Balama Graphite Project– Twigg Exploration & Mining Ltd

ENVIRONMENTAL AUDIT REPORT – OPERATIONAL PHASE

January 2021

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AUDIT REPORT FOR THE BALAMA GRAPHITE PROJECT – TWIGG EXPLORATION AND MINING LTD

Audit reference:	Environmental Audit – operational phase
Report status:	Final Report (25.01.2021)
Standards:	Environmental and Social Management Plan and Monitoring Program; Environmental, Social and Health Impact Assessment
Date of Audit	15 – 18 December 2021
Auditors:	Luciana Santos and Herberto Nhampanze

Signed by:

(Luciana Santos, Independent Lead Auditor) (Herberto Nhampanze, Independent Co-auditor)

Approved by

(John Hatton, Impacto Representative)

Maputo, 25 January 2021

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Acronyms and Abbreviations

EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ERP	Emergency Response Plan
ESIA	Environmental and Social Impact Assessment
ESIS	Environmental and Social Impact Study
ESMP&MP	Environmental and Social Management Plan and Monitoring Plan
HIV	Human Immunodeficiency Virus
HR	Human Resources
HSMP	Health and Safety Management Plan
MITADER	Ministry of Land, Environment and Rural Development
MT	Million Tonnes
MTA	Ministry of Land and Environment
Myosh	Twigg Internal Database and Management Software
PAC	Project Affected Communities
PPE	Personal Protective Equipment
RAP	Resettlement Action Plan
ROM	Right of Mine
SDAE	District Services for Economic Activities
SE	Southeast
SOP	Standard Operating Procedures
Stakeholders	Interested & Affected Parties (I&Aps)
STP	Sewage Treatment Plant
SUP	Superintendent
TpA	Tons per annum
TSF	Tailing Storage Facility
TWG	Technical Working Group

Twigg	TWIGG Exploration & Mining Ltd
VIPs	Ventilated Improved Pit
WRD	Waste Rock Dump

EXECUTIVE SUMMARY

TWIGG Exploration & Mining Ltd (TWIGG) is developing a graphite mining project on 30 km^2 (3000 hectares) in Balama District, Cabo Delgado Province. The mining site is approximately 7 km from the town of Balama and 470 km by road south-west to the Port of Nacala, the deepest port in Southern Africa.

TWIGG mines and refines graphite, through an open pit, extracting 2 million TpA of graphite ore. The process of extraction requires a conventional flotation processing. The processing plant has a feed rate of 2 Mt per annum and based on an average head grade of approximately 19% TGC (Total Graphite Content) over the first 10 years of operations, approximately 350,000 tonnes of graphite concentrate will be produced per annum.

This is the fifth independent environmental audit of the project, third after the beginning of operations.

Due to the COVID-19 outbreak, as well as access restrictions to the project site, auditors conducted remote auditing using online platforms such as Teams (for meetings and interviews) and whatsapp video calls to visit key locations. It should be noted that the audit was carried out by the same team that conducted the previous audits, and therefore had detailed knowledge of all Twigg project facilities.

The environmental audit, virtual site inspections, interviews and document review (from 15 – 18 December 2020) were carried out by Impacto Lda staff, Luciana Santos (lead auditor) and Herberto Nhampanze (co-auditor).

It should be noted that the Environmental Management Plan was updated last year, and the audit focused on its compliance. However, the updated EMP is silent on health and safety issues, so the criteria established in the previous EMP for these aspects were therefore used.

As overall findings, TWIGG demonstrated a high level of commitment in effort and resources to designing and installing facilities for environmental protection, including the TSF, fuel farm and power plant, in line with international standards. A total of 143 criteria were audited against compliance (99 biophysical, 32 social and 11 related to the requirements set out by the MTA in the updated EMP approval letter), and there were found zero non-compliances, three partial-compliance and 10 criteria were found to be not applicable. It is therefore concluded that 91%

of the requirements of the EMP are in compliance. The following graph shows the level of compliance with the EMP.

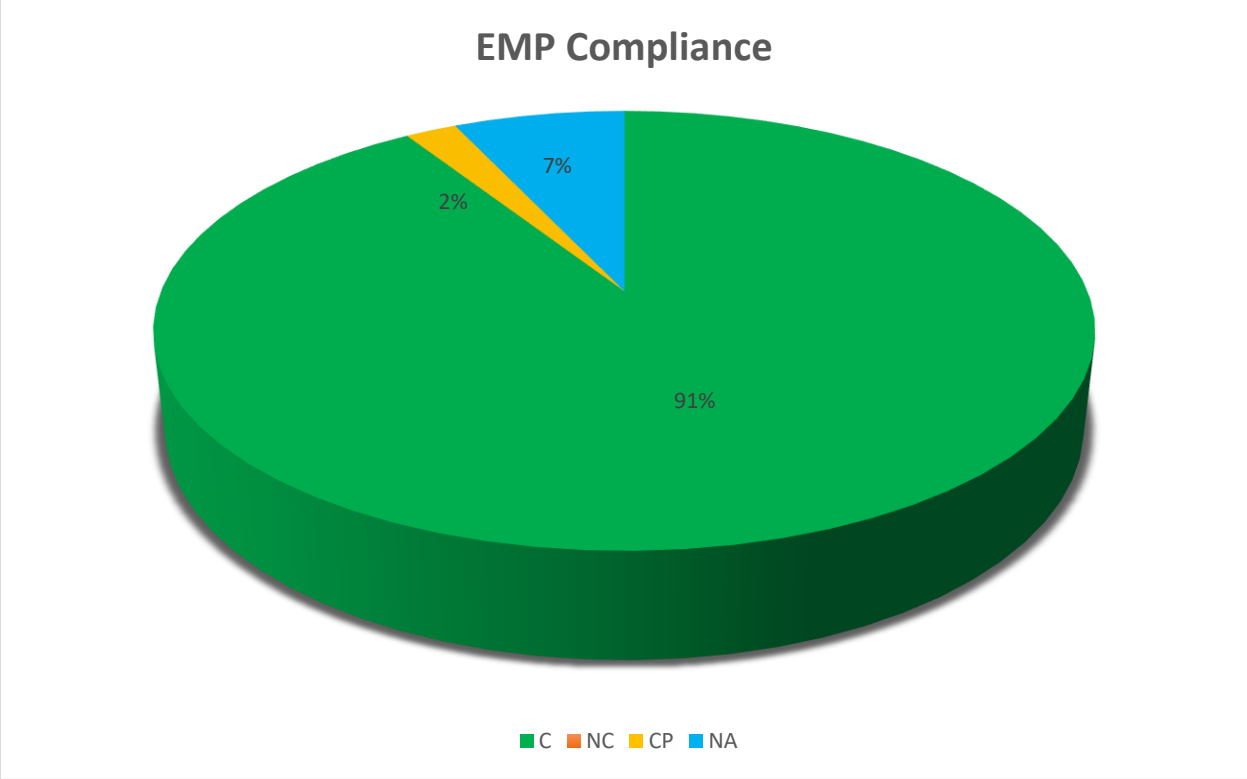

Figure i: Degree of compliance with the EMP

Twigg have been recently certified ISO 14001 and OHSAS 18001 compliant, and have an integrated Environmental, Health and Safety Management System in place. They have recently been recertified (2019) as per ISO 14001:2015 and migrated from OHSAS 18001 to ISO 45001:2018. In 2020, an audit of the ISO 14001:2015 was also carried out.

Additionally, the continued sincerity in efforts to engage with stakeholders, and improve conditions and livelihoods for communities, were highlights, which need to be maintained.

To conclude, it is recommended that an action plan is prepared based on the recommendations of this audit.

1 Introduction

TWIGG Exploration and Mining Ltd., a subsidiary of Syrah Resources Ltd., holds a 106 km² (10600 hectares) Prospecting License in Balama District, and a Mining License for the Balama Graphite Project, which is currently developing over an area of 30 km^2 (3000 hectares), approximately 7 km away from the town of Balama. The mining license application was granted for a period of 23.5 years, with an option to extend the term for a further 25 years. The plant operates 365 days per year.

In terms of the environmental approval for the project, and according to Mozambican Legislation, TWIGG must have an external compliance audit undertaken annually to assess compliance against the Environmental License, Environmental and Social Management Plan and Monitoring Program (ESMP&MP) approved by the Ministry of Land, Environment and Rural Development (MITADER), Environmental, Social and Health Impact Assessment (ESHIA), Mozambican Legislation, and applicable international standards and guidelines.

By the end of 2019, Twigg had updated its Environmental Management Plan, which was approved by the MTA on 27 December 2019.

Twigg has been recently (2019) re-certified ISO 14001:2015 and migrated from OSHAS 18001 to ISO 45001:2018. In 2020 an audit was carried out as part of the ISO 14001:2015 certification.

1.1 Project Overview

TWIGG is operating a graphite mine in the District of Balama. The processing plant has a feed rate of 2 Mt per annum and based on an average head grade of approximately 19% TGC over the first 10 years of operations, approximately 350,000 tonnes of graphite concentrate will be produced per annum. This production profile will make Balama the largest producer of graphite globally, and ideally positioned to meet the anticipated increase in demand from lithium ion battery applications, as well as servicing traditional graphite markets (http://www.syrahresources.com.au/overview).

The land use in the area of the project site is primarily for subsistence agriculture and this remains the case in the surrounding areas. Crops such as maize, cotton, ground nuts, sesame seed and

cassava are grown on the flatter areas, which are cleared using slash and burn techniques. Figure 1 shows the location of the concession area of the graphite mine in Balama.

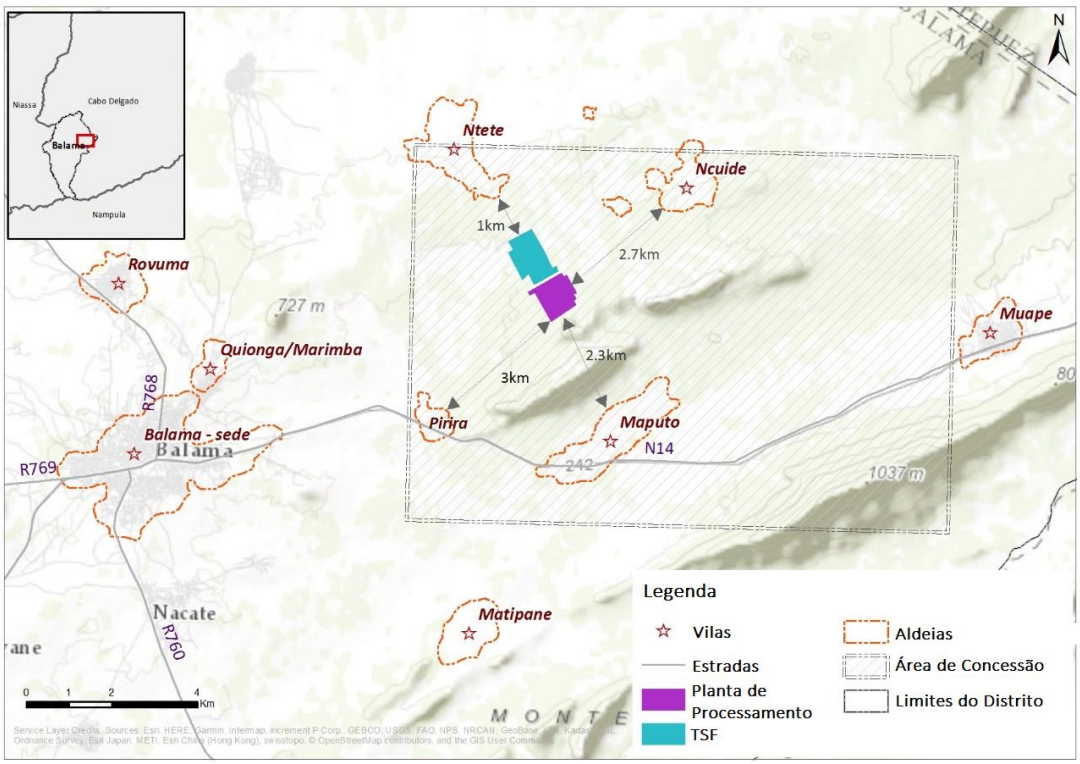

Figure 1 Location of the concession area, including the graphite mine

Figure 2 Google Earth satellite image of the processing plant, west pit, tailings dam (TSF) and camp

1.2 Project Process Description

TWIGG mines and refines graphite through an open pit. The process of extraction requires conventional flotation processing.

The Chipembe dam, located at approximately 13 km northwest of the project site, is the primary source of water (through a pipeline) for the flotation process. It is estimated that 1m³ of water will be required per tonne of processed ore and it has been confirmed that Chipembe dam can supply 2 million m^3. Most of the process water is recovered and used again. The Tailing Storage Facility (TSF) is completely lined, with the water being pumped again to the process water tank. The process water tank has a capacity of 5 thousand m^3 and the only water intake directly from Chipembe is in the beginning of the graphite processing, because this is when the water needs to be free from any residue. The recovery system on the TSF is being refined to increase the rate of reused water and decrease the need of water withdraw from Chipembe Dam.

1.3 Scope of the work

This independent environmental audit sought to review the following: previous audit findings (2019) actions and close out; potential impacts on the environment and public health caused by

mining routine activities; the risks of accidents and contingency planning for evacuation and protection of workers and communities living nearby; compliance with environmental license approval conditions; training programs and records of those responsible for the operation and maintenance of systems and equipment; waste management practices, hazardous materials, noise, dust and vibration records; emergency preparedness and response; and review of plans, programs, reports, as well as other relevant documents related to health, safety, environmental and social performance; visits and interviews in all Twigg Project areas.

It is worth noting that the Environmental Management Plan was updated last year, and the audit focused on its compliance. However, the updated EMP is silent on health and safety issues, so the criteria established in the previous EMP for these aspects were therefore used.

Aspects also assessed taking into account the Environmental Audit Process Decree no. 25/2011, dated June 15, article 4 were:

- The impacts caused on the environment and public health by construction routine activities;
- The risk of accidents and the contingency plans for evacuation and protection of workers and communities living nearby;
- The degree of compliance with approval conditions;
- The level of sources of pollution or environmental degradation resulting from construction activities;
- The conditions of operation and of maintenance of equipment and systems to control and prevent of pollution;
- Measures taken to reinstate the environment and protect human life;
- Training of those responsible for the operation and maintenance of systems and equipment;
- Waste management, hazardous materials, noise and vibration within and outside the site;
- Contingency and Emergency Response Plans in the event of an accident.

1.4 The auditor

The company: Impacto Lda.

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Audit team:

NAME	POSITION	QUALIFICATION
Luciana Santos	Lead Auditor	BSc Hons. Env. Sciences (UFPR); MSc Env. Management and Auditing (FUNIBER)
Herberto Nhampanze	Co-Auditor	BSc Hons. Agronomy (Eduardo Mondlane University);

2 Methodology

Due to the COVID-19 outbreak, as well as access restrictions to the project site, auditors conducted remote auditing using online platforms such as Teams (for meetings and interviews) and whatsapp video calls to visit key locations. It should be noted that the audit was carried out by the same team that conducted the previous audits, and therefore had detailed knowledge of all Twigg project facilities.

2.1 Audit Steps

The audit methodology observed the following steps

- Pre-audit preparations:
  - Establish communications between Auditee and Auditor;
  - Auditor review of the ESMP&MP, ESHIA and 2019 Action Plan;
  - Auditor review of previous audit reports;
  - Preliminary agreement between Auditee and Auditor on an audit plan;
  - Auditor compilation of an audit checklist;
- Site virtual visit:
  - Audit opening meeting between the audit team and key site staff using the Teams Meetings platform;

- Observations via video call by audit team of conditions and practices within the active project site, with interviews by audit team with key site staff from the Auditee (via Teams);
- Review by audit team of documents, records and data associated with project activities;
- Discussion of preliminary audit findings between audit team and Auditee.

- Preparation of the Independent Environmental Audit report, which provides assessment of compliance against approval conditions. Where full compliance was not found, the report provides recommendations aimed at achieving full compliance and improving environmental and social performance of the project.

2.2 Assessment Categories

Four performance categories where defined for the assessment of compliance:

CATEGORY	DESCRIPTION	
Compliant	(C)	In conformity with relevant plans, approvals, commitments, or legislation. The intent and all specific requirements of the conditions have been met.
Partially Compliant	(PC)	Complying only to some of the conditions, representing minor deficiencies and/or low risk.
Non-Compliant	(NC)	Presenting inadequacy to the relevant plans, approvals, conditions, commitments or legislation
Not-Applicable	(NA)	Not applicable to the current operations or stage of the project.

Partially compliant and non-compliant findings are classified according to the extent to which an action has deviated from the ESMP&MP, ESHIA, Environmental License conditions or other relevant approvals or local legislation.

2.3 Audit Plan

Schedule followed for the audit process:

DATES	ACTIVITIES	
PRE-AUDITING		
Week of 7 December	Preparatory activities	• Document (EMP and 2019 Action plan) review; • Definition of scope of work • Identification of key areas; • Preparation of checklist and questionnaires; • Definition of Interview Schedule with TWIGG Technicians and/or Managers.
REMOTE AUDITING – ACTIVITIES		
15 December	Opening Meeting	Attendees: IMPACTO: • Luciana Santos, Lead Auditor; • Herberto Nhampanze, Co-Auditor. Audit opening meeting between the audit team and key site staff to introduce the auditors and discuss the scope of the auditing process and methods to be employed.
	Meeting with HSE staff	Discussion of the Audit Plan and Interview Schedule with TWIGG technicians and/or Managers, as well as the methods for collecting information.
16 December	Interviews	Interviews with TWIGG key staff, including Environmental Manager and Area Manager.
17 December	Interviews and Document Review	Further interviews with TWIGG key staff as necessary. Document review.
18 December	Closeout Meeting	The closeout meeting is to provide an overall feedback, including a broad discussion of the main audit findings.
POST-AUDIT ACTIVITIES		
20 December – 15 January	Report	Data analysis, document review and preparation of the audit report.

2.4 Staff interviewed

The following staff was interviewed during the audit:

- [redacted] – Environmental Superintendent;
- [redacted] – Social Superintendent;
- [redacted] – Geology Superintendent;
- [redacted] – Emergency Services Superintendent.

3 Audit Findings

Table 1 Compliance with the requirements of the EMP approval letter

N.º	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
1	Full compliance with the mitigation measures listed in the EISR, as well as the Environmental Management Plan previously approved by MITADER and the current Environmental Management Plan.					TWIGG has a Health, Safety and Environment Department which is responsible for ensuring compliance with environmental and health and safety management measures. The mitigation measures included in the EIA Report and in the EMP are part of the activities carried out by this department.	Sustainability Report November 2020
2	Compliance with the recommendations of the National Atomic Energy Agency regarding radioactivity safe limits to public health, both during the exploration phase and the ore transportation phase.					TWIGG holds a License for the use of radioactive sources, in accordance with Decree 71/2018 of 16 November. All personnel who handle radioactive materials have received specific training, including health and safety procedures, and have been authorised by ANEA. These workers also use specific Personal Protective Equipment. TWIGG continuously monitors air quality, which also serves to assess whether there are any radioactive emissions at the site.	Licence for use of radioactive sources issued in December 2020 Certificates issued to 4 workers that handle radioactive materials Attendance list of training session on radiation protection held on 2 April 2019
3	Monitoring of possible risk sources for public health and the environment.					Monitoring of risk sources includes other associated risk sources such as malaria, dust and noise, in addition to radioactive sources.	Sustainability Report, November 2020 page 8 section 2.5.3; Source Radiation Monitoring Data, page 9 section 2.6 Malaria
4	Compliance with Decree 94/2014 of 31 December (Regulation on Urban Solid Waste Management) and Decree 83/2014 of 31 December (Regulation on Hazardous Waste Management)					There is a waste management procedure which contains the list of waste and its classification. Classification is made according to segregation and the country's waste regulations. The Management Plan refers to waste that can be recycled and reused, such as wood (reused by local institutions for fuel), metal (sold to a company that reuses it), cooking oil	Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020

N.º	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
						(reused for making soap), rubber tyres (reused by the Agricultural Institute for slope stabilization). Water bottles are reused by an NGO in Pemba to build houses.	
5	Implementation of the Biodiversity Management Plan to ensure conservation and help maintain the benefits of ecosystem services.					TWIGG does not have a formal Biodiversity Management Plan. However, measures that fall under this scope are being implemented, such as the Aquatic and Terrestrial Flora and Fauna Monitoring, which was carried out in 2019. In fact, the EMP recommends that it should be carried out every 5 years.	Aquatic Ecology Assessment Report on Riverine Resources in the vicinity of the Balama Graphite Mine Project, Cabo Delgado, July 2019
6	Ensuring the smooth operation of the sanitation systems.					All project infrastructure has been built to international quality standards. The sanitation systems are operating properly.	Layout of site infrastructure and residential area infrastructure
7	Training of workers on disease prevention, with emphasis on tuberculosis, STI/HIV-AIDS, cholera, malaria, including personal and community hygiene practices.					TWIGG has conducted training sessions for its workers, not only for disease prevention, with emphasis on tuberculosis, ITS/HIV-AIDS, cholera, malaria, but also to prevent the spread of Covid-19.	Training Attendance Register from the meeting held on 27th of August 2020
8	Compliance with the Environmental Regulation for Mining Activities, approved by Decree 26/2004 of 20 August, with regard to the Environmental Guarantee.					TWIGG has been complying with this legal requirement by paying an annual fee; the last payment will be due in December 2020.	Proof of payment of Guarantee dated 30 December 2019 Interview with the Environment Superintendent
9	Compliance with Decree 25/2011 of 15 June, approving the Regulation on the Environmental Audit Process.					This report is the result of another audit carried out by TWIGG.	Contract between TWIGG and Impacto
10	Emergency situations in a Category A Project require coordination with external parties. Any unforeseen event should be reported to the District Administration and					Communications with the authorities include the Central authorities concerned, namely AQUA and the National Mining Institute.	Environmental and Social Performance Report Submission Letter - January to

N.º	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
	to the Provincial Government through DPREME, in addition to MIREME and MITADER (currently MTA), in order to make communication and reaction of stakeholders more efficient.						June 2020, Ref:346/07/TWIGG-IRCS/2020. Date: 29/07/2020
11	Submission of biannual environmental monitoring reports to AQUA, National Directorate of Environment, National Mining Institute, Provincial Directorate of Land and Environment in Cabo Delgado and Balama District Authorities.					The biannual environmental monitoring reports are submitted to AQUA, National Directorate of Environment, National Mining Institute, Provincial Directorate of Land and Environment in Cabo Delgado and Balama District Authorities.	Environmental and Social Performance Report Submission Letter - January to June 2020, Ref:346/07/TWIGG-IRCS/2020. Date: 29/07/2020
12	All documents related to Social Responsibility initiatives.					All social responsibility initiatives were defined in the Community Development Agreement signed in 2017, between TWIGG, Balama District Authorities and local Communities. Compliance with these initiatives is recorded and documented in the Environmental and Social Performance reports, which is also shared with AQUA, National Directorate of Environment, National Mining Institute, Provincial Directorate of Land and Environment in Cabo Delgado and Balama District Authorities.	Environmental and Social Performance Report - January to June 2020

Table 2 Compliance with biophysical requirements

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
1.	**Water Resources Management Program**	Waterproofing the tailings dam and dams intended to store water from the runoff of the ore piles with high sulphur content, in order to prevent the infiltration of contaminants into the groundwater system;					The tailings dams and all the dams for storing water are duly waterproofed.	Visual observation
2.		Build around the waste dumps and the tailings dam or other sources of contaminants, drainage channels and sedimentation basins for the management of rainwater runoff (separating clean waters from potentially contaminated).					There are drainage channels around all waste rock dumps and tailings dams.	Visual observation
3.		Ensure that the effluent from the toilets (black water) is treated before its final disposal, and ensure its reuse whenever possible.					There are two water treatment plants on the site, where the water is treated and reused for keeping roads moist within the concession area.	Monthly monitoring report of the water produced by the STP (Intertek) dated 16.11.2020
4.		To privilege the reuse of water by decanting the tailings in the tailings dam (TSF), treating effluent, capturing and storing rainwater from the runoff from the operational areas.					Processing is a closed system, where water is always recycled. Water reuse occurs in a cycle of closed loop with no discharge into the environment.	Design of the plant
5.		Establish a network for monitoring the quality of surface and ground water (monitoring holes) in order to verify the effectiveness of the existing environmental control systems and operational procedures on the protection of water quality.					Surface and underground water quality monitoring is carried out every three months.	Surface water quality monitoring report (Intertek) dated 11.12.2020 Groundwater quality monitoring report (Intertek) dated 20.11.2020

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
6.		Establish a hydrogeological model of the mine (Project) and update it regularly with intervals not exceeding 24 months.					Terms of Reference have been drawn up to carry out the work and a consultant has already been identified to perform the work. A gap analysis was undertaken in March 2020 in order to go ahead with the design of the model. Due to travel and site access restrictions imposed by the Covid-19 pandemic the work cannot be completed in 2020 and is therefore scheduled for completion in 2021.	ToR for designing a hydrogeological and geochemical model, dated September 2019 Gap analysis: brief hydrogeology, geochemistry and surface water review of Balama Graphite Mine. Geostratum, March 2020
7.		Maintain updated the surface water pollution control systems design (drains and dams) whenever new work / mining fronts begin, to ensure that there is sufficient capacity to prevent rainwater draining over the mine's operational area from being drained for the environment.					Within the scope of the environmental monitoring plan, drainage monitoring is carried out, especially during the rainy season. This work is done regularly and always precedes the opening of new work fronts.	Drainage monitoring report (Intertek) dated 21.01.2020
8.		Waterproofing the base of the ore storage area (RoM) with a layer of clay or other material to prevent the infiltration of the water that flows over the RoM into the water table.					During construction of the RoM base, the soil was moistened and compacted. Clay material is used to waterproof the area.	Detailed design study. Snowden Group. August 2015
9.		Ensure that areas / activities with the potential to generate hydrocarbon spills are duly taken care of to contain accidental spills or spills through appropriate and appropriate mechanisms for each situation.					There are detention ponds and spill kits in all these areas. Spill kits are properly sealed to ensure they contain the necessary equipment.	Visual observation
10.		The washing of mobile equipment must be carried out in a dedicated place and the place must have a mechanism for separating water and oil from the effluent from this activity.					Mobile equipment is washed at designated locations. There is always an oil/water separator at these designated locations.	Visual observation

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
11.		Ensure that the material with the potential to form acid, better known as PFA, is identified during mining and when possible encapsulated with the non-acid forming material - NFA in the mine waste deposit.					Mining materials are analysed in the laboratory. The sulphur content is duly analysed. The material with acid-forming potential has a sulphur content of 7 - 9 %. This material is extracted and used in the plant. In order to avoid acid drainage, the plant operating procedure specifies that all material in the RoM must be used before the rainy season. There is a plan in the pipeline to waterproof the drainage channels that have the potential to discharge acid mine drainage (along the RoM and adjacent areas).	Detailed design study. Snowden Group. August 2015
12.		Monitor groundwater quality as established in the monitoring plan of this program.					Monitoring is carried out every three months.	Groundwater quality monitoring report (Intertek) dated 20.11.2020
13.		All personnel who carry out inspection and maintenance at the tailings dam, dams and drains must be properly trained to identify abnormal situations in this environmental control system, such as pipeline leaks, abnormal levels of water in the dam, slope integrity, infiltration signs, integrity of drainage systems, etc.					The consultants who provided support during the construction of the tailings dam also provided initial training to Twigg staff. New workers undergo regular training. There is an internal procedure in place for the Inspection of the tailings dam and dams. Maintenance of the drainage system is done internally as needed to remove all debris, leaves, logs, etc.	ICOPAL Mission Report Tailings dam and dam Inspection procedures BAL-PR-PR-0005 Rev 0, dated 23 October 2020 Tailings dam: construction report. Advisian. 09.10.2018 Verbal communication: Návia Chongo.
14.		Monitor groundwater quality in the 30 sites defined in Table 6 of the EMP.					There is a Groundwater Quality Monitoring Plan in place and monitoring is carried out every three months.	Groundwater quality monitoring report (Intertek) dated 20.11.2020
15.		Monitor surface water quality at the 10 sites defined in Table 7 of the EMP.					There is a Surface Water Quality Monitoring Plan in place and monitoring is carried out every three months.	Surface water quality monitoring report (Intertek) dated 11.12.2020

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
16.		Monitor underground water quality, on a three-month basis, according to the parameters defined in Table 8 of the EMP.					There is a Groundwater Quality Monitoring Plan in place and monitoring is carried out every three months.	Groundwater quality monitoring report (Intertek) dated 20.11.2020
17.		Monitor surface water quality, on a three-month basis, according to the parameters defined in Table 9 of the EMP.					There is a Surface Water Quality Monitoring Plan in place and monitoring is carried out every three months.	Surface water quality monitoring report (Intertek) dated 11.12.2020
18.		Monitor water from the Effluent Treatment Plant (ETE) on a monthly basis. (Domestic, workshop and service stations ETE), according to the effluent parameters defined in Table 10 for domestic wastewater emissions and Table 11 for workshop and service stations.					There is a Monitoring Plan in place to monitor the water from the ETE on a three-month basis.	Monthly monitoring report of the STP water (Intertek) dated 16.11.2020 Water/oil separator monitoring report (Intertek) dated 16.11.2020
19.	**Air Quality Management Program**	Moisten unpaved roads in the project area, especially those that are used frequently by project equipment and vehicles and all other locations identified as high risk for fugitive dust emission.					Water trucks are used to minimize dust.	Visual observation
20.		Preserve the vegetation between the project's operational area and the nearest communities to serve as a buffer zone.					There is a "conservation area" around the mine to act as a curtain. Revegetation campaigns are carried out.	Visual observation
21.		Adequate preventive maintenance of the vehicle and equipment fleet according to the recommendations of the manufacturers in order to avoid excessive emission of particulates (smoke) and pollutants.					Maintenance is done regularly. There is a maintenance plan in place and the vehicle fleet follows this plan.	Online registration of the maintenance plan and vehicles and equipment maintenance report

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
22.		Limit the speed of vehicles and equipment in the project area to minimize the emission of particulates on the roads.					Speed limit outside operational areas is 40km/h. Inside the mine and operational areas limit is 10 or 20km/h. Inside localities the limit is 30km/h. Speed limit control is done within the concession area and on the road between the plant and the camp.	Visual observation
23.		Recovery of vegetation cover of exposed areas already mined, slopes of the tailings dam, slopes of mine waste deposits as soon as possible.					In some concession areas revegetation is underway in places that have been subject to uncontrolled burning. Recovery of vegetation cover of exposed areas already mined has not yet begun, as there are no exposed areas that have already been mined.	Visual observation
24.		Choose clean technologies to reduce gas and particulate emissions and use wet processing technology as an option for dust control.					The control of dust emission is achieved by keeping roads moist. There has been a decrease in the emission of gases from the incinerator, because some of the waste, such as plastic bottles, is now being recycled instead of incinerated.	Visual observation
25.		Ensure that in the existing incinerator only waste is incinerated according to the technical specifications of the incinerator, and avoid incinerating hazardous waste.					Water bottles are recycled. Hazardous waste is managed by Moz Environmental and is never disposed of in the incinerator.	Safe disposal certificates (MozEnvironmental), dated 25.08.2020
26.		Strictly follow the maintenance plan for the incinerator according to the manufacturer's recommendations.					Regular maintenance of the incinerator is carried out according to the maintenance plan.	Online registration of the maintenance plan and incinerator maintenance report
27.		Ensure that the height of the piles in the ore storage area (RoM), piles of sterile material as well as topsoil are not too high to the point that they are exposed to risks of wind erosion and create dispersion of large dust.					In the RoM, the front end loader carries material up to a maximum of 6m. As such, the piles of the RoM should have a maximum height of 6m. A topographic survey of the piles is done weekly and/or monthly (weekly for the RoM and monthly for the other piles).	Detailed design study. Snowden Group. August 2015 Stockpile Report. Snowden, March 2020 Monthly plan: Waste Rock Dump Heights Diagram

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
28.		Inventory of the sources of fugitive emissions of particulates and gases throughout the enterprise and assessment of the respective risk. Keep the inventory up to date.					Risks related to fugitive emissions are dealt with in the risk register.	Risk register 23.10.2020
29.		Progressive rehabilitation of the dry tailings deposition area as soon as it reaches the maximum expected height, without necessarily waiting for the landfill to be completely full.					The dry waste disposal area is a new project and has not yet been implemented. Therefore, at the time of this audit, this requirement was not applicable.	
30.		Ensure that the transport and dry deposition of tailings is carried out while the tailings have moisture to avoid emitting dust.					The dry waste disposal area is a new project and has not yet been implemented. Therefore, at the time of this audit, this requirement was not applicable.	
31.		Choose low sulfur fuels available on the local market to supply project equipment.					The most commonly used fuel in the plant is 50 ppm diesel, as there is no alternative. There is no low sulphur fuel in the local market.	Certificate of fuel quality
32.		Use of refrigerant gases free of substances that deplete the ozone layer, and gradually abandon the use of R22 refrigerant and start using alternative refrigerants, as established in the Vienna Convention and respective amendments.					R22 is not used in any of the plant areas. The gases used are R410, R404, R407, 134A.	Gas MSDS
33.		Establish an air quality monitoring network and install a weather station in the project area.					There is an internal procedure in place for Air Quality Management. PM_{10} and $PM_{2.5}$, dust deposition and greenhouse gases are monitored. There is a meteorological station in the project area.	Air Quality Management Procedure dated 22 October 2020 BAL-PR-EN-0008 Revision 1
34.		Give priority to the implantation of the monitoring points, mainly in places with					Currently, there are 4 monitoring points in Ntete, Maputo, Pirira and Nquide (surrounding communities).	Air Quality Management Procedure dated 22 October 2020 BAL-PR-EN-0008 Revision 1

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
		sensitive receivers such as the surrounding communities for example.						
35.		Monitor air quality according to the monitoring plan presented in this EMP.					The air quality management procedure has been updated to include the current monitoring plan.	Air Quality Management Procedure dated 22 October 2020 BAL-PR-EN-0008 Revision 1
36.		Monitor air quality in compliance with the frequency and parameters set out in Table 13 of the EMP.					The air quality management procedure has been updated to include the current monitoring plan.	Air Quality Management Procedure dated 22 October 2020 BAL-PR-EN-0008 Revision 1
37.		Ambient Air Quality Monitoring Standards/limits must be in accordance with Table 14 of the EMP.					The monitoring reports show that the values are within the established limits.	Air quality monitoring report. TrackPro report dated 21.11.2020
38.		Parameters/limits of precipitation/ deposition of particulates for the project must be in accordance with Table 15 of the EMP.					The monitoring reports show that the values are within the established limits.	Air quality monitoring report. TrackPro report dated 21.11.2020
39.		Maximum Allowable Emissions of Air Pollutants Emissions - Mobile Sources or Motor Vehicles must be in accordance with Table 15 of the EMP.					Monthly report showing the estimated gas emissions based on the fuel consumption values.	Monthly sustainability report, November 2020.
40.	**Noise and Vibration Management Program**	Ensure periodic maintenance of equipment / machinery that causes the emission of noise and use silencers where necessary.					All equipment is subject to periodic maintenance, as well as surveys and inspections.	Online registration of the maintenance plan and vehicles and equipment maintenance report
41.		Whenever possible, avoid carrying out activities that are noisy or create vibrations at night.					Non-stop activities during plant operation. Workers exposed to occupational noise use PPE. Camp generators are enclosed in order to minimise noise emission.	Visual observation
42.		Establish noise barriers or curtains in case noisy operations are affecting neighboring areas.					Conservation areas along the perimeter of the concession area act as acoustic curtains.	Visual observation

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
43.		Location of sources that generate noise away from sensitive receivers, such as residential or other, in order to comply with permissible emission levels.					The location of the plant is quite distant from the camp and surrounding villages. The acoustic monitoring results show there are no noise impacts on the communities as a result of the activities.	Noise monitoring report (Cirrus research plc) dated 28.11.2020 for the towns of Ntete, Maputo, Pirira and Nquide
44.		Map and signal operational areas with high noise levels (above 85 dBA).					Signs indicating the mandatory use of hearing protection equipment in all operational areas where noise levels are high.	Visual observation (Photo)
45.		Blasting activity is carried out taking into account the aspects of noise and vibration propagation.					Blasting activities comply with the monthly blasting plan, however this is not a frequent activity. Communities and workers are duly informed of all blasting activities. Measurement of noise and vibration emissions during blasting activities in the communities of Pirira and Maputo.	Blasting Management Plan. BAL-PL-EN-0002_1. Rev 1 dated 17 October 2020
46.		Whenever possible, ensure that blasting is carried out during the day.					All blasting activities occur during daytime only.	Blasting Management Plan. BAL-PL-EN-0002_1. Rev 1 dated 17 October 2020
47.		Notification/ communication of surrounding communities about the blasting program, in order to minimize the surprise effect.					At the entrance of the mine there is a board with specific information about all blasting activities. This board has precise information about the date and time of the blasting. The Communication Department is responsible for internal communication, as well as communication with the communities, and this information is also broadcasted on the radio.	Blasting Management Plan. BAL-PL-EN-0002_1. Rev 1 dated 17 October 2020
48.		Define exclusion areas for the safety of people and animals for each blasting event and ensure the signaling and control of movement of people in these areas.					No one is allowed to walk in the vicinity of the blasting site during this activity. Blasting usually occurs during periods of low activity to ensure there is no activity taking place in the vicinity. Distances have been defined for equipment (200m from the blasting source) and for people (500m from the blasting source).	Blasting Management Plan. BAL-PL-EN-0002_1. Rev 1 dated 17 October 2020

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
49.		A maximum of two blasts are allowed per day. There can only be more than 2 blasts per day in exceptional cases.					The blasting management plan establishes a maximum of two blasts per day, except in special situations involving technical issues and the material to be blasted.	Blasting Management Plan. BAL-PL-EN-0002_1. Rev 1 dated 17 October 2020
50.		Develop a detailed plan for each blasting event to maximize its efficiency and minimize the emission of fumes and dust, vibration, and rock projection.					This plan applies to each blasting.	Blast Procedure Presentation
51.		Monitor ambient noise levels on a monthly basis in the communities nearest to the mining activities according to the Points presented in Table 18 of the EMP.					Monitoring is carried out monthly at all points established in the EMP.	Noise monitoring report (Cirrus research plc) dated 28.11.2020 for the towns of Ntete, Maputo, Pirira and Nquide
52.		Ambient noise emission standards must be within the levels shown in Table 19 of the EMP.					Levels are within limits.	Noise monitoring report (Cirrus research plc) dated 28.11.2020 for the towns of Ntete, Maputo, Pirira and Nquide
53.		Noise and vibration monitoring must be carried out during blasting activities.					Noise and vibration levels are provided for in the blasting plan. However this year no noise and vibration levels were measured as there was no blasting activity.	Noise and vibration monitoring reports: Pirira blasting monitoring dated 20.07.2019
54.		Noise and vibration monitoring during blasting activities must be carried out according to the paragraphs indicated in Table 20.					This year noise and vibration levels related to blasting were not measured as there was no blasting activity.	
55.		Vibration Parameters during blasting activities must be in accordance with the values shown in Table 21.					This year noise and vibration levels related to blasting were not measured as there was no blasting activity.	
56.		Blasting activities must be carried out taking into account the aspects related to noise and vibration propagation.					The conditions required to minimise the propagation of noise and vibration are taken into account while drafting the blasting plan.	Blast Procedure Presentation

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
57.	**Waste Management Program**	Carry out the waste inventory and classify it (according to Decree 94/2014, of 31 December - Urban Solid Waste Management Regulation) and indicate the appropriate final destination for each type of waste.					There is a waste management procedure which contains a list of waste and its classification. Classification is based on segregation and on the national regulation on waste.	Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020
58.		Identify and implement alternatives to reduce or eliminate waste production.					The Management Plan refers to waste that can be recycled and reused, such as wood (reused by local institutions for fuel), metal (sold to a company that reuses it), cooking oil (reused for making soap), rubber tyres (reused by the Agricultural Institute for slope stabilization). Water bottles are reused by an NGO in Pemba to build houses.	Report or protocol on delivery of material for recycling
59.		Provide containers of an appropriate size for the disposal and handling of waste.					There are appropriate containers for waste disposal thorughout the entire plant and camp area. These are placed in appropriate locations.	Visual observation
60.		Containers must be properly identified and must ensure adequate conditions of tightness and hygiene.					Containers have different colours according to the waste that is to be disposed of, as specified in the internal waste management procedure (Annex 2). Currently, due to the unavailability of some colours of containers, the labels for each type of waste have a specific colour and this must be the colour followed during segregation.	BAL-ST-EN-0001- Waste labels standard Visual observation
61.		The points for locating the waste collection containers must be positioned at least 100 meters away from the storm drain lines and rivers.					All waste collection points or container locations are positioned at a safe distance from the storm drain lines. Note that there is no river in the concession area.	Visual observation
62.		Waste containers must be clearly identified and waste must be segregated.					See sections 57 and 60 above.	BAL-ST-EN-0001- Waste labels standard Visual observation

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
63.		The waste produced should be removed frequently to an appropriate location using a means of transport appropriate to the type of waste.					MozEnvironmental collects general waste that cannot be incinerated on site, such as cardboard boxes, cement bags, etc. The final destination of the waste is either the incinerator or the dump in Pemba. Transport is carried out in appropriate vehicles. Waste is collected according to demand. If the incinerator is unable to meet the demand, MozEnvironmental takes the waste to Pemba.	MozEnvironmental Waste Manifest Certificate, dated 25.11.2020
64.		Only the types of waste prescribed in the incinerator specifications should be incinerated in the existing incinerator.					The waste management procedure has a section about the operation and management of the incinerator. In order to ensure the efficiency of the incinerator, only suitable waste is incinerated in accordance with the incinerator standard operating procedure.	Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020 Incinerator Standard Operating Procedure BAL-SOP-RL-0001 Rev1, dated 04 September 2020
65.		The ash generated in the incinerator must be deposited in the existing landfill.					The landfill is the final destination of the ashes from the incinerator.	Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020 Incinerator Standard Operating Procedure BAL-SOP-RL-0001 Rev1, dated 04 September 2020 Landfill Management Procedure BAL-PR-EM _0007 Rev 0, dated 5 December 2017.
66.		Hazardous waste must be segregated according to the classification contained in Annex III and IX of Decree No. 83/2014, with the proponent or the entity handling the same having at least the technical conditions for packaging the waste in their possession.					The Waste Management Plan identifies hazardous waste in accordance with its classification. Hazardous waste is segregated as appropriate and separated from other waste. Moz-Environmental collects the hazardous waste and provides safe disposal certificates.	Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020 Safe disposal certificates (MozEnvironmental) dated 25.08.2020

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
67.		Hazardous waste must be packaged or packed according to technical standards to be established by specific instructions on the packaging of hazardous waste.					There is an appropriate location for the disposal of hazardous waste (waste contaminated with hydrocarbons, grease and oils, and corresponding containers). When this site is full, MozEnvironmental collects the waste. There is a container at Total for used oils with a capacity of 30 thousand litres. When this container is full, Refinery Oasis is called to collect it. This company also provides safe disposal certificates.	Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020 Safe disposal certificates (MozEnvironmental) dated 25.08.2020
68.		The containers must be properly identified and include the symbols defined in Decree nº 83/2014.					There are several containers at the site where hazardous waste is stored and where waste is segregated. However, there is no proper designation of the waste that is inside each container.	Visual observation
69.		The points for locating the waste collection containers must be positioned at least 100 meters away from the storm drain lines and rivers.					The hazardous waste storage site is a safe distance away from any drainage lines.	Visual observation
70.		Provide the waste management team with the necessary occupational safety equipment for handling hazardous waste.					The maintenance team and the environment team are responsible for the management of the waste store, allowing access to those who need to store specific hazardous waste. The use of appropriate PPE is compulsory when handling this type of waste. The waste management procedure should include the appropriate PPE when handling hazardous waste.	Visual observation
71.		Hazardous waste must have a place for temporary storage. This place must have adequate conditions for the storage of these residues to avoid contamination of the soil and water, the place must have cover, waterproofed					There is a place for the temporary storage of hazardous waste. The site is properly fenced, aired and the floor is waterproof. Liquid hazardous waste such as grease is stored inside detention ponds.	Visual observation

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
		floor, duly signposted and with restricted access.						
72.		The handling and storage of hazardous substances must be done in accordance with the applicable requirements of Decree nº 83/2014.					The waste management procedure includes specific measures for the handling and storage of hazardous waste.	Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020
73.		The transport of hazardous waste within Twigg's facilities to the storage location must be carried out using appropriate equipment and vehicles capable of containing it (these must allow for proper washing and disinfection).					The workers who transport the waste to the storage site have adequate PPE such as gloves. Transport is done manually, in closed containers, from the department where it is produced to the storage site. Hazardous waste produced at the camp is properly secured before being transported in pick-up trucks to the hazardous waste storage site.	Visual observation Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020
74.		The transport of hazardous waste outside TWIGG's facilities can only be carried out by an entity licensed by MITADER and must obey the basic rules and procedures established in the applicable legislation.					Transport of hazardous waste outside Twigg premises is carried out by MozEnvironmental which is duly registered with the MTA.	MozEnvironemntal Environmental License
75.		When collecting hazardous waste, a manifest must be completed, in quadruplicate, mentioning the quantities, quality and destination of the collected waste (according to Annex VI of Decree No. 83/2014), of which a copy must be kept by the entity waste generator, another copy by the waste carrier, the third copy to be kept by the recipient of the product and the fourth sent to MITADER.					Manifests are duly filled in.	MozEnvironmental Waste Manifest Certificate, dated 25.11.2020

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
76.		Raising workers' awareness of the need to reduce waste production, and promoting the use of reusable products.					Awareness-raising campaigns are carried out regularly. Environmental, health and safety issues are discussed on a weekly basis.	WIS – Weekly Information Sharing. Week 13-18 July, Focus: Proper waste management
77.		Training of workers for the classification, correct segregation, handling and transportation of waste.					New workers go through general induction and waste management issues are addressed during recycling inductions.	Attendance list of training course on effective management and disposal of waste, dated 21.02.2020 Attendance list of training course on waste management, dated 26.07.2020
78.		Sensitizing workers to the use of personal protective equipment necessary for handling hazardous waste.					There is no specific team for hazardous waste management. However, everyone is aware that the use of PPE is a key requirement when handling hazardous waste (induction addresses PPE issues, as well as awareness raising).	Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020 Attendance list of training course on chemicals and hazardous chemicals, dated 14.10.2019 Attendance list of training course on effective management and disposal of waste, dated 21.02.2020 Attendance list of training course on waste management, dated 26.07.2020
79.	**Waste Management Program** - Tailings and rock waste management	Regularly inspect the integrity of the tailings dam and the waste dump by technically qualified persons.					TSF management has a maintenance and inspection plan. Inspections are done on a daily or weekly basis. The consultants who provided support during the construction of the tailings dam also provided initial training to Twigg staff. New workers undergo regular training.	Emergency Response Plan for the TSF BAL-PL-EM-0068 Rev0, dated 16 October 2020 Environmental Safety Plan for the tailings dam GNS.PSA001/19, dated October 2019 Maintenance and inspection plan for the TSF
80.		The waste dump and the tailings dam must be located in a place where, in the event of its closure, soil and water					The tailings dam is waterproofed and regular monitoring is conducted to assess pollution issues.	TSF inspection form, dated 12.11.2020

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
		pollution as well as physical risk to communities is minimized.					The nearest community is Ntete, however it is at a safe distance (8km) in the event of closure.	
81.		The choice of sterile material storage locations should have minimal impacts on vegetation, soils and water resources.					The impacts arising from the waste rock dump are addressed in the waste and effluent assessment report.	Waste and Effluent Assessment Report. CES, December 2015
82.		Establishment of the tailings dam safety plan in accordance with Decree 50/2017 of 31 October.					The Environmental Safety Plan for the tailings dam was also drawn up within the scope of the EMP review. There is also an internal procedure: the TSF Emergency Response Plan.	Emergency Response Plan for the TSF BAL-PL-EM-0068 Rev0, dated 16 October 2020 Environmental Safety Plan for the tailings dam GNS.PSA001/19, dated October 2019
83.		Ensure that the sterile and mineralized material with the potential to form acidic drainage is encapsulated by non-acid-forming mining waste.					The acid drainage management procedure provides guidance for the adequate storage of material with the potential for acid drainage.	Acid drainage management procedure BAL-PR-EN_0010 Rev 0, dated 5 December 2017
84.	**Waste Management Program** - Monitoring and/or Verification Action	Record the volumes of solid urban waste, hazardous waste and those resulting from the mining process generated in the project.					There is a database on waste generated.	Sustainability Report, November 2020
85.		Record the volumes of urban and hazardous solid waste deposited in the landfill, recycled, reused, incinerated and stored.					There is a database on waste generated and final destination. A brief report containing the type of waste generated and the method of disposal is produced monthly.	Monthly Sustainability Report, November 2020
86.		Carry out periodic visual inspection of the places where the waste collection containers are placed, to check the adequacy of the existing containers to the volume of waste produced, the correct segregation and packaging of					Weekly visual inspections are carried out, and more detailed inspections are carried out once a month. During the inspections the listed issues are taken care of.	Environmental inspection reports, dated 20.03.2020

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
		the waste and the existence of spills and contamination.						
87.		Ensuring that workers undergo an environmental induction where waste management is addressed, among other topics.					New workers go through general induction and waste management issues are addressed during recycling inductions.	Induction presentation - Environmental Management Twigg, 2017
88.	**Ecology Management Program - FAUNA**	Protect the local fauna and flora and establish programs for the recovery and rehabilitation of areas disturbed by the project's activities.					A nursery has been provided. Revegetation campaigns are carried out at the beginning of each year. The 2020 campaign covered an area of approximately 5 hectares. During this last revegetation campaign, around 6838 seedlings of native species were planted.	Visual observation Semi-annual report on environmental and social performance from January to June 2020
89.		Prohibition of hunting or harassment of animals within the concession area.					The hunting ban is announced. This is addressed at induction and at weekly information sharing sessions.	Weekly information sharing. Week of 23 - 29 March. Focus: International Day of Forests
90.		When building roads, where possible, incorporate underground passages and manholes to allow animals to move in order to avoid being run over.					There is hardly any no record of animals being run over. The roads include underground passages and manholes.	Visual observation
91.		Monitor the fauna according to the established monitoring plan.					Fauna monitoring should be carried out every 5 years. This year no monitoring was planned.	
92.		Ensure that deforestation of mining areas or other related activities is carried out only when necessary to allow habitat availability to local fauna.					An internal procedure for deforestation has been established.	Procedure for deforestation BAL-PR-EN-0015 Rev 0, dated 24 November 2019
93.		Protect abiotic habitats, such as rocky outcrops, which are home to many species of small mammals.					These habitats are protected under the Conservation Area projects.	Conservation Area and Sustainable Livelihood Procedures BAL-PR-EN-009 Rev1, dated 22 October 2020
94.	**Ecology Management**	Establish a conservation area within the concession area in order to preserve the					A conservation area has been established along the concession boundary which meets the overall	Conservation Area and Sustainable Livelihood Procedures BAL-PR-EN-009 Rev1, dated 22 October 2020

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
	Program - FLORA	local vegetation and provide a refuge area for local fauna.					objective. There are also procedures in place for sustainable livelihoods and conservation area.	
95.		Prohibit the introduction of flora species that are invasive or exotic without prior environmental assessment and necessary authorization in accordance with current legislation.					An internal procedure concerning invasive plants has been established.	Invasive plant management procedure TWG-PR-EN-0004 rev0, dated 15 December 2017
96.		Compile a detailed inventory of existing flora within the concession area.					There is a flora inventory included in the Environmental Impact Assessment.	Terrestrial Faunal Impact Asessment. CES, December 2013
97.	**Ecology Management Program – AQUATIC ECOLOGY**	Prevent contaminated water from processing facilities from reaching watercourses and drains by implementing environmental control systems such as tailings dam, domestic effluent treatment plant and other necessary measures.					All these systems are fully implemented in the plant. There are two STPs, tailings dam, mini-dams (return and settling water).	Visual observation
98.		Mine water and runoff from mining areas and the processing plant will be retained in sedimentation ponds.					All surface run-off water is directed to the settling pond.	Visual observation
99.		Ecological Monitoring must be conducted in accordance with the parameters and frequency shown in Table 26.					Due to the Covid 19 pandemic, it has not been possible to comply with the ecological monitoring plan this year. However, monitoring is conducted in accordance to specific parameters and frequency.	Previous reports. Monitoring reports of flora and fauna from the conservation areas in Balama, Cabo Delgado, March 2019, UEM

Table 3 Compliance with socioeconomic, health and safety requirements

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
100.	**Recruitment and Training Program**	Promote the public disclosure of the vacancies offered, indicating the location for registration of workers, number of vacancies, function and assignments, taking into account the time necessary for submission to the training of those selected.					TWIGG has a recruitment procedure that outlines the steps necessary to recruit employees.	Recruitment, Human Resources and Training Procedure. TWG-PR-HR-0004_2_Pt. Dated 20 May 2020
101.		Whenever possible, use local agencies and channels to disseminate information on permanent or seasonal vacancies, including the use of local leaders.					Initially, all Balama Graffiti Project vacancies were advertised on local radio (Notícias Radio), on the Twigg information board (at the District Administration), as well as specific recruitment posts. However, it became clear that using the local radio station to advertise job opportunities created too many expectations among people, encouraging a large number of applicants from different parts of the district and elsewhere to flock to Twigg offices in search of job opportunities. This prompted TWIGG to hire a service provider to recruit workers for the company, but always in accordance with TWIGG recruitment policy.	Interview with the HR Superintendent
102.		Prioritize the local workforce whenever possible, especially in positions that do not require specialized skills.					Although the workforce recruitment services have been outsourced, priority continues to be given to the recruitment of local workforce.	Interview with the HR Superintendent
103.		Manage job expectations to mitigate immigration in the project area by providing accurate information on available vacancies and the qualifications of personnel required.					Expectations can be managed more effectively by having a recruitment company handle all recruitment and selection matters.	Interview with the HR Superintendent

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
104.		Create a database with local staff of working age and their skills or technical skills useful for project activities.					Although the recruitment process is outsourced, the social team has a database of jobseekers from neighbouring communities, which is updated and shared with the recruitment company whenever necessary.	Interview with the Community Relations Superintendent
105.		The training and technical qualification of new employees in the workplace will be through informative and demonstrative lectures on the tasks that the workers will perform and continuous training in the workplace.					Every employee/worker who joins TWIGG staff first undergoes induction and then technical training. The Health and Safety Management Plan specifies that all employees and contractors must be adequately trained and have the necessary skills to ensure they are aware of their responsibilities regarding health and safety, and workplace hazards, and that they are able to identify and implement controls to perform their tasks in a safe manner. This plan also specifies that the worker/employee or subcontractor must first undergo induction training before the real work can begin.	Interview with the Community Relations Superintendent Health and Safety Management Plan. TWG-PL-SA-0001, Revision 4. Dated 18 January 2019.
106.		Establish partnerships with professional training institutions for the training of staff, oriented to the needs of the project whenever possible.					TWIGG established partnerships with a number of specialized organizations to provide professional training according to the needs of the project, such as handling radioactive materials, firefighting, among others. On the other hand, workers are trained "in house" whenever necessary. Accordingly, in the first semester, Twigg registered 4510 hours of training and the attendance of more than 1915 participants in the main courses related to Business Conduct, Critical Risk Management, General Induction, Occupational Exposures,	Interview with the Community Relations Superintendent Semi-annual Environmental and Social Performance Report, January to June 2020 TWG-RP-ES-0001_0_pt, dated 15 July 2020 Firefighting training certificate issued by the National Services

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
							Hazard and Risk Management, Fatigue Management, Human Rights and Leadership in the field.	of Public Safety on 6 January 2020
107.		Monitoring of the expected results of this plan should be carried out twice a year and should be achieved through the use of questionnaires, among other indicators, such as: • Estimated hours of work (internship, training and per employee); • Number of workers recruited monthly; • Percentage of local employees in relation to the total number of workers; • Vacancy announcements published locally per year; • Partnerships established with professional training centres.					TWIGG monitors the results of the recruitment program and these results are provided in the Semi-annual Environmental and Social Performance Report. According to this report, in the first half of the year, Twigg recorded 4510 hours of training and the attendance of more than 1915 participants in the main courses.	Semi-annual Environmental and Social Performance Report, January to June 2020 TWG-RP-ES-0001_0_pt, dated 15 July 2020
108.	**Environmental Education Program**	Induction of new workers immediately after they become part of TWIGG staff and promotion of dialogues on environmental issues throughout the course of the work.					Anyone entering the premises of the Balama Graphite Mine must undergo an induction session. The content of the induction depends on the location that is to be visited. New workers/employees undergo comprehensive induction which covers health, safety and environmental issues.	Interview with the HR Superintendent Powerpoint presentation of an induction session V.2, 2017
109.		Educational messages on environmental issues that bring relevant themes to the workplace and the community in general, raising environmental awareness.					Information and education sessions on environmental issues have not taken place only during meetings. Alternatives to avoid the concentration of workers in a single room, so	Interview with the HR Superintendent

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
							as to reduce the spread of Covid 19, are pamphlets, magazines and newspapers.	
110.		Assistance in the training of primary education and adult literacy teachers on environmental education, management practices and sustainable development.					Due to the constraints caused by the Covid-19 pandemic, it was not possible to implement live training programmes, because schools were either closed or had restricted access.	Interview with the Community Relations Superintendent
111.		Encouraging the involvement of traditional leaders, teenagers, cultural groups, community associations, religious organizations and NGOs in facilitating public participation and environmental awareness.					Due to the constraints caused by the Covid-19 pandemic, it has not been possible to implement environmental awareness activities involving traditional leaders, teenagers, cultural groups, community associations, religious organizations and NGOs.	Interview with the Community Relations Superintendent
112.		Support for the inclusion of content on environmental education in the workforce training program, with an emphasis on the importance of preserving the environment.					All those working for TWIGG undergo the following training phases: induction, specific training and refresher training. All these phases address issues regarding the importance of preserving the environment. Issues related to environmental education and the importance of preserving the environment are not only conveyed to the workers during training sessions, but also in leaflets, newspapers and posters.	Interview with the HR Superintendent Powerpoint presentation of an induction session V.2, 2017 TheGraphitizer – TWIGG Communication, Issue 53 - 7 April 2020
113.		Celebration of certain dates, such as 5 June (World Environment Day), to promote environmental well-being, thus allowing interaction between company and community.					Important dates related to environmental well-being have not gone unnoticed at the Balama Graphite Mine. This year, due to the restrictions mentioned above, these dates were not celebrated as usual. On 21 May, International Day of Forests, TWIGG published	Weekly information sharing. Week 13: 23 - 29 March 2020

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
							information on forests and local biodiversity via its Weekly Information Sharing protocol.	
114.		Monitoring of the expected results of this plan should be carried out annually. The main indicators will be: the number of environmental incidents registered in the project and the number of events related to environmental education carried out in partnership with the company in the surrounding communities and at the District level.					TWIGG has been monitoring the results of the Environmental Education Program every six months. Theres results are then published in the sustainability report. However, this year, due to Covid-19 Pandemic Constraints, it was not possible to implement environmental education activities in the surrounding communities and at District level.	Interview with the Community Relations Superintendent Semi-annual Environmental and Social Performance Report, January to June 2020 TWG-RP-ES-0001_0_pt, dated 15 July 2020
115.	**Program for the Promotion of Local Development**	Develop the investment plan that will be negotiated between the company, the local government and the affected community.					A community development agreement was signed in 2017 between TWIGG, Balama District Government and local Communities to promote development in the mining concession area to improve the well-being of the surrounding populations. However, there is no investment plan.	Community Development Agreement signed by TWIGG, Balama District Government and the Communities in May 2017
116.		The provincial government of Cabo Delgado and/or of the district of Balama will be responsible for approving the agreement and for ensuring that the negotiations are fair and follow the procedures defined in the guide.					The community development agreement was also signed by the Balama District Government in 2017 and, as such, one can conclude that the District Government has approved the agreement.	Community Development Agreement signed by TWIGG, Balama District Government and the Communities in May 2017
117.		The plan will be established in writing, in the form of a Memorandum of Understanding or Local Development Agreement (*ADL*) and will be signed by the main stakeholders, namely the Provincial Government or District Administrator,					The community development agreement was signed by TWIGG, the Balama District Government and local communities in 2017, but the Provincial Government was not involved. However, there is a recommendation in this regard in the EMP which was drafted	Community Development Agreement signed by TWIGG, Balama District Government and the Communities in May 2017

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
		Twigg as the concessionaire and the representative(s) of the target community(ies).					subsequent to the signing of the agreement. Nevertheless, clause nine of the agreement provides for a review of the agreement every 5 calendar years, so there is room to include the Provincial Government in the next review of the agreement.	
118.		The representative(s) of the covered Community(ies) are elected during a community meeting and recognized by the District Administrator.					The task of selecting Community representatives is a process which is not within the remit of TWIGG.	
119.		MIREME and MITADER are the ministries that endorse the proposal for designation of the affected communities.					The process of identifying the communities covered by the project began during the Environmental Impact Assessment phase. During this phase, MIREME and MITADER, by approving the EIA Report, agreed on the identification of the affected communities.	
120.		The identification of affected communities is updated every 5 years, or sooner if circumstances so dictate.					The agreement was last revised in 2017 and there was no need to remove and/or add new communities.	Community Development Agreement signed by TWIGG, Balama District Government and the Local Community. Not dated. Interview with the Community Relations Superintendent
121.		The Local Development Agreement and Memorandum of Understanding are only negotiated and signed after the communities concerned are duly identified and approved.					The community development agreement was negotiated and approved after the completion of the studies and the due identification of the communities.	Environmental, Social and health Impact Assessment for the proposed Balama Graphite Mine in the Cabo Delgado Province in the District of

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
								Balama in Northern Mozambique, February 2015
122.		The social investment amount is established by way of a contract, concession agreement or memorandum of understanding signed between the Ministry responsible for overseeing the Mineral Resources and the rightholders or concessionaires, as provided for in the Mining Law and the Petroleum Law, or by way of local development agreements and memorandums of understanding entered into between the Provincial Government or District Government and the company.					The investment amount was not only set out in the memorandum of understanding, but also in the Mining Contract.	Community Development Agreement signed by TWIGG, Balama District Government and the Communities in May 2017 Interview with the Community Relations Superintendent
123.	**Cultural Aspects Management Plan**	Increase the degree of awareness of the various segments that make up the workforce with respect to the importance of actions to preserve the historical and cultural heritage.					During induction training, the importance of actions to preserve the historical and cultural heritage is also highlighted.	Interview with the HR Superintendent Powerpoint presentation of an induction session V.2, 2017
124.		The dissemination of elementary notions about the regional historical and cultural context and about the importance of being preserved.					In addition to induction training, cultural heritage preservation messages are also conveyed to workers via pamphlets and newspapers. Some sites that are classified as historical heritage are marked with appropriate signs.	Interview with the Community Relations Superintendent Visual observation
125.		Dissemination of information to workers involved in the mine on the importance of preserving the cultural and natural heritage there, as well as on the means that will be					Information sessions were held for workers on the importance of preserving cultural and natural heritage. On the other hand, archaeologists have not identified any archaeological site in the project area.	Environmental, Social and health Impact Assessment for the proposed Balama Graphite Mine in the Cabo Delgado Province in the District of

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
		applied by archaeological prospecting and rescue, if applicable.					However, some of Twigg workers have received training on how to identify an archaeological site.	Balama in Northern Mozambique, February 2015 Interview with the Community Relations Superintendent
126.	**Safety and Security**	Vehicle drivers must obey the speed limits.					All drivers first undergo general induction, then training on company standards and procedures and finally training in defensive driving.	
127.		Details of accidents will be documented in the Emergency Response and Management Plan.					All accidents are documented in an accident report drawn up by a qualified team working for TWIGG.	Interview with the Health and Safety Superintendent Offsite Road Traffic Accident. Date: 01/092019
128.		Security staff will receive adequate training on the use of force and appropriate conduct.					ChelsiaGroup has been hired to provide security services in the mine area. An updated procedure defines the basic principles on the use of force and specifies training requirements.	Procedure on the Use of Force, (CGM/SOP), dated June 2019
129.		A code of conduct for security personnel will be prepared, in line with the UN Code of Conduct for Law Enforcement Officials.					There is a code of conduct for security personnel, in line with the UN Code of Conduct for Law Enforcement Officials.	Code of Professional Ethics
130.		Trucks with abnormal loads will be escorted by at least two vehicles (one in front and one behind).					Transport of abnormal loads is outsourced. Subcontractors are required to obtain licences under Article 58 of the Road Traffic Code. Provisions require police escort.	Road Traffic Code, Decree No. 1/2011 of 23 March

No.	Reference (in EMP)	Requirement	C	NC	PC	INC/ NA	Audit Finding	Evidence
131.	**Health**	Workers/employees shall be subject to periodic medical examinations as part of occupational health and safety, taking into account exposure to risks.					Pre-employment, annual and post-employment medical assessments are carried out for all employees taking into account exposure to risks. The same procedure is used for malaria control and to prevent the spread of Covid-19: all workers/employees must be tested for malaria upon arrival or when leaving the plant. In addition, all workers must be tested for Covid-19, placed under quarantine for the specified number of days and comply with the measures defined to prevent the spread of Covid-19.	

4 Conclusions and Recommendations

The Balama Graphite Mine has been in operation since 2018. During this period, Twigg has been implementing several social projects, not only to comply with the requirements and recommendations of the Environmental Management Plan and/or Resettlement Plan, but also as part of its Social Responsibility.

The audit findings show that TWIGG has a high level of commitment in environmental and social awareness. General housekeeping both at plant site and camp site was highly improved from previous audits.

A total of 142 criteria were audited against compliance (99 biophysical, 32 social and 11 related to the requirements set out by the MTA in the updated EMP approval letter).

Regarding biophysical aspects, 99 elements were audited, divided into 5 different categories. The results are summarized below.

	Category	Criteria	Compliant	Non compliant	Partially compliant	Not applicable
Biophysical	Water Resources Management Program	18	17	0	1	0
	Air Quality Management Program	21	19	0	0	2
	Noise and Vibration Management Program	17	15	0	0	2
	Waste Management Program	31	30	0	1	0
	Ecology Management Program	12	11	0	0	1
	TOTAL	99	92	0	2	5

The assessment carried out during the audit revealed zero non-compliances, two partial compliances and five criteria were found to be not applicable.

The partial compliances are related to:

- Hydrogeological model of the mine: A gap analysis was conducted in March 2020 in order to proceed with the development of the model. However, due to travel and site access restrictions imposed by the Covid-19 pandemic, the work cannot be completed in 2020, so its completion is scheduled for 2021.

- Hazardous waste - containers with hazardous waste must be properly identified and include the symbols defined in Decree No. 83/2014. There are several containers at the site where hazardous waste is stored and where waste is segregated. However, there is no proper designation of the waste that is inside each container.

The non-applicable requirements relate to:

- Dry tailings deposition: Progressive rehabilitation of the dry tailings deposition area as soon as it reaches the maximum expected height, without necessarily waiting for the landfill to be completely full. The transport and dry deposition of tailings is carried out while the tailings have moisture to avoid emitting dust. The dry waste disposal area is a new project and has not yet been implemented. Therefore, at the time of this audit, this requirement was not applicable.
- Noise and vibration monitoring during blasting activities must be carried out according to the paragraphs indicated in Table 20 and vibration parameters must be in accordance with the values shown in Table 21. No blasting events occurred in 2020; and
- Fauna monitoring in line with the established monitoring plan: the plan stipulates that monitoring should take place every 5 years and no need for monitoring in 2020.

Regarding socioeconomic aspects, 32 elements were audited, divided into 6 different categories. Note that the health and safety category is consistent with the previous EMP, as the updated EMP does not address these issues. The results are summarized below.

	Category	Criteria	Compliant	Non compliant	Partially compliant	Not applicable
Socioeocnomic	Recruitment and Training Program	8	7	0	0	1
	Environmental Education Program	7	5	0	0	2
	Program for the Promotion of Local Development	8	5	0	0	3
	Cultural Aspects Management Plan	3	3	0	0	0
	Safety and Security	5	5	0	0	0
	Health	1	1	0	0	0
	TOTAL	32	26	0	0	5

The assessment found 0 non-compliances and 0 partial compliance. The 5 Non Applicable criteria are related to:

- Promoting public disclosure of the vacancies offered, indicating the location for registration of workers, number of vacancies, functions and assignments, taking into account the time necessary for submission to the training of those selected. TWIGG decided not to adopt this measure to avoid a large number of people flocking to Twigg offices from different parts of the province and elsewhere in search of job opportunities.
- Assisting the training of primary education and adult literacy teachers on environmental education, management practices and sustainable development. Due to the constraints caused by the Covid-19 pandemic, it was not possible to implement live training programmes, because schools were either closed or had restricted access.
- The Program for the Promotion of Local Development will be established in writing, in the form of a Memorandum of Understanding or Local Development Agreement (*ADL*) and will be signed by the main stakeholders, namely the Provincial Government or District Administrator, Twigg as the concessionaire and the representative(s) of the target community(ies). The community development agreement was signed by TWIGG, the Balama District Government and local communities in 2017, but the Provincial Government was not involved. However, there is a recommendation in this regard in the EMP which was drafted subsequent to the signing of the agreement. Nevertheless, clause

nine of the agreement provides for a review of the agreement every 5 calendar years, so there is room to include the Provincial Government in the next review of the agreement.

- Encouraging the involvement of traditional leaders, teenagers, cultural groups, community associations, religious organizations and NGOs in facilitating public participation and environmental awareness. However, due to the constraints caused by the Covid-19 pandemic, it has not been possible to implement environmental awareness activities involving traditional leaders, teenagers, cultural groups, community associations, religious organizations and NGOs.
- The representative(s) of the covered Community(ies) are elected during a community meeting and recognized by the District Administrator. The task of selecting community representatives is the sole responsibility of the communities and not within the remit of TWIGG.

The 12 requirements contained in the EMP approval letter issued by the MTA were also audited in order to verify whether or not they were being complied with and all had been met.

In summary, a total of 142 criteria were audited against compliance (99 biophysical, 32 social and 11 related to the requirements set out by the MTA in the updated EMP approval letter). With regard to compliance, there were found zero non-compliances, three partial compliances and 10 criteria were found to be not applicable. It is therefore concluded that 91% of the requirements of the EMP are in compliance. The following graph shows the level of compliance with the EMP.

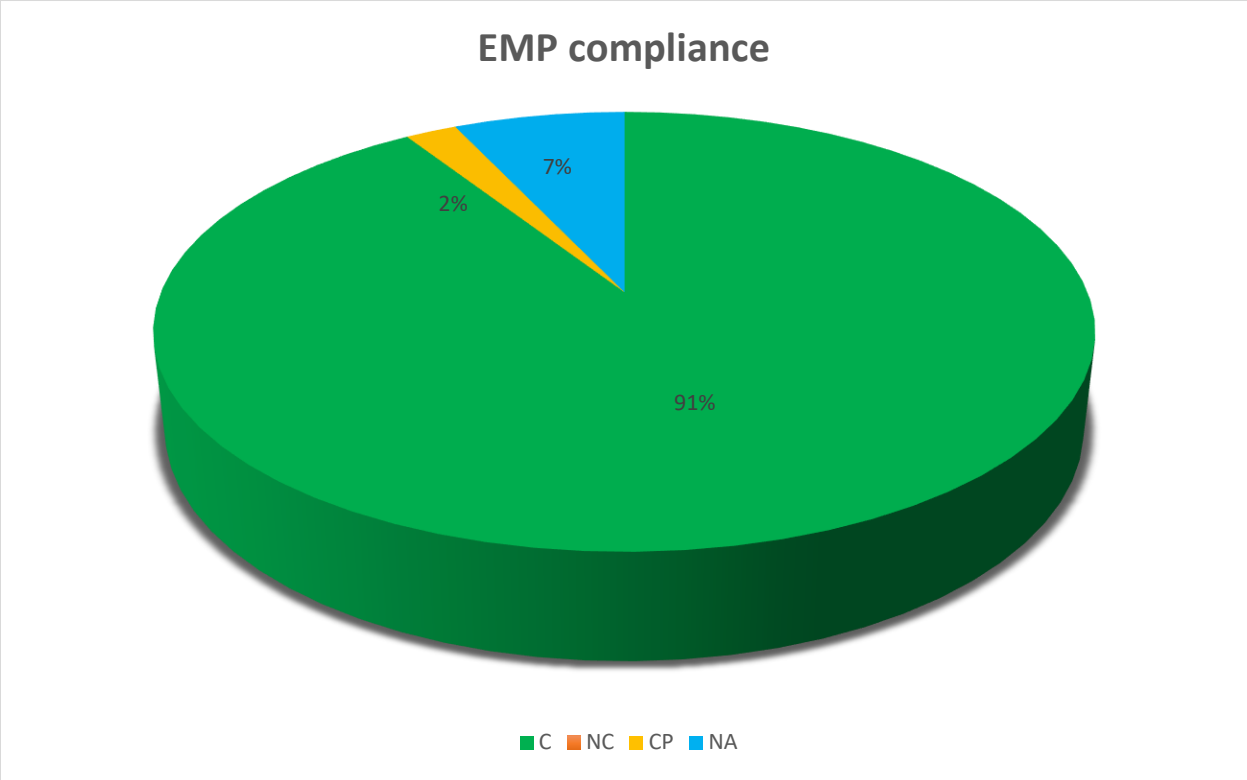


Figure 3 EMP compliance diagram

Main recommendations arising from this audit are the following:

- Continue the positive work and effort throughout the implementation of the measures contained in the Environmental Management Plan.
- Hazardous waste containers must be adequately identified.
- Include the required PPE for handling different types of waste in the Waste Management Plan.

Annexes

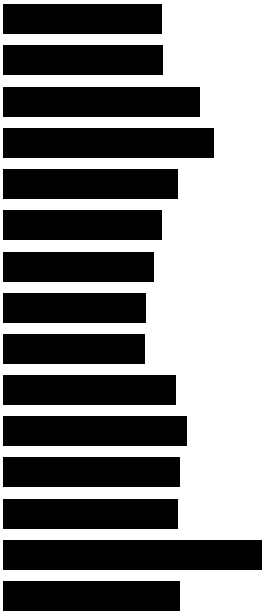
Annex A: Opening Meeting Agenda

15 December 10.00 – 10.30
Teams platform for online Meeting

AGENDA

- Introduction of meeting participants
- Roles of auditor; auditee; guide; observer
- Audit objective (purpose or reason for the audit)
- Audit scope (coverage of areas; processes; clauses)
- Audit criteria (applicable requirements)
- Agenda plan (agenda; assignments; meetings; times)
- Audit methods (observation; interviews; questionnaires)
- Communications (auditee to be kept well-informed)
- Language (to be used during the audit)
- Confidentiality (results only to the auditee)
- Concerns or questions (ready to begin audit?)

Annex B: Opening Meeting Attendance List



Annex C: Closeout Meeting Agenda

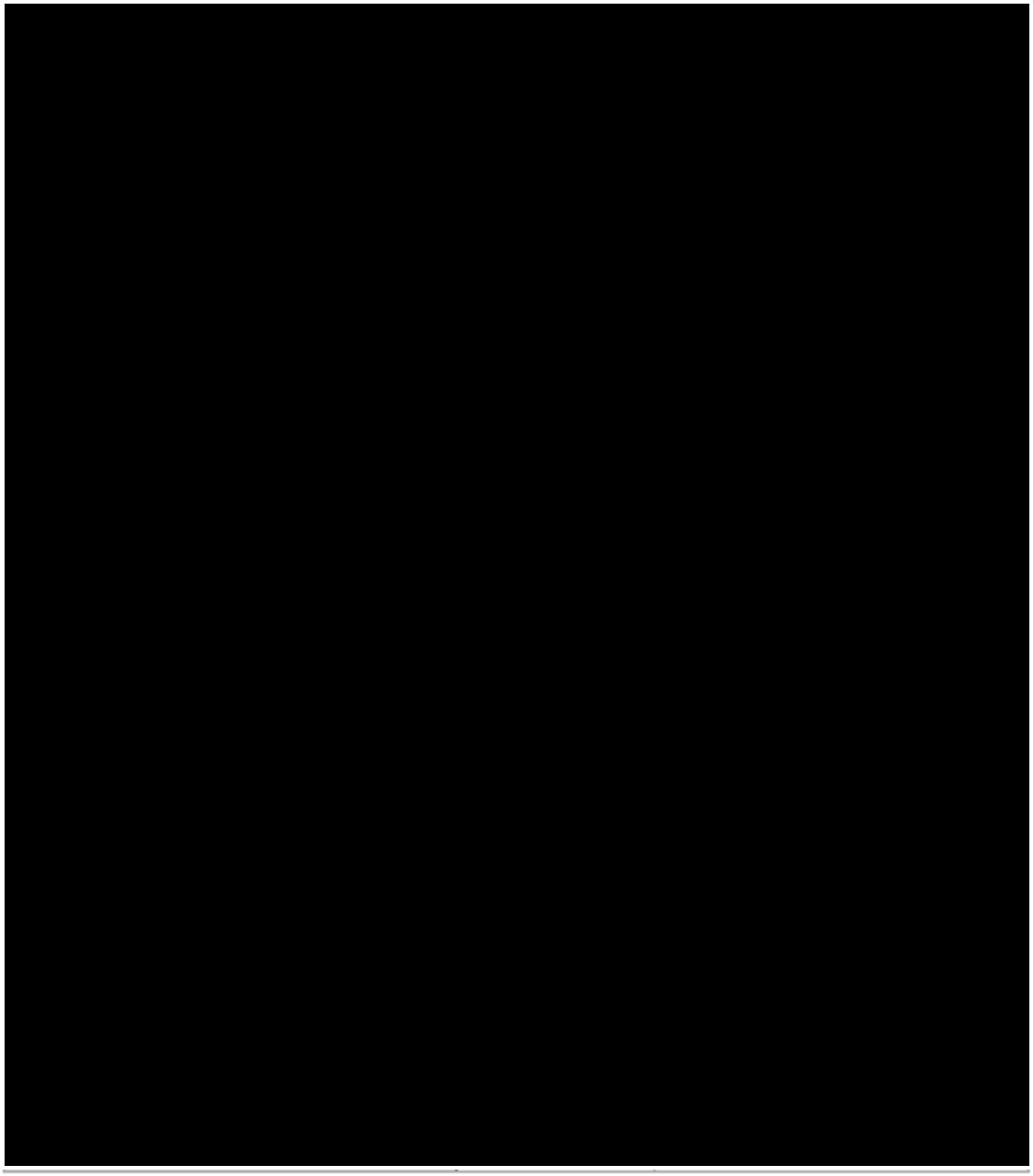
18 December 10.00-10.30
Teams platform for online Meeting

AGENDA

- Introduction of new participants
- Thanks (time and cooperation)
- Scope of audit
- Criteria (ESMP&MP, Environmental Approval, IFC performance standards)
- Conformity areas (strengths, positive aspects)
- Parcial conformities
- Conclusions (conformity, effectiveness)
- Report
- Thanks

Annex D: Closeout Meeting Attendance List

meetingAttendanceList



Annex E: List of Documents Reviewed

- Community Development Agreement signed by TWIGG, Balama District Government and the Communities in May 2017
- Induction presentation - Environmental Management Twigg, 2017
- BAL-ST-EN-0001- Waste labels standard
- Tailings dam: construction report. Advisian. 09.10.2018
- Blast Procedure Presentation
- Environmental and Social Performance Report Submission Letter - January to June 2020, Ref:346/07/TWIGG-IRCS/2020. Date: 29/07/2020
- Certificate of fuel quality
- Safe disposal certificates (MozEnvironmental) dated 25.08.2020
- Road Traffic Code, Decree No. 1/2011 of 23 March
- MozEnvironmental Waste Manifest Certificate, dated 25.11.2020
- Detailed design study. Snowden group. August 2015
- Environmental, Social and health Impact Assessment for the proposed Balama Graphite Mine in the Cabo Delgado Province in the District of Balama in Northern Mozambique, February 2015
- TSF inspection form, dated 12.11.2020
- Gap analysis: brief hydrogeology, geochemistry and surface water review of Balama Graphite Mine. Geostratum, March 2020
- Health and Safety Management Plan. TWG-PL-SA-0001, Revision 4, dated 18 January 2019.
- ICOPAL Mission Report
- MozEnvironmental Environmental License
- Licence for use of radioactive sources issued in December 2020
- Attendance list of training course on waste management, dated 26.07.2020
- Attendance list of training course on effective management and disposal of waste, dated 21.02.2020
- Attendance list of training course on chemicals and hazardous chemicals, dated 14.10.2019
- Attendance list of training session on radiation protection held on 2 April 2019
- Gas MSDS
- Weekly information sharing. Week 13: 23 - 29 March 2020

- Blasting Management Plan. BAL-PL-EN-0002_1. Rev 1 dated 17 October 2020
- Maintenance and inspection plan for the TSF
- Emergency Response Plan for the TSF BAL-PL-EM-0068 Rev0, dated 16 October 2020
- Environmental Safety Plan for the tailings dam GNS.PSA001/19, dated October 2019
- Monthly plan: Waste Rock Dump Heights Diagram
- Air Quality Management Procedure dated 22 October 2020 BAL-PR-EN-0008 Revision 1
- Invasive plant management procedure TWG-PR-EN-0004 rev0, dated 15 December 2017
- Waste Management Procedure BL-PR-EN-0001 Rev 3, dated 16 October 2020
- Landfill Management Procedure BAL-PR-EM _0007 Rev 0, dated 5 December 2017.
- Incinerator Standard Operating Procedure BAL-SOP-RL-0001
- Procedure for deforestation BAL-PR-EN-0015 Rev 0, 24 November 2019
- Tailings dam and dam Inspection procedures BAL-PR-PR-0005 Rev 0, dated 23 October 2020
- Conservation Area and Sustainable Livelihood Procedures BAL-PR-EN-009 Rev1, dated 22 October 2020
- Recruitment, Human Resources and Training Procedure. TWG-PR-HR-0004_2_Pt. Dated 20 May 2020
- Procedure on the Use of Force, (CGM/SOP) dated June 2019
- Online registration of the maintenance plan and vehicles and equipment maintenance report
- Online registration of the maintenance plan and incinerator maintenance report
- Stockpile Report. Snowden, March 2020
- Waste and Effluent Assessment Report. CES, December 2015
- Groundwater quality monitoring report (Intertek) dated 20.11.2020
- Surface water quality monitoring report (Intertek) dated 11.12.2020
- Air quality monitoring report. TrackPro report dated 21.11.2020
- Drainage monitoring report (Intertek) dated 21.01.2020
- Noise monitoring report (Cirrus research plc) dated 28.11.2020 for the towns of Ntete, Maputo, Pirira and Nquide
- Water/oil separator monitoring report (Intertek) dated 16.11.2020
- Monthly monitoring report of the water produced by the STP (Intertek) dated 16.11.2020
- Aquatic Ecology Assessment Report on Riverine Resources in the vicinity of the Balama Graphite Mine Project, Cabo Delgado, July 2019
- Monthly Sustainability Report, November 2020

- Report or protocol of delivery of material for recycling
- Semi-annual report on environmental and social performance from January to June 2020
- Sustainability Report, November 2020
- Environmental inspection reports, dated 20.03.2020
- Noise and vibration monitoring reports: Pirira blasting monitoring, dated 20.07.2019
- Risk register 23.10.2020
- ToR for designing a hydrogeological and geochemical model, dated September 2019
- Terrestrial Faunal Impact Asessment. CES, December 2013
- The Graphitizer – TWIGG Communication, Issue 53 - 7 April 2020
- Training Attendance Register from the meeting held on 27 of August 2020
- WIS – Weekly Information Sharing. Week 13-18 July, Focus: Proper waste management