ➤ To ensure the company remains compliant with legislation; ➤ To ensure the provincial and districts emergence services unities remains informed as to ➤ company Emergence Preparedness structure, performance and ready to assist where possible when engaged. 	<ul style="list-style-type: none"> ➤ Quarterly face-to-face meetings; ➤ Bi-annual and annual inspections reporting; ➤ Annual Twigg-SENSAP Emergency Response drills. ➤ Ad-hoc meetings as required. 	HSSEC Manager HSE Supt	GM Balama Ops
National Atomic Energy Agency (ANEA)	<ul style="list-style-type: none"> ➤ Ability to introduce new legislation that may help or hinder operations at the Balama Graphite Operation; 	<ul style="list-style-type: none"> ➤ To ensure the Government remains informed as to Company radioactive 	<ul style="list-style-type: none"> ➤ Quarterly face-to-face meetings / site visits. 	HSSEC Manager HSE Supt.	GM Balama Ops

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	<ul style="list-style-type: none"> ➤ Ability to conduct audits and inspections of the Project and impose punitive outcomes (fines and suspension) for serious non-compliances; ➤ Ability to suspend operations due to repeated and on-going non-compliance / poor health and safety performance; 	<p>nuclides management and radiation protection performance.</p> <ul style="list-style-type: none"> ➤ To obtain the Radiation License; ➤ To ensure the company remains compliant with legislation; ➤ To ensure the Company remains informed of changes in legislation. ➤ To maintain compliance with Radiation Management Plan and Monitoring Program license conditions; 			
Ministry of Labour, Employment & Social Security (MITESS) and The General Labour Inspectorate (IGT)	<ul style="list-style-type: none"> ➤ Ability to introduce new labour legislation that may impact operations at the Balama Graphite operation; ➤ Ability to conduct audits and inspections of the Project and impose punitive outcomes (fines and suspension) for serious non-compliances; ➤ Ability to suspend operations due to repeated and on-going non-compliance; ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ Maintain productive relationship with the General Labour Inspectorate (IGT); ➤ Remain up to date of key labour Health and Safety developments in Mozambique. ➤ Ensure compliance with Health and Safety Law requirements. ➤ Support Twigg Health and Safety Site Committee performance. ➤ Demonstrate Twigg as an employer of choice - Values driven, health and Safe working environment and duty of care. 	<ul style="list-style-type: none"> ➤ Quarterly face to face meetings; ➤ Quarterly site visits; ➤ National and Provincial health and Safety Conference ➤ Ad hoc meetings as required. 	HSSEC Manager HSE Supt.	GM Balama Ops

d. SOCIAL – STAKEHOLDER ENGAGEMENT PLAN


STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Local Development Committee	<ul style="list-style-type: none"> ➤ Ability to inform / guide the local development agenda in the district; ➤ Ability to represent the needs of the Community /Government with respect to social program delivery; ➤ Ability to make material changes in scope / cost of Twigg's Local Development commitments; ➤ Direct interface with local and Provincial Government and can represent the Company positively / negatively as a result of interactions / activities; ➤ Can support / hinder the Company's License to Operate. 	<ul style="list-style-type: none"> ➤ Provide the local Community with a voice in relation to social program delivery; ➤ To ensure social program delivery is aligned to the needs of the Host Communities & local Govt; ➤ To meet the commitments / obligations stipulated in the Local Development Agreement. 	<ul style="list-style-type: none"> ➤ Quarterly Committee Meetings ➤ Ad-hoc meetings as required 	HSSEC Manager Social Supt; GM Balama Ops. IR Officer	GM IRCS
Resettlement Committee	<ul style="list-style-type: none"> ➤ Ability to inform / guide the local resettlement agenda in the district; ➤ Oversee RAP efforts to ensure compliance with Mozambique regulations and leading practice ➤ Ability to represent the needs of the Community and Provincial Government with respect to resettlement and livelihood restoration in Balama; ➤ Ability to represent the interests of the Company across the Host Communities; ➤ Conduit between Company & Projected Affected Farmers for complaint resolution; ➤ Ability to make material changes in scope / cost of Twigg's Resettlement Action Plan (RAP); ➤ Direct interface with local and Provincial Government and can represent the Company positively / negatively as a result of interactions / activities; ➤ Can support / hinder the Company's License to Operate. 	<ul style="list-style-type: none"> ➤ Ensure a robust, auditable, fair and transparent process is undertaken with respect to the resettlement of farms on the mine concession - in line with IFC Guidelines on resettlement; ➤ To maintain strong relationships with the Host Communities founded on trust; ➤ Ensure an agreed and well communicated plan is established and executed in relation to mapping of farms, compensating affected farmers, providing alternative land and seeds etc. ➤ Ensure clear, consistent and regular communications are delivered to project Affected Farmers; ➤ To request support in dealing with RAP related complaint / issue; 	<ul style="list-style-type: none"> ➤ Quarterly Committee Meetings ➤ Ad-hoc meetings as required 	HSSEC Manager Social Supt;	GM Balama Ops. GM IRCS
Chief of Host Communities and Technical Working Groups (TWG's)	<ul style="list-style-type: none"> ➤ Primary conduit between the Company and Host Communities; ➤ Ability to represent the needs of the local community and inform / guide local development planning and implementation; ➤ Ability to facilitate or hinder Twigg activities and social program delivery depending on their level of support for the Project; ➤ Critical in maintaining Company's License to Operate; ➤ Critical agents in the dissemination of community-based education and awareness raising sessions driven by the Company; 	<ul style="list-style-type: none"> ➤ Maintain productive relationships with Host Communities based on trust and mutual benefit; ➤ Ensure alignment between social program delivery, the needs of the community and the strategic direction of the business; ➤ To protect the Company's License to Operate; ➤ To advise of the status and outcomes of local development planning and implementation. 	<ul style="list-style-type: none"> ➤ Weekly / Monthly meetings as required. ➤ Quarterly meetings; ➤ Regular site visits; ➤ Ad-hoc meetings as required. 	HSSEC Manager Social Supt; Social Supt; IR officer	GM Balama Ops. GM IRCS

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	<ul style="list-style-type: none"> ➤ Critical agents for community-based security. ➤ Critical for determining performance of the Social function and the success of key outcomes. 				
Social Monitoring Contractors (E.g. GABE Consulting)	<ul style="list-style-type: none"> ➤ Ability to determine compliance with Social-Economic & Health license conditions; ➤ Direct line of sight to regulators with the ability to provide positive/negative feedback depending on Company performance; ➤ Ability to provide specialist certified expertise not readily available within the Company. ➤ Ability to positively and or negatively impact on social program delivery under the Local Development Agreement 	<ul style="list-style-type: none"> ➤ To maintain compliance with Socio-Economic Health License Conditions; ➤ To provide external validation of Company's Sustainability efforts; ➤ To protect license to operate; ➤ To commission specialist consultant studies in line with license / operating philosophy requirements. 	<ul style="list-style-type: none"> ➤ Annual and or as required according to license requirements. Engagements governed by formal commercial terms / service agreements 	HSSEC Manager	GM IRCS
Ministry of Land, Environment & Rural Development (MITADER)	<ul style="list-style-type: none"> ➤ Ability to introduce new legislation that may help or hinder operations at the Balama Graphite operation; ➤ Ability to conduct audits and inspections of the Project and impose punitive outcomes (fines and suspension) for serious non-compliances; ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance; 	<ul style="list-style-type: none"> ➤ To ensure the Provincial Government remains informed as to Company performance and continual improvements. ➤ To ensure the company remains compliant with legislation; ➤ To ensure the Company remains informed of changes in legislation and or the key priorities of the Directorate with respect to Social performance. 	<ul style="list-style-type: none"> ➤ Quarterly face-to-face meetings and site visit with Provincial Director of MITADER with a documented agenda and meeting minutes. Monthly, quarterly, semi-annual, and annual reporting regarding Company Social & Environment performance. 	Senior Env Specialist;	HSSEC Manager
District Government	<ul style="list-style-type: none"> ➤ Ability to introduce new labour legislation that may impact operations at the Balama Graphite operation; ➤ Ability to regulate or influence the Balama Graphite operation in terms of establishing policy, granting permits or other approvals for the Operation, and monitoring and enforcing compliance with Mozambican Law throughout the mine lifecycle; ➤ Ability to suspend operations due to repeated and on-going non-compliance; ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ To ensure the District Government remains informed as to Company Social performance. ➤ Maintain productive relationship with DA in support of Balama operations, ensure an open and transparent approach with regards to compliance with law requirements and implementation of key local developments programs in the district; ➤ Support Twigg to resolve stakeholder's complaints and disputes. 	<ul style="list-style-type: none"> ➤ Monthly face to face meetings with documented agenda and meeting minutes. Ad hoc meetings as required following key organisational and or local development program/ changes. 	Soc Supt(s)	HSSEC Manager

e. ENVIRONMENT – STAKEHOLDER ENGAGEMENT PLAN


STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Local Development Committee	<ul style="list-style-type: none"> ➤ Critical for maintaining the Company's "License to Operate" with the ability to suspend operations following a significant (potential) incident involving the community / environment. ➤ Agents for disseminating a strong ecological conservation and management message across the local community and to keep members informed of key mining activities - e.g. water run-off in the wet season and dust, noise at Pirira; ➤ Ability to inform / educate Twigg as to the major environmental concerns of the local communities; ➤ Direct dialogue with local government with the ability to positively / negatively feedback about Company activities and engagement. 	<ul style="list-style-type: none"> ➤ To minimise the environmental impact of Balama mining operations on the local community; ➤ To build capability of the local community through their involvement in environmental monitoring program activities; ➤ To inform community as to measures taken to reduce dust and noise to the communities; ➤ To ensure the local community remains informed as to key mining activities/ developments and has an opportunity to present their concerns. 	<ul style="list-style-type: none"> ➤ Quarterly Community HSSECC Committee Meetings. ➤ Quarterly site visits from Community Leaders. ➤ Ad-hoc meetings as required. 	HSSEC Manager	GM IRCS
Ministry of Land, Environment & Rural Development (MITADER)	<ul style="list-style-type: none"> ➤ Ability to introduce new legislation that may help or hinder operations at the Balama Graphite Operation; ➤ Ability to conduct audits and inspections of the Project and impose punitive outcomes (fines and suspension) for serious non-compliances; ➤ Issuing Authority for the Twigg Environmental Operating License. 	<ul style="list-style-type: none"> ➤ To ensure the company remains compliant with legislation; ➤ To ensure the Company remains informed of changes in legislation and or the key priorities of the Directorate with respect to Environmental performance. ➤ To ensure the company remains compliant with environmental license conditions; ➤ To meet all requirements associated with the renewal of the Environmental Operating License. 	<ul style="list-style-type: none"> ➤ semi-annual and annual reporting. ➤ Annual compliance audit ➤ Annual face-to-face meetings and/or site visits. 	HSSEC Manager	GM IRCS
DPTDER	<ul style="list-style-type: none"> ➤ A Provincial arm of the Mozambique Government with the ability to suspend operations due to repeated and on-going non-compliance and or poor health, safety & environmental performance; ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ To ensure the Provincial Government remains informed as to Company Environmental performance ➤ To ensure the company remains compliant with environmental license conditions 	<ul style="list-style-type: none"> ➤ Quarterly face-to-face meetings and/or site visits ➤ Annual compliance audit ➤ Semi-annual and annual reporting regarding Company 	HSSEC Manager	GM IRCS
DPREME / DPI	<ul style="list-style-type: none"> ➤ A Provincial arm of the Mozambique Government with the ability to suspend operations due to repeated and on-going non-compliance / poor health, safety and environmental performance; 	<ul style="list-style-type: none"> ➤ To ensure the Provincial Government remains informed as to Company Environmental performance and continual improvements; 	<ul style="list-style-type: none"> ➤ Quarterly face-to-face meetings ➤ Annual compliance audit ➤ Quarterly and annual reporting 	HSSEC Manager	GM IRCS

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	<ul style="list-style-type: none"> ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ To ensure the company remains compliant with environmental license conditions ➤ Authorization for dispatch of environmental samples. 	<ul style="list-style-type: none"> ➤ Annual face-to-face meetings and/or site visits. 		
ARA NORTE	<ul style="list-style-type: none"> ➤ A Regional water authority with the ability to suspend water supply to the operations due to repeated and on-going non-compliance / and breach of water extraction license: ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ To ensure / demonstrate the company remains compliant with water license conditions ➤ To ensure the Provincial Government remains informed as to Company Environmental performance 	<ul style="list-style-type: none"> ➤ Semi-annual face-to-face meetings ➤ Quarterly sharing of water quality data 	HSSEC Manager SRHC Manager IR Officer	GM IRCS
Environmental External Auditors	<ul style="list-style-type: none"> ➤ Ability to determine compliance with Environmental, Social-Economic, Health license conditions; ➤ Direct line of sight to regulators with the ability to provide positive/negative feedback depending on Company performance; ➤ Ability to provide external certified expertise as required. 	<ul style="list-style-type: none"> ➤ To maintain compliance with Environmental and Social Management Plan and Monitoring Program license conditions; ➤ To provide external validation of Company's environmental performance; ➤ To protect license to operate; 	<ul style="list-style-type: none"> ➤ Annual and or as required ➤ Engagements governed by formal commercial terms / service agreements 	HSSEC Manager	GM IRCS
Balama Management Team	<ul style="list-style-type: none"> ➤ Ability to make and execute decisions that can directly impact the environment; ➤ Ability to make and execute decisions that can jeopardise Environmental license conditions potentially resulting in prosecution; ➤ Ability to facilitate or hinder key Environment initiatives and associated performance outcomes; ➤ Key customer and target for support for Social & Environment Manager; 	<ul style="list-style-type: none"> ➤ To ensure alignment is maintained between Environmental Strategy and motivations / decisions of Balama Management team; ➤ Educate Management as to the requirements, limitations and opportunities that exist under the Environmental license conditions; ➤ A source of continual improvement, support, capacity building and guidance for Environment team, especially Social & Environment Manager. 	<ul style="list-style-type: none"> ➤ Monthly Managers Meetings; ➤ Weekly Toolbox Sessions; ➤ Monthly Reporting; ➤ Ad-hoc as required; ➤ Ongoing and daily engagement. 	HSSEC Manager	GM IRCS
Specialist Service Providers - External	<ul style="list-style-type: none"> ➤ Ability to provide specialist expertise not readily available in-house to ensure compliance with license conditions and best practice. ➤ Conduit into other key stakeholders with the ability to raise the profile of the Company and solicit support for operations; 	<ul style="list-style-type: none"> ➤ To provide specialist expertise – e.g. Radiation, Ecological, Flora & Fauna, Fisheries, Macro-invertebrate monitoring. ➤ To assist the Company to drive continual improvement and align with leading practice. 	<ul style="list-style-type: none"> ➤ As required – site visits, email, meetings, contract reviews etc 	HSSEC Manager	GM IRCS

f. PROVINCIAL (CABO DELGADO) – STAKEHOLDER ENGAGEMENT PLAN


STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Department of Labour AND Department of Immigration	<ul style="list-style-type: none"> ➤ Critical to the processing of Visa/ Work Permits for Expatriates; ➤ Audit processing of documentation for not only Twigg but contracting partners; ➤ Allocation of STWP and LTWPs; ➤ Maintain compliance to Mozambique Labour Law. 	<ul style="list-style-type: none"> ➤ Keep up to date with any legislative changes regarding expatriates working in country; ➤ Foster relations for understanding project and need for requests; ➤ Manage LTWP Quotas and ratios; ➤ Expedite the STWP and LTWP process when required or ask for additional support. 	<ul style="list-style-type: none"> ➤ Quarterly face to face meetings. ➤ Ad-hoc meetings as required. 	People & Eng Mgr IR Officer	GM IRCS
Cabo Delgado Governor	<ul style="list-style-type: none"> ➤ Critical for maintaining the Company's "License to Operate" with the ability to suspend operations following a significant (potential) incident; ➤ Overall management for Cabo Delgado Province; ➤ Conduit to National Government levels; ➤ High degree of influence over policy creation and implementation; ➤ Integral to Mining Agreement execution; ➤ Conduit into other key stakeholders with the ability to raise the profile of the Company and solicit support for operations; 	<ul style="list-style-type: none"> ➤ Maintain productive relationship with local government in support of Balama Operations; ➤ Remain abreast of key developments in Cabo Delgado and greater Mozambique; ➤ Support Twigg to resolve any government departmental issues; ➤ Acquire intelligence on critical security incidents; ➤ Ability to engage / intervene with key stakeholders on behalf of the Company to resolve complaints / disputes. 	<ul style="list-style-type: none"> ➤ Quarterly face to face meetings ➤ Ad-hoc meetings as required 	GM IRCS GM Balama Ops	MD & CEO COO
Provincial Government Directors	<ul style="list-style-type: none"> ➤ Conduit to the Governor; ➤ Specialist support in their areas of influence and expertise; ➤ Conduit to National Government levels; ➤ High degree of influence over policy creation and implementation; ➤ Conduit into other key stakeholders with the ability to raise the profile of the Company and solicit support for operations; 	<ul style="list-style-type: none"> ➤ Assist in obtaining meetings with the Governor when required; ➤ Keep abreast with any legislative changes that may impact operations; ➤ To understand the Provincial agenda and the benefit the operation brings to each area of government such as VAT. licencing approvals etc; ➤ Strategic stakeholders in maintaining Company's license to operate. 	<ul style="list-style-type: none"> ➤ Quarterly face to face meetings ➤ Ad-hoc meetings as required 	People & Eng Mgr IR Officer	General Managers Operations and IRCS
ARA NORTE	<ul style="list-style-type: none"> ➤ Ability to make and execute decisions that can influence water availability for the project; ➤ Ability to positively / negatively influence a number of key Government regarding the operations; ➤ Ability to facilitate or hinder key initiatives and associated outcomes; ➤ Issuing Authority for the Water Extraction License. 	<ul style="list-style-type: none"> ➤ To ensure alignment is maintained between this department and relevant government bodies; ➤ Keep them abreast on operational performance (e.g. water consumption) & continual improvements; ➤ A source of support, capacity building and guidance. 	<ul style="list-style-type: none"> ➤ Quarterly face to face meetings ➤ Ad-hoc meetings as required. 	Fin Controller IR Officer	COO / ExCo General Managers Operations and IRCS

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Director of Finance and Director of Tax Authority	<ul style="list-style-type: none"> ➤ Critical for statutory financial reporting of Twigg; ➤ Assistance in submitting VAT refunds and reimbursements; ➤ Audit capability of Twigg registered financials and business; ➤ Connection to departments at National Level; ➤ Processing of tax certificates when required; 	<ul style="list-style-type: none"> ➤ To ensure relationship are strong to carry through any financial reporting challenges; ➤ To provide assistance at a National Level for VAT processing; ➤ To ensure smooth release of tax certificates when required. 	<ul style="list-style-type: none"> ➤ Monthly face to face meetings ➤ Monthly Reporting 		
Banking Providers (Standard Bank/BCI)	<ul style="list-style-type: none"> ➤ Releasing payments for international payments and prepayments; ➤ Ability to suspend payments if compliance of documentation is not met for importation of goods under prepayment scheme; ➤ Processing of Bonds for Mining Agreement within strict guidelines and demands associated with those requirements. 	<ul style="list-style-type: none"> ➤ To ensure the strength in relationships allow us some flexibility when pressure points arise with payment release under urgency; ➤ To ensure legislative requirements are being met and we are keeping abreast of new legislation; ➤ To facilitate priority focus and customer service for day to day transactional banking; 	<ul style="list-style-type: none"> ➤ Ad-hoc meetings as required ➤ Regular Email communications. 	Fin Controller GM IRCS	CFO
Twigg Management Team	<ul style="list-style-type: none"> ➤ Ability to implement decisions and work instructions that require Provincial notification / engagement and could impact relations; ➤ Agents for disseminating and enforcing commercial initiatives and developments; ➤ Key customer and target for commercial, travel and immigration services. 	<ul style="list-style-type: none"> ➤ Ensure Twigg Managers are managing their provincial stakeholder engagements / relations as required; ➤ Educate Management as to the requirements, limitations and opportunities that exist under the Mozambique regulations; 	<ul style="list-style-type: none"> ➤ Weekly face to face meetings and one-on-ones; ➤ Monthly Managers Meetings; ➤ Monthly Reporting; ➤ Ad-hoc as required; ➤ Ongoing and daily engagement. 	People & Eng Mgr Fin Controller	GM IRCS
Procurement Team (Balama/Perth)	<ul style="list-style-type: none"> ➤ Key relationship holder with Vendors; ➤ Ability to influence supplier payment terms and conditions through vendor contract management; ➤ High degree of influence over operations though timely procurement of goods and services required by the business; ➤ Direct oversight of the warehouse and inventory control with third party vendor. 	<ul style="list-style-type: none"> ➤ Assist in establishing credit controls through contract terms and conditions; ➤ Maintain good vendor relations to assist when hurdles present; ➤ Conduct stocktake processing and maintenance of ERP (Pronto); ➤ Critical spares management for operations 	<ul style="list-style-type: none"> ➤ Weekly face to face meetings and one-on-ones; ➤ Monthly Managers Meetings; ➤ Monthly Reporting ➤ Ad-hoc as required; ➤ Ongoing and daily engagement. 	Fin Controller	GM IRCS
DANA Agency (Travel Agency)	<ul style="list-style-type: none"> ➤ Provide travel booking and advice for travel requirements; ➤ Ability to provide emergency planning for any major events; ➤ Allows effective staff movement with little disruption to the business; 	<ul style="list-style-type: none"> ➤ Allows for in country MZN spend of currency for critical service; ➤ Assists in maintain partner agreements with airlines; ➤ Keep our workforce moving in the most cost effective and timely manner; ➤ Provides emergency support for individuals travelling; 	<ul style="list-style-type: none"> ➤ Monthly Reporting; ➤ Ad-hoc as required; ➤ Ongoing and daily engagement via telephone / email. 	Corporate Administration Supervisor	People & Eng Mgr

g. CENTRAL (MAPUTO) – STAKEHOLDER ENGAGEMENT PLAN


STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Prime Minister	<ul style="list-style-type: none"> ➤ Ability to resolve complex and multisector issues across Mozambique through his competency as Chief of Government; ➤ Authority to renew/ suspend / revoke all licenses to operate – e.g. Water Extraction, DUAT, Mining, Environment, Construction etc; ➤ Ability to support / constrain all supply chain activity in and around Mozambique including Port access and shipping; ➤ Ability to influence financial support from Mozambique Finance Institutions – e.g. Central / Standard Bank, Barclays etc.; and ➤ Ability to materially alter the terms of the Mining Agreement including royalties, extraordinary direct benefit payments etc. 	<ul style="list-style-type: none"> ➤ To resolve all material issues that could not be resolved at lower levels of Government; ➤ To ensure alignment across Government Departments / Council of Ministers; ➤ To raise the profile of the Company and celebrate achievements of the Mozambique people; ➤ To protect and maintain the Company's license to operate and pave the way for growth. ➤ To ensure the Company delivers on the commitments made in the Mining Agreement; 	<ul style="list-style-type: none"> ➤ Annual meetings; ➤ Annual / two-yearly site visits ➤ Company events ➤ Formal correspondence; ➤ As requested by the Prime Minister 	COO / ExCo GM IRCS	BOARD MD & CEO
National Minister for Minerals and Energy (MIREME)	<ul style="list-style-type: none"> ➤ Ability to introduce new legislation that may help or hinder operations at the Balama Graphite Operation; ➤ Ability to conduct audits and inspections of the Operations and impose punitive outcomes for serious non-compliances; ➤ Ability to follow up performance through reports, payment of production tax and level of production; and ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ To ensure the Central Government remains informed as to company mining performance; ➤ To ensure the company remains compliant with legislation; ➤ To ensure the company remains informed of the key priorities of the Directorate; ➤ To establish stable relationships and protect and maintain the Company's license to operate; ➤ To raise the profile of the Company and celebrate achievements of the Mozambique people; ➤ To ensure the Company delivers on the commitments made in the Mining Agreement; 	<ul style="list-style-type: none"> ➤ Annual meetings; ➤ Annual site visits ➤ Company events ➤ Formal correspondence; ➤ As requested by the Minister; ➤ Quarterly / annual reporting 	COO / ExCo GM IRCS	MD & CEO
National Director of Employment & Professional Training and Labour Studies (IFPELAC)	<ul style="list-style-type: none"> ➤ Ability to materially impact / change the Memorandum of Understanding (MOU) for the Balama Training Centre; ➤ Ability to introduce new legislation that may help or hinder operations at the Balama Graphite Operation; 	<ul style="list-style-type: none"> ➤ To ensure that the Twigg-IFPELAC relationships is consistent with the terms of the MOU; ➤ To leverage support and technical training competency to maximise the effectiveness of training programs; 	<ul style="list-style-type: none"> ➤ Annual meetings; ➤ Annual site visits ➤ Company events ➤ Formal correspondence; ➤ As requested by the Director; ➤ Quarterly / annual reporting 	COO / ExCo GM IRCS	MD & CEO

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	<ul style="list-style-type: none"> ➤ Ability to conduct audits and inspections of the Operations and impose punitive outcomes for serious non-compliances; ➤ Ability to follow up performance through reports; and ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ To ensure all training outcomes are nationally certified and recognised as ‘best practice’; ➤ To ensure the Company delivers on the commitments made in the Local Development Agreement; ➤ To keep abreast of changes in learning strategies and or legislation; and ➤ To explore future joint venture / third party partnerships and external funding opportunities. 			
Ministry of Labour Employment and Social Security	<ul style="list-style-type: none"> ➤ Ability to introduce new legislation that may help or hinder the Balama Graphite Operation; ➤ Ability to conduct audits and inspections of the Operations and impose punitive outcomes for serious non-compliances; ➤ Ability to follow up performance through reports, payment of INSS and IRPS; ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance; ➤ Ability to influence Company Level Agreement negotiations and relationships / outcomes with SINTICIM ➤ Ability to positively/negatively influence quota levels and associated expatriate skilled labour levels. 	<ul style="list-style-type: none"> ➤ To ensure the Ministry of Labour remains informed on employment performance / demographic of Company workforce – e.g. local, regional, national and expatriate; ➤ To ensure the company remains complaint with, and changes to, legislation; ➤ To ensure the company remains of key priorities of the Directorate; ➤ To ensure the Company delivers on the commitments made in the Mining Agreement; ➤ To protect and maintain the Company’s license to operate and pave the way for growth. 	<ul style="list-style-type: none"> ➤ Annual meetings; ➤ Annual site visits ➤ Company events ➤ Formal correspondence; ➤ As requested by the Minister; ➤ Quarterly / annual reporting 	COO / ExCo GM IRCS	MD & CEO
Confederation of Business Association in Mozambique (CTA).	<ul style="list-style-type: none"> ➤ Ability to contribute / influence the development of legislation; ➤ Ability to influence Government about what constitutes a Good Business Environment in Mozambique; ➤ Ability to discuss with Government and Unions about the minimum salary and other topics arising. ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. ➤ Ability to lobby Government to attract and retain foreign investment. 	<ul style="list-style-type: none"> ➤ To ensure the commercial landscape remains attractive / viable to foreign investment; ➤ To ensure the Company is perceived as an active and good corporate citizen; ➤ To facilitate doing business in Mozambique and to navigate sovereign bureaucracy; ➤ To establish stable relationships and protect and maintain the Company’s license to operate; ➤ To raise the profile of the Company and celebrate achievements of the Mozambique people; 	<ul style="list-style-type: none"> ➤ Association meetings; ➤ Annual site visits ➤ Company events ➤ Formal correspondence; 	GM IRCS	COO / ExCo

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Ministry of Public Works, Housing and Hydric Resources – National Directorate of Management of Hydric Resources	<ul style="list-style-type: none"> ➤ Ability to introduce new legislation that may help or hinder the Balama Graphite Operation Project – e.g. water & construction law; ➤ Ability to conduct audits and inspections of the Project and impose punitive outcomes for serious non-compliances; ➤ Ability to follow up performance through reports and site visits; ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance; and ➤ Ability to influence the renewal / revocation of water extraction and discharge license; 	<ul style="list-style-type: none"> ➤ To ensure the Central Government remains informed as to company water consumption; ➤ To ensure the company remains complaint with legislation; ➤ To ensure the company remains informed of changes in the legislation and or the key priorities of the Directorate. 	<ul style="list-style-type: none"> ➤ Annual site visits ➤ Company events ➤ Formal correspondence; ➤ Ad-hoc and regular meetings; ➤ Quarterly / annual reporting 	GM IRCS	COO / ExCo
Central Bank	<ul style="list-style-type: none"> ➤ Ability to govern and alter monetary policy across Mozambique resulting in material change to the commercial environment; ➤ Acting as the banker for the State and associated financial institutions and can influence investment / policy decisions; ➤ Ability to impact the competitiveness and efficiency of the financial system within Mozambique and ensuring its integrity; ➤ Holds and maintains the foreign exchange reserves and maintains the value of the exchange rate of the currency. 	<ul style="list-style-type: none"> ➤ To obtain support / advice to remain compliant with financial regulation and policy; ➤ To request advice pertaining to Value Add Tax (VAT) rebates to alleviate cash pressure; ➤ To obtain advice / support on foreign exchange related matters; ➤ To ensure financial backing and raise the profile of the Company as a good Corporate Citizen. 	<ul style="list-style-type: none"> ➤ Ad-hoc meetings as required; ➤ Company events; ➤ Formal correspondence; ➤ Site Visits as required 	CFO / ExCo GM IRCS	MD & CEO
Minister of Economy & Finance	<ul style="list-style-type: none"> ➤ Responsible for economic & financial policy, budgeting, tax policies, public spending, public investment planning, monitoring and oversight of public financial management, debt management and State stockholdings; ➤ Coordinates public finance intervention in keeping with the stability and convergence criteria established by the EU; ➤ Prepares economic and financial projections and monitors general spending and revenue trends; ➤ Prepares the revenue and financial accounts for public administrations, oversees all phases of the national budget, and assesses the economic and financial effects of laws and policies; ➤ Prepares public finance documents; 	<ul style="list-style-type: none"> ➤ To obtain support / advice to remain compliant with economic & financial policy; ➤ To ensure credible relationship exist to support the Company through any economic / financial challenges that may arise; ➤ To better understand potential / imminent economic & financial reforms and or key budget developments that are likely to impact the Company; ➤ To keep the Ministry abreast of key Company developments / performance and to highlight the challenges / pressures experienced by the private sector; ➤ To raise the profile of the Company and celebrate achievements of the Mozambique people. 	<ul style="list-style-type: none"> ➤ Annual / bi-annual meetings; ➤ Annual site visits; ➤ Company events; ➤ Formal correspondence; ➤ As requested by the Minister; ➤ Reporting as required. 	COO CFO / ExCo GM IRCS	MD & CEO

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	<ul style="list-style-type: none"> ➤ Conduit to Council of Ministers with the ability to negatively / positively feedback on Company activities and performance. 				
Mozambique Tax Authority	<ul style="list-style-type: none"> ➤ Responsible for the collection of Government tax revenue with the ability to investigate tax evasion claims and issue punitive sanctions (e.g. fines) for non-compliance; ➤ Manages the Mozambique taxation regime and associated administrative processes with the view to streamlining where possible to maximise revenue collection and align with leading practice; ➤ Ability to submit proposals of law to Parliament recommending changes to the Mozambique taxation system that could have a positive / negative impact to the Company; ➤ Ability to implement tax reforms in Mozambique that could result in material changes to the commercial environment with a positive / negative impact to the Company; ➤ Reviews, prioritises and authorises VAT exemptions for Mozambique mining entities; ➤ Conduit to Council of Ministers with the ability to negatively / positively feedback on Company activities and performance. 	<ul style="list-style-type: none"> ➤ Key stakeholder in the review / authorisation of the Company's VAT exemption application; ➤ To ensure credible relationship exist to support the Company through any financial, taxation or revenue challenges that may arise; ➤ To better understand potential / imminent tax reforms and their likely impact on the Company; ➤ To keep the Tax Authority abreast of key Company developments and highlight to Government the challenges / pressures experienced by the private sector; ➤ To raise the profile of the Company and celebrate achievements of the Mozambique people. 	<ul style="list-style-type: none"> ➤ Annual meetings; ➤ Annual site visits; ➤ Company events; ➤ Formal correspondence; ➤ As requested by the Minister; ➤ Quarterly / annual reporting. 	COO CFO / ExCo GM IRCS	MD & CEO
<p>Empresa Moçambicana de Exploração Mineira (EMEM)</p> <p>Mozambique Mining Company</p>	<ul style="list-style-type: none"> ➤ Signatories to the Company's Quota holders Agreement. ➤ Mozambique owned state mining company that aims to increase state mining activity participation, improve local content and establish local processing capability in an effort to generate revenue and boost the industrialisation process. ➤ Manages state shares in mining companies; ➤ Safeguards State interests in the mining sector; ➤ Actively promotes national and foreign investment in the mining sector and incentivises its growth; ➤ Provides consultancy and technical assistance in the mining sector. ➤ Ability to negatively / positively feedback on Company activities and performance to central government. 	<ul style="list-style-type: none"> ➤ To obtain consultancy / technical advice relative to Company mining activities; ➤ To ensure ongoing alignment with the key terms of the Quota holders Agreement; ➤ To optimise the efficiency of the Twigg Board. ➤ To ensure credible relationship exist to support the Company through any challenges that may arise; ➤ To better understand potential / imminent mining sector reforms and or key developments that are likely to impact the Company; ➤ To keep EMEM abreast of key Company developments / performance; and ➤ To raise the profile of the Company, celebrate the achievements of the 	<ul style="list-style-type: none"> ➤ Annual meetings; ➤ Annual site visits; ➤ Company events; ➤ Formal correspondence; ➤ As requested by the Minister; ➤ Reporting as required. 	COO / ExCo GM IRCS IR Officer	MD & CEO

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		Mozambique people and protect the Company's license to operate.			
CTA – Confederation of Trading Association	<ul style="list-style-type: none"> ➤ Ability to negatively / positively feedback on Company activities and performance to central government ➤ Actively promotes national and foreign investment in the mining sector and incentivises its growth ➤ Ability to induce the adoption of new laws that create a better business environment 	<ul style="list-style-type: none"> ➤ Obtain support / influence to achieve Twigg's goals / concerns from the Government ➤ To ensure credible relationship exist to support the Company through any challenges that may arise; ➤ Supporting the Mozambican mining sector development by transmitting Twigg's experience 	<ul style="list-style-type: none"> ➤ Association meetings; ➤ Annual site visits ➤ Company events ➤ Formal correspondence ➤ Quarterly / annual reporting ➤ Ad-hoc meetings as required; 	IR Officer	GM IRCS

h. NACALA – STAKEHOLDER ENGAGEMENT PLAN

STAKEHOLDER	STAKEHOLDER AREA OF INFLUENCE	ENGAGEMENT PURPOSE	ENGAGEMENT FREQUENCY / TYPE	ACCOUNTABLE PERSON	EXECUTIVE SPONSOR
Grindrod	<ul style="list-style-type: none"> ➤ Manage the movement of Company product from Mine to Port and can enable / inhibit logistics throughput be depending on performance; ➤ Ability to represent the Company positively / negatively along the logistics corridor to the community and other stakeholders - e.g. Driver behaviour / conduct, vehicle safety; ➤ Manage all Nacala stakeholder relationships on behalf of the Company, excluding shipping lines; ➤ Holders of the DUAT, Construction and Environmental Licenses and all other regulatory licenses / permits to provide logistics services and operate the CDF in Mozambique on behalf of the Company. 	<ul style="list-style-type: none"> ➤ Manage the delivery of the Supply of Services Contract in accordance with the agreed terms; ➤ Instruction in terms of logistics, port throughput and shipping requirements; ➤ Ensure continual compliance with all license, regulatory and other requirements / conditions; ➤ Ensure productive relationships are maintained with Nacala and other key stakeholders; ➤ Drive continual improvement, monitor costs & provide support to maintain safe / efficient operations; ➤ Provide specialist expertise not readily available within Grindrod – i.e. environmental monitoring; 	<ul style="list-style-type: none"> ➤ Quarterly Review ➤ Bi-weekly and Ad-hoc as required ➤ Daily interactions 	DMCC GM IRCS Export Adm Manager	COO
Central & Provincial Customs Authority	<ul style="list-style-type: none"> ➤ To ensure regulatory & process compliance prior to authorising the export of product from Mozambique; ➤ Ability to expedite / inhibit containers flowing to the Port, subsequently impacting monthly sales volume; ➤ Ability to enforce import / export restrictions and prohibitions which may affect the Company; ➤ Collecting accurate Company export data and reporting activity to the competent authorities. 	<ul style="list-style-type: none"> ➤ Manage expectations in terms of Company logistics throughput requirements; ➤ To maintain license to export product from Mozambique; ➤ To optimise the efficiency of the export process; ➤ To keep abreast of any changes to customs export regulations and or requirements. 	<ul style="list-style-type: none"> ➤ Daily interactions in Nacala; ➤ Bi-annual engagement with the Director General of Customs. 	Export Manager GM IRCS	COO
CDN (Port Authority)	<ul style="list-style-type: none"> ➤ CDN holds the Government concession for the Port of Nacala; ➤ Control Port capacity / availability to optimise the efficiency of container throughput onto ships; ➤ Solicit support for the Company from other Nacala key stakeholders to maximise container throughput; ➤ Control container in-flow and lay-down timeframes at the Port relative to monthly berthing schedule; ➤ Determine vessel berthing schedule according to shipping line availability / feedback; 	<ul style="list-style-type: none"> ➤ To ensure a clear plan exists on a weekly basis to optimise containers into the Port; ➤ To keep the Port informed as to the ever-increasing volume of containers through the Port; ➤ To make sure CDN have the capacity to accommodate Company containers in line with ramp-up; ➤ To keep abreast of key issues that may impact the Company – e.g. Port expansion works; ➤ To drive continual improvement wherever possible. 	<ul style="list-style-type: none"> ➤ Bi-weekly planning meetings; ➤ Quarterly meetings 	Export Manager	COO

	<ul style="list-style-type: none"> ➤ Provide additional Port availability (e.g. open on Sundays) and can request additional support from Customs to maximise throughput; 				
Kudumba	<ul style="list-style-type: none"> ➤ Provide container scanning infrastructure at Port to detect unauthorised contents & inhibit illegal trade; ➤ Ability to expedite or inhibit containers flowing in to the Port; 	<ul style="list-style-type: none"> ➤ To optimise throughput of containers into the Port. 	<ul style="list-style-type: none"> ➤ Ad-hoc as required; 	Export Manager	COO
Balama Graphite Operation (BGO)	<ul style="list-style-type: none"> ➤ Controls product volume availability and the coordination & execution of all dispatch activity at the BGO; ➤ Administers sales order documentation and prepares dispatch line accordingly for ease of loading; ➤ Ability to enable / inhibit dispatch performance relative to the efficiency of the above activities. 	<ul style="list-style-type: none"> ➤ To optimise the operations– logistics interface to safely & reliably meet customer expectations; ➤ Support logistics / CDF operations as required – e.g. critical incident response / environmental monitoring. 	<ul style="list-style-type: none"> ➤ Weekly S&OP Meetings; ➤ Monthly Ops Meetings 	Export Manager Prod Hand Manager	CCO
Shipping Lines	<ul style="list-style-type: none"> ➤ Provide vessel space to carry Company product from Mozambique to the customer; ➤ Ability to enable / inhibit sales performance via variable shipping schedules, cancelled ships, provision of empty containers etc; ➤ Provide Bill of Lading (BoL) to Company with payment times minimised via timely issue of documentation; ➤ Ability to increase / decrease shipping costs relative to market conditions, impacting C2 cost structures; 	<ul style="list-style-type: none"> ➤ To maintain competitive tension across the four major shipping lines - e.g. rates, vessel / space availability, empty containers, detention times, BoL issuing times; ➤ Reduce costs, maximise export volumes and create contingency in the event of shipping line cancellations; 	<ul style="list-style-type: none"> ➤ Daily; ➤ Monthly 	COO	DMCC;
Ministry of Mineral Resources & Energy (MIREME)	<ul style="list-style-type: none"> ➤ Inspect containers at Port and verify for sealing in preparation for customs clearance; ➤ To ensure regulatory & process compliance prior to authorising the export of product from Mozambique; ➤ Ability to expedite / inhibit containers flowing to the Port, subsequently impacting monthly sales volume; ➤ Ability to enforce import / export restrictions and prohibitions which may affect the Company; ➤ Ability to introduce new legislation that may help or hinder logistics throughput; ➤ Ability to conduct CDF audits and inspections and impose punitive outcomes for serious non-compliances; ➤ Ability to review the payment of revenue / tax commensurate with sales performance; and 	<ul style="list-style-type: none"> ➤ To ensure the Central Government remains informed as to Company / CDF performance and constraints; ➤ To ensure the Company / CDF remains compliant with all applicable legislation; ➤ To ensure the Company / CDF remains informed of the key MIREME priorities and / developments; ➤ To establish stable relationships and protect and maintain the Company's license to operate; ➤ To raise the profile of the CDF and celebrate the achievements of Twigg & the Mozambique people; ➤ To ensure the CDF delivers on the commitments / requirements stipulated in the Mining Agreement; 	<ul style="list-style-type: none"> ➤ Bi-annual engagement with the National Minister of MIREME. 	GM IRCS COO	ExCo;

	<ul style="list-style-type: none"> ➤ Conduit to central government with the ability to negatively / positively feedback on Company activities and performance. 				
Dubai	<ul style="list-style-type: none"> ➤ Booking vessels, managing sales contracts and associated sales order administration; ➤ Ability to help / hinder logistics throughput depending on accuracy and timeliness of documentation; ➤ Ability to pass on client / shipping line feedback regarding bag quality and sales order completeness to drive continual improvement. 	<ul style="list-style-type: none"> ➤ To ensure alignment between pending sales orders, CDF activities / priorities and shipping line availability; ➤ To optimise the sales administration-logistics interface to consistently meet monthly shipping / sales targets; 	<ul style="list-style-type: none"> ➤ Daily interactions 	Export Manager	GM IRCS
Maputo	<ul style="list-style-type: none"> ➤ Location of Council of Ministers and all other Private-Public sector power brokers; ➤ Ability to help or hinder logistics throughput; ➤ Ability to solicit broad-based stakeholder support for CDF operations and associated Port volumes; ➤ Ability to educate Company as to Government and other stakeholder engagement protocols. 	<ul style="list-style-type: none"> ➤ To ensure the Central stakeholders remain informed as to Company / CDF performance and constraints; ➤ To ensure the Company / CDF remains compliant with all applicable legislation & the Private sector agenda; ➤ To establish broad-based stakeholder support for CDF operations & maintain the license to operate; ➤ To raise the profile of the CDF and celebrate the achievements of Twigg, the Port Authority & the Mozambique people. 	<ul style="list-style-type: none"> ➤ Targeted / strategic bi-annual meetings; ➤ Ad-hoc as required 	GM IRCS	COO; ExCo;
Ministry of Industry & Commerce	<ul style="list-style-type: none"> ➤ Issuing Authority of the Twigg Export License with the ability to renew/ revoke / suspend Company's ability to export product from Mozambique to international markets; 	<ul style="list-style-type: none"> ➤ To ensure the Ministry remains informed as to Company / CDF performance and constraints; ➤ To ensure the Company / CDF remains compliant with all applicable Export License conditions; ➤ To keep abreast of key changes / developments that may impact CDF operations / logistics throughput. 	<ul style="list-style-type: none"> ➤ Targeted / strategic bi-annual meetings; ➤ Ad-hoc as required 	GM IRCS	COO; ExCo;

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8. STAKEHOLDER DATA COLLECTION

Collecting detailed information is essential for effective stakeholder interaction. A fit-for-purpose and user-friendly Stakeholder Engagement Register will be maintained to manage the information generated through stakeholder interaction(s). The Stakeholder Engagement Register will provide for data input, synthesis, and review.

The Stakeholder Engagement Register will be included in the Company's monthly Sustainability Report.

9. LIST OF GENERALISED STAKEHOLDER CATEGORIES

Directly Affected Stakeholder Groups	<ul style="list-style-type: none"> • Employees and their families • Labour/trade/vocation-based associations • Shareholders and Owners • Actual and potential lenders • Suppliers, contractors, and their families • Near neighbours, landowners, and land users • Local government councils, representatives, and staff • Local businesses • Chambers of Trade and Commerce • Women's and Men's Associations • Elderly Associations • Youth Groups • Other civic groups – e.g. grassroots community organizations • Religious / faith-based groups • Informal networks and leaders, such as customary chiefs • Local schools, teachers, and school boards. • Health professionals and clinic staff
Other Stakeholder Groups	<ul style="list-style-type: none"> • District, Provincial and Central Government representatives and staff • Regional alliances of industry, faith, and special interest groups • Regulatory departments and regulators • Administrative Staff • National Presidents / Prime Ministers • National Parliament / Legislatures • National Agencies / Ministries and Ministers • National Government officials and staff • Political parties • Potential politicians • Government opposition parties • Security and police forces • Academia and vocational institutes • NGOs that operates in local context with non-local people • National NGOs • International NGOs • International agencies • Foreign embassies and their staff

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Media	<ul style="list-style-type: none"> • Local and Syndicated journalists • Radio stations • Newspapers / newsletters • Internet blogs, websites, forums, social media • Television
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10. MONITORING & REVIEW

This document will be reviewed annually to ensure continual improvement, and on each occasion where there is a material change in the Mozambique stakeholder landscape. This document will also be reviewed following a related significant (potential) incident.

11. DOCUMENTATION & RECORDS MANAGEMENT

This plan shall be maintained as a controlled document in the Company's Document Management System and in accordance with Company Document Control Procedures.

12. DOCUMENTATION AND RECORDS MANAGEMENT

a. Monitoring and Review

Monitor and Review Frequency of this procedure shall occur on a three-yearly basis as determined or if any change is necessary in the process.

b. Documentation Maintenance

This procedure and all supporting work instructions, guidelines and forms shall be maintained as a controlled document in Syrah's Document Management System and in accordance with Syrah Resources Document Control Procedure.