



Environmental and Social Management System (ESMS) Plan

Aurora Gold Project

Revision 0

Prepared for



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Acronyms

AMP	Annual Mining Plan
ARD	Acid Rock Drainage
ASM	Artisanal or Small-scale Mining
CEO	Chief Executive Officer
CPAR	Corrective/Preventive Action Request
E/EWC	Exploration/Early Works Construction
EPA	(Guyana) Environmental Protection Agency
EPC	Engineering, Procurement, and Construction
ESHS	Environmental, Social, Health, and Safety
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
FWP	Fresh Water Pond
GGI	Guyana Goldfields, Inc.
GIIP	Good International Industry Practice
HSE	Health, Safety, and Environmental
IFC	International Finance Corporation
OHS	Occupational Health and Safety
ROW	Right of Way
SOP	Standard Operating Procedure
TMA	Tailings Management Area
MWP	Mine Water Pond

1 Environmental and Social Management System Description

1.1 General Requirements

In keeping with the requirements of International Finance Corporate (IFC) Performance Standard 1, “Assessment and Management of Environmental and Social Risks and Impacts” (PS 1)¹, Guyana Goldfields, Inc. (GGI) has established an Environmental and Social Management System (ESMS) for the Aurora gold mining project in north-western Guyana (referred to hereafter as the Aurora Gold Project or Project). The ESMS is embodied in this *ESMS Plan* and a series of supporting Management Plans and Standard Operating Procedure (SOPs). These documents will be activated and periodically updated at appropriate points in the mine life cycle to ensure that the ESMS remains responsive to changing environmental, human health and safety, and other social management needs, as well as provide a level of detail that is commensurate with available resources and the nature of the activities being conducted. Collectively, the *ESMS Plan* and its supporting documents constitute a flexible management approach that that is based directly on PS 1 and can readily accommodate the changing needs of the Project. This *ESMS Plan* and its supporting documents supersede *Health, Safety, & Environmental Management System* (Guyana Goldfields, Inc. 2011).

The *ESMS Plan* will apply over the entire mine life cycle, which is generally defined as five sequential phases:

- exploration/early works construction (E/EWC);
- major construction;
- mine operation;
- mine decommissioning, site restoration, and closure; and
- post-closure.

As noted in **Table 1-1**, in addition to the requirements of PS 1, *ESMS Plan* contents also consider applicable elements of:

- the IFC *Environmental, Health, and Safety Guidelines for Mining*² and other IFC Performance Standards (PSs), Guidelines, and good international industry practices (GIIPs) as referenced therein;

¹ See [http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/pol_PerformanceStandards2006_full/\\$FILE/IFC+Performance+Standards.pdf](http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/pol_PerformanceStandards2006_full/$FILE/IFC+Performance+Standards.pdf)

² See [http://www.ifc.org/ifcext/enviro.nsf/AttachmentsByTitle/gui_EHSGuidelines2007_Mining/\\$FILE/Final+-+Mining.pdf](http://www.ifc.org/ifcext/enviro.nsf/AttachmentsByTitle/gui_EHSGuidelines2007_Mining/$FILE/Final+-+Mining.pdf).

Table 1-1: ESMS Plan– References for Structure and Content

<i>ESMS Plan Sections/Subsections</i>	<i>Applicable IFC Performance Standard 1 Requirements</i>	<i>Applicable IFC Mining Guidance Requirements</i>	<i>Corresponding ISO 14001:2004 requirements</i>	<i>Corresponding OHSAS 18001:2007 requirements</i>
1.0 INTRODUCTION				
1.1 ESMS Description	• Requirements, item 5, p. 2	N/A	4.1	4.1
1.2 ESMS Documentation	• Requirements, item 5, p. 2	N/A	4.5	4.5
1.3 Change Management	• Requirements, item 5, p. 2	N/A	4.5	4.5
2.0 POLICY	• Requirements, item 6. pp. 2-3	N/A	4.2	4.2
3.0 IDENTIFICATION OF RISKS AND IMPACTS				
3.1 Legal and Other Requirements	• Requirements, item 7. pp. 3-4	N/A	4.3.2	4.3.2
3.2 Social and Environmental Aspects and Impacts, Risk Assessment, and Risk Management Planning	• Requirements, items 7-12, pp. 3-4	<ul style="list-style-type: none"> • Section 1.1, “Environmental (Impacts and Management)” • Section 1.3, “Community Health and Safety(Impacts and Management)” 	4.3.1	N/A
3.3 Occupational Health and Safety Hazard Identification, Risk Assessment, and Risk Management Planning	• Requirements, items 7-12, pp. 3-4	<ul style="list-style-type: none"> • Section 1.2, “Occupational Health and Safety (Impacts and Management)” • Section 1.3, “Community Health and Safety(Impacts and Management)” 	N/A	4.3.1

<i>ESMS Plan Sections/Subsections</i>	<i>Applicable IFC Performance Standard 1 Requirements</i>	<i>Applicable IFC Mining Guidance Requirements</i>	<i>Corresponding ISO 14001:2004 requirements</i>	<i>Corresponding OHSAS 18001:2007 requirements</i>
4.0 MANAGEMENT PROGRAMS				
4.1 Environmental, Social and Health & Safety (ESHS) Objectives and Targets	<ul style="list-style-type: none"> Requirements, items 13 - 16. pp. 4-5 	<ul style="list-style-type: none"> Section 1.1, "Environmental (Impacts and Management)" Section 1.2, "Occupational Health and Safety (Impacts and Management)" Section 1.3, "Community Health and Safety (Impacts and Management)" Section 2.1, "Environment (Performance Indicators and Monitoring)" Section 2.2, "Occupational Health and Safety (Performance Indicators and Monitoring)" 	4.3.3	4.3.3
4.2 ESHS Performance Improvement Management Program/Management Plans	<ul style="list-style-type: none"> Requirements, items 13 - 16. pp. 4-5 	<ul style="list-style-type: none"> Section 1.1, "Environmental (Impacts and Management)" Section 1.2, "Occupational Health and Safety (Impacts and Management)" Section 1.3, "Community Health and Safety (Impacts and Management)" Section 2.1, "Environment (Performance Indicators and Monitoring)" Section 2.2, "Occupational Health and Safety (Performance Indicators and Monitoring)" 	4.3.4	4.3.4
4.3 Operational Control				
4.3.1 Operational Planning Process	<ul style="list-style-type: none"> Requirements, items 13 - 16. pp. 4-5 	<ul style="list-style-type: none"> Section 1.1, "Environmental (Impacts and Management)" Section 1.2, "Occupational Health and Safety (Impacts and Management)" Section 1.3, "Community Health and Safety (Impacts and Management)" 	4.4.6	4.4.6

ESMS Plan Sections/Subsections	Applicable IFC Performance Standard 1 Requirements	Applicable IFC Mining Guidance Requirements	Corresponding ISO 14001:2004 requirements	Corresponding OHSAS 18001:2007 requirements
4.3.2 Management of Social and Environmental Impacts	<ul style="list-style-type: none"> Requirements, items 13 - 16. pp. 4-5 	<ul style="list-style-type: none"> Section 1.1, "Environmental (Impacts and Management)" Section 1.3, "Community Health and Safety (Impacts and Management)" 	4.4.6	N/A
4.3.3 Control of Contractor Operations	<ul style="list-style-type: none"> Social and Environmental Management System, Element (ii), "Management Program" 	<ul style="list-style-type: none"> Section 1.1, "Environmental (Impacts and Management)" Section 1.2, "Occupational Health and Safety (Impacts and Management)" Section 1.3, "Community Health and Safety (Impacts and Management)" 	4.4.6	4.4.6
5.0 ORGANIZATIONAL CAPACITY AND COMPETENCY				
5.1 Structure and Responsibility	Requirements, items 17 - 19. pp. 5-6	N/A	4.1	4.1
5.2 Training, Awareness, and Competence	Requirements, items 17 - 19. pp. 5-6	<ul style="list-style-type: none"> Section 1.2, "Occupational Health and Safety (Impacts and Management)" 	4.2	4.2
6.0 EMERGENCY PREPAREDNESS AND RESPONSE	Requirements, items 20 - 21, p. 6	<ul style="list-style-type: none"> Section 1.1, "Environmental (Impacts and Management)" Section 1.2, "Occupational Health and Safety (Impacts and Management)" Section 1.3, "Community Health and Safety (Impacts and Management)" 	4.4.7	4.4.7
7.0 MONITORING AND REVIEW				
7.1 ESMS Records		N/A	4.5.3	4.5.3

<i>ESMS Plan Sections/Subsections</i>	<i>Applicable IFC Performance Standard 1 Requirements</i>	<i>Applicable IFC Mining Guidance Requirements</i>	<i>Corresponding ISO 14001:2004 requirements</i>	<i>Corresponding OHSAS 18001:2007 requirements</i>
7.2 Monitoring and Measurement				
7.2.1 ESHS Monitoring	Requirements, items 22 - 24, pp. 6 - 7	<ul style="list-style-type: none"> Section 2.1, "Environment (Performance Indicators and Monitoring)" Section 2.2, "Occupational Health and Safety (Performance Indicators and Monitoring)" 	4.5.1	4.5.1
7.1.2 Regulatory Compliance Verification Audits	Requirements, items 22 - 24, pp. 6 - 7	<ul style="list-style-type: none"> Section 2.1, "Environment (Performance Indicators and Monitoring)" Section 2.2, "Occupational Health and Safety (Performance Indicators and Monitoring)" 	4.5.1	4.5.1
7.2.3 ESHS Performance Measurements	Requirements, items 22 - 24, pp. 6 - 7	<ul style="list-style-type: none"> Section 2.1, "Environment (Performance Indicators and Monitoring)" Section 2.2, "Occupational Health and Safety (Performance Indicators and Monitoring)" 	N/A	4.5.1
7.3 Non-conformance Reporting and Corrective and Preventive Action	Requirements, items 22 - 24, pp. 6 - 7	N/A	4.5.2	4.5.2
7.4 Internal ESHS Management System Audits	Requirements, items 22 - 24, pp. 6 - 7	N/A	4.5.4	4.5.4
7.5 Management Review	Requirements, items 22 - 24, pp. 6 - 7	N/A	4.6	4.6
8.0 STAKEHOLDER ENGAGEMENT				
8.1 Stakeholder Analysis and Engagement Planning	Requirements, items 26-28, pp. 7 - 8	<ul style="list-style-type: none"> Section 1.3, "Community Health and Safety (Impacts and Management)" 	4.3.3	4.3.3
8.2 Disclosure of Information	Requirements, items 29, p. 8	<ul style="list-style-type: none"> Section 1.3, "Community Health and Safety (Impacts and Management)" 	4.3.3	4.3.3

ESMS Plan Sections/Subsections	Applicable IFC Performance Standard 1 Requirements	Applicable IFC Mining Guidance Requirements	Corresponding ISO 14001:2004 requirements	Corresponding OHSAS 18001:2007 requirements
8.3 Consultation	Requirements, items 30, p. 8	<ul style="list-style-type: none"> Section 1.3, "Community Health and Safety(Impacts and Management)" 	4.3.3	4.3.3
8.4 Informed Consultation and Participation	Requirements, items 31, p. 8	<ul style="list-style-type: none"> Section 1.3, "Community Health and Safety(Impacts and Management)" 	4.3.3	4.3.3
8.5 Indigenous Peoples	Requirements, items 32, p. 8 - 9	<ul style="list-style-type: none"> Section 1.3, "Community Health and Safety(Impacts and Management)" 	4.3.3	4.3.3
8.6 Private Sector Responsibilities Under Government-Led Stakeholder Engagement	Requirements, items 33, p. 9	<ul style="list-style-type: none"> Section 1.3, "Community Health and Safety(Impacts and Management)" 	4.3.3	4.3.3
9.0 EXTERNAL COMMUNICATIONS AND GRIEVANCE MECHANISMS				
9.1 External Communications	Requirements, items 34, p. 9	<ul style="list-style-type: none"> Section 1.3, "Community Health and Safety(Impacts and Management)" 	4.3.3	4.3.3
9.2 Grievance Mechanism for Affected Communities	Requirements, items 35, p. 9	<ul style="list-style-type: none"> Section 1.3, "Community Health and Safety(Impacts and Management)" 	4.3.3	4.3.3
10.0 ONGOING REPORTING TO AFFECTED COMMUNITIES	Requirements, items 36, p. 9	<ul style="list-style-type: none"> Section 1.3, "Community Health and Safety(Impacts and Management)" 	4.3.3	4.3.3

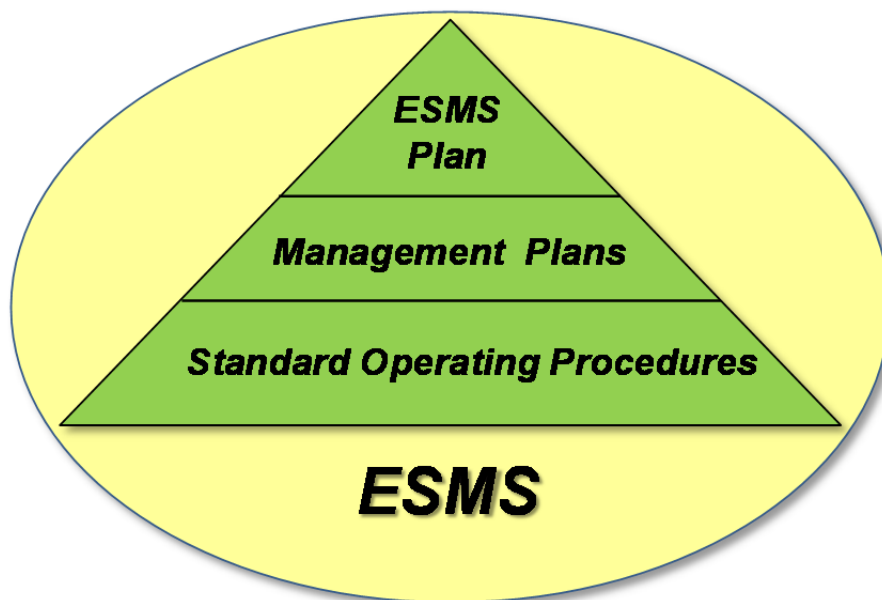
- the ISO 14001 environmental management system standard³; and
- the OHSAS 18001⁴ occupational health and safety (OHS) management system standard.

These standards have been widely and successfully applied by the international mining industry, and collectively provide an appropriate basis for the development of an effective, fully integrated ESMS capable of addressing applicable Guyanese regulatory requirements as well as meeting international norms for the management of the environmental, health and safety, and social aspects of mining project operations.

1.2 ESMS Documentation

The overall hierarchy of documents that comprise the ESMS is depicted in **Figure 1-1**.

Figure 1-1: ESMS Document Hierarchy



³ ISO 14001:2004, *Environmental management systems – Requirements with Guidance for Use*; International Organization for Standardization, Geneva, Switzerland, 2004. ISO 14001 is considered as a GIIP only. References to this standard should not be construed as a commitment to undertake third-party certification.

⁴ OHSAS 18001:2007, *Occupational health and safety management systems – Specification*; OHSAS Project Group Secretariat, London, United Kingdom 2007. OHSAS 18001 is selected as a BMP for OHS program management, as well as for its structural and contextual compatibility with PS-1 and ISO 14001. References to this standard should not be construed as a commitment to undertake third-party certification.

The functions fulfilled by each level of documentation are summarized as follows:

- The highest-tier document in the ESMS is represented by this **ESMS Plan**, which describes the overall structure, requirements, and content of the management system, as well as the organizational structure, key management responsibilities, and the specific functions fulfilled by other categories of system documents. Unless noted otherwise, the *ESMS Plan* and its supporting documents are intended to apply only to the areas, facilities, and activities that constitute the Aurora Gold Project, as defined by the *Guyana Goldfields Inc. Aurora Gold Project Feasibility Study Update Report* (TetraTech, 2013). These are expected to include:
 - surface and underground mining operations at the Aurora site, including exploration activities directly related to development of these specific resources;
 - overburden (topsoil, saprolite, and waste rock) and ore stockpiles;
 - crusher circuit, mill, mineral extraction process plant (including detoxification circuit);
 - machine shops, power plant, water treatment plants, warehouses, man-camp, diesel and No. 4 fuel storage tanks, municipal solid waste landfills, hazardous waste storage facilities, monitoring wells, and associated infrastructure;
 - airstrip and ancillary facilities;
 - haul roads and access roads;
 - tailings pipeline, Tailings Storage Area (TSA), Fresh Water Pond (FWP) and Mine Water Pond (MWP);
 - the Barama (M3) access road from Buckhall to Tapir Crossing, and the GGI-constructed M3 road extension from Tapir Crossing to the Aurora site;
 - Tapir Crossing (ferry, traffic/convoy staging area, and guardhouse) and
 - the Buckhall port and logistics support facility.

The *ESMS Plan* will be periodically reviewed and updated in response to the changes that will occur in various phases of the Project life cycle. It is the primary reference for the overall design and contents of the ESMS, and is meant to serve as a key communication tool in the presentation of the ESMS to lenders, regulatory authorities, and other external parties.

- The *ESMS Plan* will be supported by a suite of **Management Plans**, which are focused on the management or mitigation of the specific environmental and social issues or impacts generally associated with one or more phases of the Project. Management Plan content will depend in significant part on the design assumptions and details contained in (TetraTech, 2013) and the results of the *Updated Environmental and Social Impact*

Assessment - Aurora Project, Guyana (ENVIRON, 2013). A general list of the Management Plans likely to be required over all phases of the Project and their general applicability over the life of the mine is presented in **Table 1-2**. The general scope and purpose of each Management Plan are briefly summarized as follows:

- ***Exploration Management Plan*** – addresses the management of the limited range of environmental and social issues associated with reconnaissance visits to various Project areas by small field teams, in order to locate geological features that merit more detailed geological investigations for the characterization of mineral resources with extractive potential. The plan will also describe the management of access roads to drilling pad locations, the construction and operation of temporary camps, subsurface drilling operations, borehole closure, and drill pad clean-up and restoration. It should be noted this this plan may apply to the management of exploration concessions held by GGI that may be outside the boundaries of the Aurora Project A1 Mining License.
- ***Early Works Construction Management Plan*** – this plan will address the management of environmental and social issues associated with a limited range of GGI construction activities that will be required prior to the major construction of the Aurora Project mine, mill, process plant, Tailings Management Areas (TMA) and supporting infrastructure.
- ***Construction Management Plan*** – this plan will be developed by GGI's Engineering, Procurement, and Construction (EPC) contractor, and will describe the overall organization and management of the major construction phase of the Aurora Project, from initial earthworks through the construction and commissioning of the power plant, fuel storage areas, workshops and warehouses, mill and processing plant, tailings management area, waste rock stockpiles, airstrip, man-camp, water management ponds, waste management facilities, roadways, and other infrastructure.
- ***Blasting Management Plan*** – this plan will be prepared by GGI's blasting contractor and/or blasting engineer, and will describe the safe transportation, storage, handling, and routine use of blasting agents and initiators in the excavation of the open pit and underground mine during the operational phase of the Project.

Table 1-2: Management Plans – General Applicability Over Project Life Cycle

<i>Plan Title</i>	<i>Exploration/Early Works Construction</i>	<i>Construction</i>	<i>Mining Operations</i>	<i>Decommissioning, Site Restoration, and Closure</i>	<i>Post-Closure</i>
<i>Exploration Management Plan</i>					
<i>Construction Management Plan – Early Works</i>					
<i>Construction Management Plan – Major Construction</i>					
<i>Blasting Management Plan</i>					
<i>Overburden Management Plan</i>					
<i>Erosion Prevention and Control Plan</i>					
<i>Water Management Plan</i>					
<i>Annual Mining Plan</i>					
<i>Mill/Leach Plant Operations Plan</i>					
<i>Tailings Area Management Plan</i>					
<i>Occupational Health and Safety/Accident Prevention Plan</i>					
<i>Emergency Preparedness and Response Plan</i>					
<i>Cyanide Management Plan</i>					
<i>Hazardous Materials Management Plan</i>					
<i>Spill Prevention, Control, and Contingency Plan (Aurora Site)</i>					
<i>Buckhall Spill Contingency Plan</i>					
<i>Transportation Management Plan</i>					
<i>Waste Management Plan</i>					
<i>Air Quality Management Plan</i>					
<i>Noise & Vibration Management Plan</i>					
<i>Biodiversity Management Plan</i>					
<i>Mine Reclamation and Closure Plan</i>					

<i>Plan Title</i>	<i>Exploration/Early Works Construction</i>	<i>Construction</i>	<i>Mining Operations</i>	<i>Decommissioning, Site Restoration, and Closure</i>	<i>Post-Closure</i>
<i>Community Relations Management Plan</i>					
<i>Influx Management Plan</i>					
<i>ESHS Monitoring Plan</i>					

- **Overburden Management Plan** – this plan will be developed with EPC and engineering contractor support, and will describe the placement of reserved stockpiles of topsoil, saprolite, and waste rock from the open pit phase of mining operations; it will include requirements for regular inspections of geotechnical stability of stockpiled materials, as well as pH in toe drain water in order to detect the potential development of acid rock drainage (ARD) conditions and guide the implementation of any required mitigation measures.
- **Erosion Prevention and Control Plan** – the *Erosion Prevention and Control Plan* will be applied to all areas (apart from the TMA. Which is managed separately) that are disturbed by mining or support operations and that are susceptible to erosion. This will include regular monitoring of diversionary structures, access and haul road rights of way (ROWs), the Aurora site airstrip and safety ROW, and other recently reclaimed or disturbed areas for erosional conditions or turbid runoff that could impact local streams or tributaries of the Cuyuni River, and the implementation of various appropriate mitigation measures or GIIPs as the situation may require.
- **Water Management Plan** – with engineering contractor support, GGI will develop and maintain a probabilistic water balance model and monitoring program for the construction and operation of the TMA, FWP, MWP, and any associated settling or dilution ponds. Water levels and meteorological data will be monitored to ensure that required design freeboards are maintained in the TMA, FWP, and MWP. Seepage and reclaim water quality will also be monitored in order to ensure that any controlled discharges remain within the effluent discharge guidelines and/water quality standards defined by the Guyana EPA and (IFC, 2007). The plan will also guide the implementation of any required mitigation measures.
- **Annual Mining Plan** – in the operational phase of the project, GGI will prepare and update an annual mining plan that projects anticipated developments of the open pit and underground mine operation, including estimation of ore production and overburden stockpiling needs.
- **Mill/Leach Plant Operations Plan** – at the completion of the construction phase, the EPC contractor and responsible process engineering contractors will prepare standard operations and maintenance plans as part of the commissioning of the power plant, crusher circuit, mill, and mineral extraction/detoxification plant. These contractor-produced plans will form the basis of a compiled master plan for routine use by GGI operators.
- **Tailings Area Management Plan** – addresses the day-to day management of the TMA, including freeboard measurements and inspections of the integrity of the tailings and reclaim water return pipelines, as well as inspection of the geotechnical stability of all embankments, dams, diversionary and spillway

structures, and other earthworks. By reference to the *Water Management Plan*, reclaim water quality will also be monitored on a routine basis, as well as seepage water quality to ensure that any seepage or discharge from the TMA remains within the effluent discharge guidelines and/or water quality standards defined by the Guyana EPA and (IFC, 2007). The plan will also guide the implementation of any required mitigation measures.

- ***Occupational Health and Safety/Accident Prevention Plan*** – this plan addresses all aspects of occupational health and safety on the Project, with emphasis on the identifying required safety behaviors, preventive/protective measures, and the routine implementation of SOPs to minimize the potential for accidents, injuries, and illness within the GGI and contractor workforce. The *Occupational Health and Safety/Accident Prevention Plan* will be updated to specifically address the OHS aspects of underground mining, at least 6 months prior to the start of underground construction to permit ample time from workforce training.
- ***Emergency Preparedness and Response Plan*** – this plan will be designed to minimize the potential for accidents and emergency situations involving the exploration or construction operations, and/or the mine's physical structures or operational practices. The *Emergency Preparedness and Response Plan* will address the minimum geotechnical safety requirements of (IFC, 2007), as well as appropriate GILPs drawn from the International Cyanide Management Code (ICMC)⁵, *APELL for Mining: Guidance for the Mining Industry in Raising Awareness and Preparedness for Emergencies at Local Level* (UNEP, 2001), and other sources.
- ***Cyanide Management Plan*** – GGI will develop and maintain a comprehensive *Cyanide Management Plan* based on the ICMC and its certification audit program guidelines, that addresses all aspects of cyanide procurement, transportation, and use. The *Cyanide Management Plan* will reference applicable operations and maintenance manuals for the specific inspection and preventive maintenance protocols applicable to the cyanide receiving area; cyanide storage and leach tanks and secondary containment structures; process and detoxification plant areas; and tailings and reclaim water pipelines. The *Cyanide Management Plan* will also cross-reference the *Tailings Area Management Plan* for the routine physical inspection of all TMA earthworks and spillway structures for erosional integrity, and the proper function of the reclaim water barge and pumpback system. It will cross-reference procedures in the *Water Management Plan* for the ongoing monitoring of freeboard levels in the TMA, as well as downgradient seepage collection system, monitoring well, and surface water sampling. It will also cross-reference the *Mine Reclamation and Closure Plan*, *Emergency Preparedness and Response Plan*, and *Community Relations*

⁵ See http://www.cyanidecode.org/pdf/9_GoldMiningProtocol.pdf.

Management Plan, and other elements of the Project ESMS as necessary to address other specific ICMC requirements.

- ***Hazardous Materials Management Plan*** – the *Hazardous Materials Management Plan* will contain requirements for weekly inspections of containment integrity, management of accumulated precipitation, segregation of incompatible and materials, the condition of warning or access control signage, and the functionality or readiness of personal protective equipment (PPE) and fire suppression and other emergency systems.
- ***Spill Prevention, Control, and Contingency Plan (Aurora Project Area)*** – this plan will contain requirements for periodic inspections of fuel and non-cyanide reagents and hazardous materials storage area containment integrity, management of accumulated precipitation, and the functionality or readiness of PPE, fire suppression systems or equipment, and other emergency systems.
- ***Buckhall Spill Contingency Plan*** – this plan is designed specifically to minimize the potential for spills of diesel and No. 4 fuel received at the Buckhall fuelling trestle and temporarily stored in the associated fuel storage tanks/logistics support area; guidance is also provided on appropriate actions to take if spillage were to occur.
- ***Transportation Management Plan*** – this plan addresses the management of truck/convoy traffic on the Buckhall to Aurora Project site road, as well as charter aircraft travel to and from the Project airstrip and GGI staff travel to Project sites via crew bus or light vehicles originating in Georgetown. The plan will address rules of the road, travel security, monitoring for erosional damage and illegal or undesirable human influx into the Project concessions, sharing of maintenance responsibilities with other road users, and other requirements.
- ***Waste Management Plan*** – this plan will provide for monitoring the accumulation and disposal of containerized hazardous waste and medical waste; the accumulation and disposal of nonhazardous waste; daily cover of temporary landfills and (when completed) the licensed solid waste landfills at Buckhall and the Aurora site; and monthly sampling for landfill leachate quality. The *Waste Management Plan* will also include requirements for periodic inspections to ensure the erosional stability of the landfill earthworks.
- ***Air Quality Management Plan*** – this plan will require visual monitoring of roadway dust generation (at the Aurora and Buckhall sites and Tapir Crossing) in dry seasons, as the basis for a dust suppression program using water and/or appropriate non-toxic surfactants. The *Air Quality Management Plan* will also establish minimum requirements for an initial ambient workplace air quality survey in the vicinity of the pit and process plant, as well as the underground mine in later phases of mine operation.

- **Noise & Vibration Management Plan** – this plan will require the routine monitoring of the noise and vibration associated with blasting operations in the operations phase and provide data back to the Project Blasting Engineer for use in improving the efficiency of open pit and underground blasting operations. Ambient workplace noise will also be monitored near drilling and loading operations, heavy vehicles, the mill and power plant, and other noise-generating areas of operation, as the basis for designation of hearing protection zones for workers.
- **Biodiversity Management Plan** – this plan will require rapid surveys of flora and fauna (dry season/ wet season, at least every five years) to monitor potential changes to the biodiversity profile of the Project in the operational phase. It will also require ongoing monitoring for the presence of key indicator/potentially endangered species which may require adjustments in operating practices or other measures to protect affected habitat or otherwise minimize potential impacts. The *Biodiversity Management Plan* will also incorporate the *Erosion Prevention and Control Plan* by reference for the detection and mitigation of erosional conditions that could reduce or degrade specific habitats.
- **Mine Reclamation and Closure Plan** – this plan will include specific requirements for monitoring pit lake filling, as well as the completeness of required demolition or removal actions and the effectiveness of the restoration and re-vegetation of the reclaimed overburden/waste rock stockpiles, solid waste landfills, TMA, FWP, MWP, Cuyuni dike areas, roadway ROWs, and other disturbed areas. Specific erosional issues associate with closed areas will be monitored (and if necessary, remediated) in compliance with the *Erosion Prevention and Control Plan*, which will be incorporated by reference. The potential decommissioning and closure considerations for Project infrastructure at Tapir Crossing and Buckhall will also be addressed, given GGI's current understanding of regulatory and stakeholder needs and interests.
- **Community Relations Management Plan** – this plan describes the methods GGI will use to engage the workforce, affected communities (i.e., Buckhall and Aranka Mouth), and other potential stakeholders directly affected by the Aurora Gold Project, and to ensure that relevant environmental and social information is disclosed and disseminated through appropriate outreach and communications procedures.
- **Influx Management Plan** – this plan addresses specific concerns expressed by the Government of Guyana on minimizing the potential for uncontrolled influx of people to the project area, especially during mine construction and operations, and provides specific strategies and procedures for achieving those ends based on applicable World Bank/IFC and United Nations guidance.

- **ESHS Monitoring Plan** – this plan will be designed to capture all of the specific monitoring needs identified in individual Management Plans and supporting SOPs, as well as the Project’s updated ESIA (ENVIRON, 2013); it will provide for the development and maintenance of a spreadsheet documenting the planning, execution, and reporting actions associated with the environmental and social monitoring requirements that will apply over the construction, operation, decommissioning/closure, and post-closure phases of the Project.

All Management Plans will be organized for effectiveness in implementation, and, as appropriate for the subject matter, will include:

- a clear statement of objectives or purpose;
- a brief discussion of the relationship to the overall structure and purpose of the Project ESMS;
- regulatory or GIIP references, as applicable;
- roles and responsibilities of key personnel;
- specific measures, procedures, or practices (with detail either included or invoked by references to SOPs, other Management Plans, or other documents) to prevent or mitigate the environmental or social issues or impacts that are the primary focus of a given Management Plan;
- training requirements (see **Section 5.2**);
- inspection and/or monitoring requirements associated with Plan implementation, including cross references to non-conformance resolution processes (see **Section 7**); and
- any external or internal reporting requirements.

Modifications may also be required to incorporate the results of regular environmental, social, and health and safety (ESHS) risk reviews as discussed in **Sections 3.2 and 3.3**. All of these changes and modifications will be controlled within the context of this *ESMS Plan* as described in **Section 1.3**.

It should be noted that development and finalization of all Management Plans substantially depends on details that will be finalized in (TetraTech, 2013) and final ESIA (ENVIRON, 2013) as well as the availability of staffing, appropriate resources, and GGI’s authorization to commence Project construction. Advance implementation of preliminary versions of selected Management Plans and/or SOPs may be authorized in response to specific project needs by the Vice President (VP), Aurora Project and/or Environmental Manager, as noted in **Section 5.1**.

- The *ESMS Plan* and the various Management Plans will also be supported by a suite of **Standard Operating Procedures** (SOPs). SOPs are written specifically to guide GGI workers and (when invoked by contract, all or in part) contractor personnel in the day-to-day performance of specific field or office activities required by the upper-tier plans. SOPs will be developed with a level of detail commensurate with the phase of the project, the complexity of the task, current staffing levels, and the capabilities and experience of the workforce. SOPs may support one or several Management Plans and one or several Project phases. A list of the SOPs currently developed to support this *ESMS Plan* is presented in **Table 1-3**.

Table 1-3: Aurora Gold Project SOPs

SOP Designator	SOP Title
GG-01	“Solid Waste Management (Pre-Construction Phase)”
GG-02	“Preparation, Review, Approval, and Update of Standard Operating Procedures”
GG-03	“Field Inspections”
GG-04	“Identification of Non-conformances and Corrective/Preventive Action”
GG-05	“Records Management”
GG-06	“ESMS Training Program”
GG-07	“Distribution and Control of ESMS Documents”
GG-08	“Environmental and Social Footprint Surveys”
GG-09	“Identification of Project-related Safety Hazards and Assessment of Risks”
GG-10	“Prevention and Monitoring of Communicable Diseases”
GG-11	“Personal Protective Equipment”
GG-12	“First Aid and Emergency Medical Response”
GG-13	“Transportation Safety – Light Vehicles”
GG-14	“Handling and Storage of Hazardous Materials”

SOP Designator	SOP Title
GG-15	"Forklift Safety"
GG-16	"Safe Operation of Heavy Equipment"
GG-17	"Vehicle Fuelling and Spill Prevention"
GG-18	"Machine Guards and Safety Barriers"
GG-19	"Welding and Cutting Safety"
GG-20	"Electrical Safety"
GG-21	"Confined Space Work Safety"
GG-22	"Fire Prevention Program"
GG-23	"Operational Safety Meetings"
GG-24	"Recognition and Reporting of Safety Hazards"
GG-25	"Chance Archaeological Finds"
GG-26	"Safe Use of All-Terrain Vehicles"
GG-27	"Chainsaw Safety"
GG-28	"Heat Stress"
GG-29	"Determination of Environmental and Social Aspects and Significant Impacts"
GG-30	"Environmental and Social Objectives, Targets, and Performance Improvement Program"
GG-31	"Development and Maintenance of Legal and Regulatory Requirements Register"
GG-32	"Regulatory Compliance Verification Audits"
GG-33	"Internal ESMS Audits"
GG-34	"Management Reviews"
GG-35	"Community Health and Safety Awareness Meetings"
GG-36	"Lockout/Tag-out Requirements"

SOP Designator	SOP Title
GG-37	“Control of Erosion and Sedimentation”
GG-38	“Working from Heights”
GG-39	“Monitoring and Maintenance of Potable Water Quality”
GG-40	“Site Security”
GG-41	“Management of Aviation Fuel and Fuelling Operations”
GG-42	“Helicopter Safety”
GG-43	“Safe Operation of Grove Model 530 Hydraulic Cranes”
GG-44	“Management of Land Clearances”

Additional SOPs required for the long-term implementation of the *ESMS Plan* and Management Plans may also be developed and issued at any time in accordance with GG-02, “Preparation, Review, Approval, and Update of Standard Operating Procedures.”

In addition, two special SOPs developed by GGI and previously approved by the IFC will also be invoked in support of this *ESMS Plan*; see **Appendix A**, “Labour Grievance Procedure” and **Appendix B**, “Community and Environmental Grievance Procedure.”

1.3 Change Management

It must be emphasized that in order for the ESMS to be effective in actual practice, the overall complexity and level of detail provided in the Management Plans and their supporting SOPs must be commensurate with GGI’s level of employment, the availability of qualified personnel resources, the overall complexity and significance of the environmental and social risks associated with the activities being conducted, and the financial and other business management resources that are available during the associated Project phase. SOP preparation, review, approval, controlled distribution, and update requirements are defined by GG-02, “Preparation, Review, Approval, and Update of Standard Operating Procedures.” Latest approved versions of all levels of ESMS documents will be subject to controlled distribution in accordance with GG-07, “Distribution and Control of ESMS Documents.” All Management Plans and SOPs will be subject to review and approval by the Environmental Manager and VP, Aurora Project prior to issue.

2 Policy

The human resources, social, environmental, and occupational health and safety (OHS) policies of the Aurora Project are defined in **Appendix C** and consist of:

- “Guyana Goldfields Inc., Human Resources Policy”;
- “Community Relations Policy Statement – Aurora Project”; and
- “Environmental, Health, and Safety Policy Statement – Aurora Project.”

The VP, Aurora Project and the Environmental Manager have key roles in ensuring proper policy implementation at all levels of the organization, through the administration of this *ESMS Plan* and the various monitoring measures described herein. Taken in combination, these policies emphasize open communication and consideration of the social and environmental interests of affected communities and residents, regulatory authorities, the Aurora Project workforce, and other stakeholders. Beginning with the major construction phase of the Project, the suitability and effectiveness of these policy statements will be evaluated at least annually as part of the management review process described in Section 7.5. Policy contents will also be communicated to the Project workforce through periodic human resources, social, environmental, and OHS awareness training (see Section 5.2), and by distribution and posting of the policy documents in key locations at GGI’s headquarters locations in Georgetown, the Buckhall site, the Aurora Base camp, Tapir Crossing, and other facility locations.

Project contractors will also be advised on applicable policy requirements through their individual procurement documents, as noted in Section 4.3.3. Copies of these policies will also be distributed in response to specific requests for information, or as may otherwise be directed by Project management.

3 Identification of Risk and Impacts

3.1 Legal and Other Requirements

The Aurora Project will maintain understanding of the full scope of legal and regulatory requirements that apply to all phases of the mine life cycle, as well as any associated planning, operating, monitoring, or reporting requirements. In the E/EWC phase, the Project will rely on the preliminary assessment of such requirements made in the original version of the ESIA (ERM, 2010). Prior to the initiation of the major construction phase of the project, however, procedure GG-31, “Development and Maintenance of Legal and Regulatory Requirements Register” will be implemented in order to provide guidance for routinely integrating required permitting actions into the advance planning and scheduling of construction, and operations activities, as well as new exploration activities that may be initiated in those phases. This understanding will be considered in the risk and impact evaluation process described in **Section 3.2**. GG-31 will also provide for the development and regular update of a Project-specific register of regulatory requirements that is based on the regulatory setting defined in the current

ESIA, as well as other voluntary lender and industry-specific standards that GGI may choose to adopt for this Project (e.g., applicable IFC performance standards and industry-specific guidelines). GG-31 will also require that the Project establish and maintain access to appropriate information sources as the means to identify new or modified regulatory requirements or changes that may affect any phase of Project operations.

As noted in Section 7.2.2, after the initiation of the major construction phase, the Project's regulatory compliance status will be subject to an internal verification audit on at least an annual basis in accordance with GG-32, "Regulatory Compliance Verification Audits." Any compliance issues that may be detected in the verification audit process will be formally resolved in accordance with GG-04, "Identification of Non-conformances and Corrective/Preventive Action."

3.2 Social and Environmental Aspects and Impacts, Risk Assessment, and Risk Management Planning

An initial assessment of the social and environmental aspects and potential impacts associated with exploration, mining, milling, decommissioning and closure, and post-closure operations is documented in the original ESIA (ERM, 2010). The potential environmental and social impacts that will be identified in the updated ESIA (ENVIRON, 2013) will be reflected in the Management Plans, listed in **Table 1-2** and described in greater detail in **Section 4.3.2**.

As previously noted, a final update of the ESIA (ENVIRON, 2013) is anticipated prior to the beginning of the construction phase of the Project. The social and environmental impacts so identified will be summarized and documented in a project-specific list or register, which will be evaluated on at least an annual basis in accordance with GG-29, "Determination of Environmental and Social Aspects and Significant Impacts." GG-29 is designed to address the identification of new impacts or any subsequent additions or modifications to the results of the updated ESIA that may be prompted by changes in environmental or operational conditions, lender requirements or other stakeholder interests, regulatory requirements, or other important considerations. The input provided by local/external stakeholders will also be identified and specifically considered in the evaluation of social and environmental aspects and impacts. Any necessary changes in the aspects/impacts register will be reflected in appropriate modifications or additions to the Project's Management Plans or other performance improvement measures, as discussed in **Section 4.3** and GG-30, "Environmental and Social Objectives, Targets, and Performance Improvement Program."

3.3 Occupational Health and Safety Hazard Identification, Risk Assessment, and Risk Management Planning

As noted in **Table 1-3**, GGI has developed an initial group of OHS-related SOPs to address predicted hazards and OHS risks, based on the preliminary assessment of project characteristics described in (ENVIRON, 2013) and (TetraTech, 2013). Work area-specific risks that will need to be addressed as the Project progresses will be evaluated and documented in a periodically updated register of risks and mitigation measures, in accordance with GG- 09,

“Identification of Project-related Safety Hazards and Assessment of Risks.” The results of this periodic evaluation will form the basis of the OHS component of an ongoing performance improvement program, which will be implemented at the start of major construction and is further described in **Section 4.3** and GG-30, “Environmental and Social Objectives, Targets, and Performance Improvement Program.” In the meantime, hazards or unsafe conditions that may be observed will be documented and reported as noted in GG-24, “Recognition and Reporting of Safety Hazards,” and will be investigated and considered, as appropriate, in updates or additions to affected Management Plans. Should additional SOPs be required to address newly observed conditions or other Management Plan needs, they will be developed in accordance with GG-02, “Preparation, Review, Approval, and Update of Standard Operating Procedures.”

4 Management Programs

4.1 Environmental, Social, and Health & Safety (ESHS) Objectives and Targets

At the start of the major construction phase of the Project and on at least an annual basis thereafter, performance objectives and targets will be set in an effort to further minimize or mitigate the environmental and social impacts described in **Section 3.2**, as well as any identified OHS hazards and risks as discussed in **Section 3.3**, over and above the measures that may already be in effect in existing Management Plans or SOPs. This process is documented in GG-29, “Environmental and Social Objectives, Targets, and Performance Improvement Program”, and is designed to ensure that objectives and targets are prioritized for improvement action on the basis of: the relative significance of their associated impacts; the presence or absence of specific regulatory, stakeholder, or OHS issues; and the presence, adequacy, or effectiveness of current Management Plans or SOPs.

4.2 ESHS Performance Improvement Management Program/Management Plans

At the start of the major construction phase of the Project, GGI will also begin to implement an annual social, environmental, and OHS performance review and improvement process that updates (or generates new) Management Plans to mitigate specific impacts or undertake specific performance improvements, based on the performance objectives and targets discussed in **Section 4.1** and GG-29, “Environmental and Social Objectives, Targets, and Performance Improvement Program.”

GG-07 requires that technical guidance and appropriate scheduling information be provided for each performance improvement action. Current regulatory requirements (see **Section 3.1**) and communications from external stakeholders (see **Section 8.1**) will also be considered in the process of preparing and updating individual Management Plans. Progress toward the completion of the improvement actions so defined will be monitored as described in **Section 7.2.1** of this *ESMS Plan*. Final review and approval of specific performance improvement actions will be conducted as part of the annual management review process described in **Section 7.5**.

4.3 Operational Control

4.3.1 Operational Planning Process

Prior to the operational phase of the Project, GGI will establish and begin to implement an Annual Mining Plan (AMP) under the direction of the mine's General Manager. The AMP will address the general scope of anticipated mining and ore processing activities over the next planning year. AMP preparers will specifically consider the impacts and management and mitigation measures noted in the final ESIA and the performance improvement plans discussed in **Section 4.2**. The draft document will be submitted for evaluation by the Environmental Manager and other management staff in order to ensure that regulatory and stakeholder issues and general feedback on environmental, social, and OHS performance are properly considered in the long-range planning of mining and ore processing, as well as any new exploration operations. When approved, the AMP will form the general framework within which monthly and weekly operational planning meetings are conducted. Operational instructions will typically be generated as the output of such meetings, and distributed to supervisory and other personnel as necessary to guide ongoing mining operations.

4.3.2 Management of Social and Environmental Impacts

As noted in **Section 4.2** and **Table 1-2**, a series of detailed Management Plans will be developed to address those areas of mine operations for which the ESIA process has indicated that potentially significant environmental and social impacts are known to exist, or could potentially occur in one or more phases of the mine life cycle. Where necessary, these Management Plans will be supported by SOPs. All such documents are subject to periodic evaluation, refinement, and update in response to changing regulations, process changes or improvements, or other change requirements, in accordance with the processes described in **Section 1.3**.

The specific environmental impacts associated with any field investigation or preliminary construction activity that involves a surface disturbance will be identified, documented, and appropriately mitigated in accordance with the process defined in GG-08, "Environmental and Social Footprint Surveys." GG-08 specifically requires the identification, flagging, protection, documentation, reporting, and controlled investigation of environmentally sensitive areas or species. GG-25, "Chance Archaeological Finds" will be invoked if artefacts or structures with potential archaeological, historical, or cultural value are identified in a footprint survey. Field activities near any such find shall be set back at least 10 meters unless other setback considerations are directed by regulatory authorities. GG-40, "Site Security" provide guidelines that shall be followed if artisanal or small-scale mining (ASM) or hunting encampments are encountered in or near environmental clearance areas in the Project concession or along the Buckhall to Aurora access corridor. Also, as discussed in **Section 3.2**, at the start of the construction phase, the Project will also commence an annual evaluation of the OHS hazards and risks associated with its operations, in accordance with procedure GG-09, "Identification of Project-Related Safety Hazards and Assessment of Risks." The results of this evaluation may

prompt OHS performance improvements as described in **Section 4.2**, or updates or additions to the SOPs or Management Plans listed previously. Hazardous or unsafe conditions that may be observed in the course of the Project are to be documented in accordance with GG-24, “Recognition and Reporting of Safety Hazards,” investigated, and, if appropriate, also considered in updates or additions to the Management Plans and/or SOPs. Additional procedural controls may be established for newly observed conditions, as appropriate, in accordance with GG-02, “Preparation, Review, Approval, and Update of Standard Operating Procedures.”

4.3.3 Control of Contractor Operations

GGI purchasing or contracts staff will co-ordinate with the Environmental Manager as necessary to ensure that appropriate environmental, OHS, and safety behavioural controls are included in the purchase orders or contracts issued to suppliers and contractors, in accordance with GGI’s standard procurement processes. GGI policy, Management Plan, or SOP requirements may be invoked directly without modification, or selected requirements may be invoked as appropriate for the nature of the procurement and the capabilities of the contractor; contractor training needs will be defined as appropriate. In the construction and operations phases, special contractual controls applicable to suppliers and transporters of cyanide reagent, fuel, and other hazardous materials will be described in the *Emergency Preparedness and Response Plan*, *Cyanide Management Plan*, *Hazardous Materials Management Plan*, and other Management Plans as required. Other appropriate contractual requirements will be invoked to ensure that the delivery of hazardous materials as well as non-hazardous materials and equipment or other contractor operations at the mine or Buckhall sites do not negatively impact the regulatory compliance status of the Project or compromise the effectiveness of the ESMS. Contractor staff may be requested to participate in emergency response drills or other training exercises, at the discretion of the Environmental Managers or Environmental/Health and Safety Officers; any such participation requirements will be incorporated in the governing procurement document.

5 Organizational Capacity and Competency

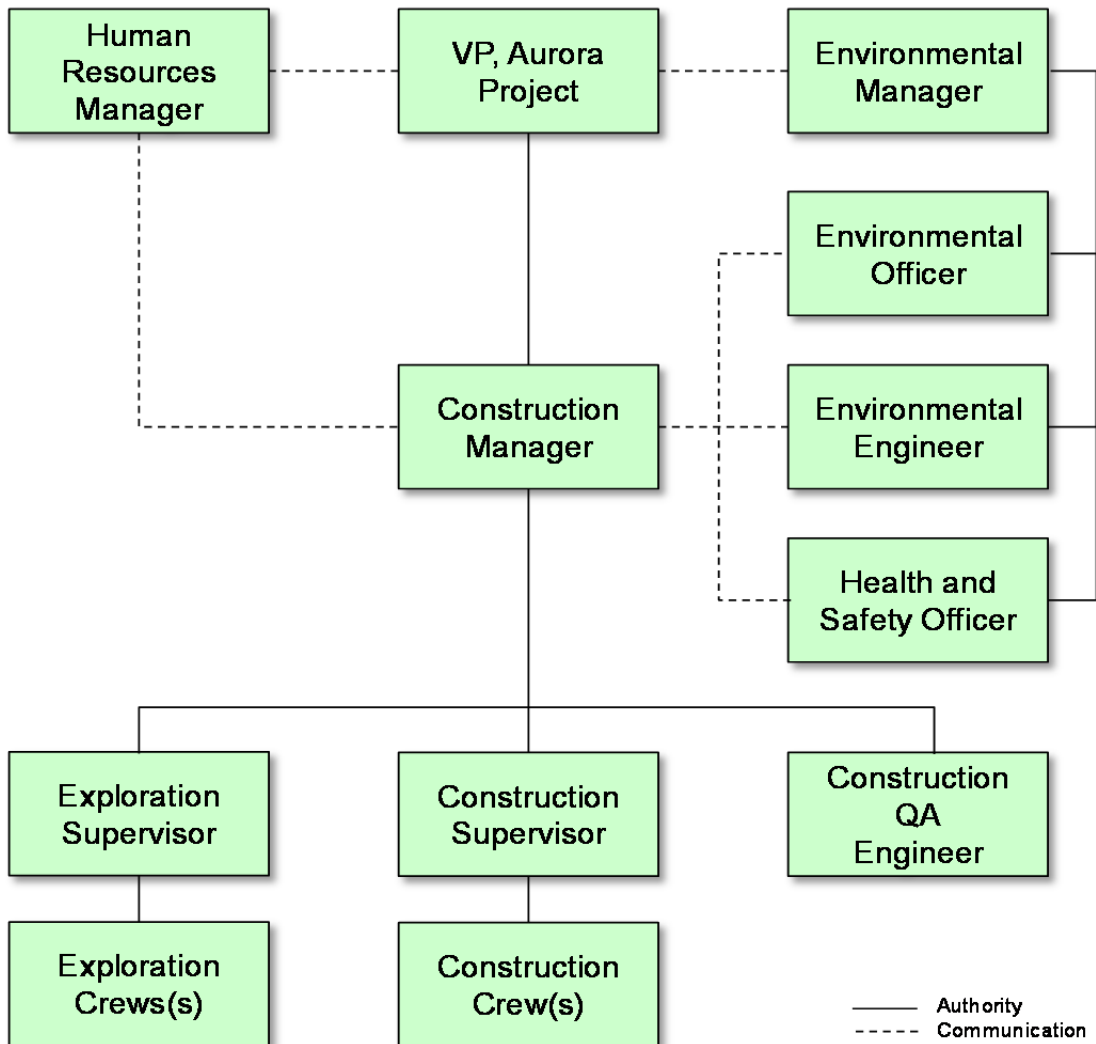
5.1 Structure and Responsibility

Figure 5-1 depicts GGI’s current project organization for the Aurora Project.

All GGI employees are individually and collectively responsible for:

- working safely, within the guidelines and requirements established by this *ESMS Plan* and its supporting Management Plans and SOPs;
- supporting the environmental, social, and OHS policies established for the Aurora Project (see **Appendix C**) in the day to day performance of their work;

Figure 5-1: Organizational Chart – Aurora Project



- notifying their supervisors, the Environmental Manager, the Environmental Officer, or the Health and Safety Officer of any observed spills, equipment malfunctions, unsafe or unhealthy situations, improper environmental practices, worsening trends, or other issues that could represent nonconformance with the requirements this *ESMS Plan* or its supporting Management Plans or SOPs.

Other specific responsibilities associated with the key positions noted in **Figure 5-1** are summarized as follows:

- **VP. Aurora Project:** The GGI VP, Aurora Project has overall responsibility for successful completion Project activities in the manner described in this *ESMS Plan* and

the supporting Management Plans and SOPs described herein. The VP, Aurora Project also assumes a lead role in the investigation and resolution of any community relations issues that may occur in the course of the Project.

- **Construction Manager:** The Construction Manager is responsible for overseeing day-to-day clearance and/or construction activities. These duties include review of construction reports to monitor progress and issues encountered, and in assisting the Environmental and Health and Safety Officers in the timely resolution of any observed health, safety, and environmental (HSE) issues.
- **Environmental Manager:** The Environmental Manager is responsible for administering GGI's ESMS management system, and will participate in the review, approval, and as necessary, update or modification of this *ESMS Plan* and supporting Management Plans and SOPs in response to changing project conditions. The Environmental Manager will also provide management support to the Environmental Engineer and the Environmental and Health and Safety Officers as necessary to ensure proper implementation of ESMS planning requirements,
- **Human Resources Manager:** The Human Resources Manager will assist the Construction Manager in the resolution of any workforce concerns or complaints that may be encountered in the course of the Project. The Human Resources Manager may also be requested to assist the VP, Aurora Project in the investigation and resolution of any issues that involve local communities or stakeholders.
- **Environmental Officer:** The Environmental Officer will be responsible to the Environmental Manager for the regular monitoring of project activities to ensure continuing compliance with this *ESMS Plan*; see **Section 7.0**. The Environmental Officer will provide input to periodic HSE monitoring reports, and may also conduct focused inspections of specific environmental or social/community relations issues at the request of the Construction Manager or Environmental Manager.
- **Environmental Engineer:** The Environmental Engineer will be responsible to the Environmental Manager for assisting in special environmental tasks, as well as the regular monitoring of project activities to ensure continuing compliance with this *ESMS Plan*. Special assignments may include advising the construction team on applicable World Bank/ IFC requirements, best management practices for stockpiling of topsoil and erosion control, reviewing engineering designs for environmental compliance, and monitoring resolution of corrective actions from ESHS audits. The Environmental Engineer may provide input to periodic HSE monitoring reports, and may also conduct focused inspections of specific environmental or social/community relations issues at the request of the Environmental Manager.
- **Health and Safety Officer:** The Health and Safety Officer will be responsible to the Environmental Manager for periodic monitoring of project activities to ensure continuing compliance with the occupational health and safety aspects of the *ESMS Plan*. The

Health and Safety Officer will provide input to the HSE monitoring report, and may also conduct focused inspections of specific health and safety or social/community relations issues at the request of the Environmental Manager or VP, Aurora Project.

- **Construction Supervisor:** The Construction Supervisor will direct the day-to-day activities of the surveyors, equipment operators, and other members of the construction workforce. The Construction Supervisor will prepare periodic reports for the Construction Manager that describe progress made and problems encountered, and will assist the Construction Manager in evaluating such problems and adjusting work plans accordingly.
- **Construction Quality Assurance (CQA) Engineer:** The CQA Engineer will be responsible to the Construction Manager for the day-to-day monitoring of construction to ensure that it conforms to approved engineering drawings and specifications and the underlying requirements of the national standards invoked for road design. The CQA Engineer will review the Construction Supervisor's progress reports and note any corrections or improvements that will need to be factored into work planning.
- **Exploration Supervisor:** The Exploration Supervisor will direct the day-to-day activities of the geologists, surveyors, equipment operators, and other members of the prospecting or exploration workforce. The Exploration Supervisor will prepare a periodic report for the Construction Manager that describes progress made and problems encountered, and will assist the Construction Manager in evaluating problems and adjusting work plans accordingly.

5.2 Training, Awareness, and Competence

The Aurora Project workforce will be provided appropriate types and levels of training in accordance with GG-06, "ESMS Training Program." Training subjects and methods will be selected that are commensurate with the characteristics of routine and emergency work assignments, as well as any OHS hazards or environmental and social impacts that may be associated with such assignments. Training methods will be selected based on job descriptions and the experience and qualifications of the employee. At a minimum, all employees and new hires will receive awareness training that (as appropriate for the phase of the Project) addresses:

- GGI's community relations and HSE policies and commitments (see **Section 2.0**);
- GGI's human resources policy and associated disciplinary procedures (see **Appendices C and A**);
- the primary social and environmental aspects of the Aurora Gold Project, their significant impacts, and the measures that must be employed to manage or mitigate such impacts;

- the primary workplace OHS hazards likely to be encountered, and how to avoid such hazards or mitigate their risks or effects (see the risk register developed under GG-16, “Identification of Project-related Safety Hazards and Assessment of Risks”); and
- any significant regulatory or community stakeholder concerns that must be considered in day-to-day operations (see the complaint records required by **Appendix B**).

Refresher training will be provided to all staff on at least an annual basis. Additional training in the specific requirements of the plans and procedures that support the ESMS will be provided, as appropriate for individual work assignments. Specific training requirements applicable to suppliers or contractors will be defined within the context of their individual contracts or purchase orders as discussed in **Section 4.3.3**. All site visitors will be escorted and required to complete an ESMS briefing on arrival at Aurora Base or the Buckhall site.

6 Emergency Preparedness and Response

The *Emergency Preparedness and Response Plan* will apply to all phases of the Project, and is designed to minimize the potential for accidents and emergency situations involving the exploration and construction activities, and mine’s physical structures or operational practices. The *Emergency Preparedness and Response Plan* will also address the minimum geotechnical safety requirements of the IFC’s *Environmental, Health, and Safety Guidelines for Mining* (IFC, 2007), as well as GIIPs drawn from *APELL for Mining: Guidance for the Mining Industry in Raising Awareness and Preparedness for Emergencies at Local Level* (UNEP, 2001) and other sources.

The *Emergency Preparedness and Response Plan* will be developed in conjunction with the other Management Plans developed for specific major construction, operation, decommissioning/ closure, and post-closure phase activities (see **Section 4.2**), and will be reviewed and updated, as appropriate, on at least an annual basis. The *Emergency Preparedness and Response Plan* will identify key emergency-related roles and responsibilities, and will provide direction on required responses to operational or environmental emergencies. The *Emergency Preparedness and Response Plan* will also be supported by several key SOPs, including:

- GG-09, “ESMS Training Program”;
- GG-22, “Fire Prevention Program”;
- GG-23, “Operational Safety Meetings”;
- GG-24, “Recognition and Reporting of Safety Hazards”;
- GG-40, “Site Security.”

The *Emergency Preparedness and Response Plan* will also contain requirements for periodic tests and drills to ensure that necessary response actions are understood by GGI’s designated mine rescue team, other project staff, contractors, and, as appropriate for the given location, community emergency response personnel. In addition to the emergency notification

requirements addressed in the *Emergency Preparedness and Response Plan*, the circumstances and response actions associated with any significant spills, releases, accidents, near-misses, or other emergency situations for which the Aurora Gold Project has direct responsibility will be documented and investigated, and appropriate corrective and preventive actions will be taken in conformance with **Section 7.3** and GG-04, "Identification of Non-conformances and Corrective/Preventive Action." Preventive actions in such cases will require a mandatory review of the adequacy and effectiveness of the *Emergency Preparedness and Response Plan* and its supporting procedures, and subsequent updates as warranted by the results of the review.

7 Monitoring and Review

7.1 ESMS Records

Records generated as output from the implementation of the *ESMS Plan* and its supporting plans and procedures will be filed and maintained by administrative staff under the direction of the Environmental Manager, in accordance with procedure GG-05, "Records Management." GG-05 defines records organization, retention, and storage and retrieval requirements, as well as access control and other requirements designed to preserve the accessibility and integrity of records.

7.2 Monitoring and Measurement

7.2.1 ESMS Monitoring

Specific ESMS monitoring considerations may be addressed in individual Management Plans and supporting SOPs. However, a comprehensive Project *Environmental and Social Monitoring Plan* will also be developed to capture all of the specific monitoring needs identified in these documents and the final ESIA (ENVIRON, 2013). The *Environmental and Social Monitoring Plan* will provide for the development and maintenance of a spreadsheet documenting the planning, execution, and reporting actions associated with the environmental and social monitoring requirements that will apply in the construction, operation, decommissioning/closure, and post-closure phases of the project. The sources of these requirements may include:

- current environmental and social monitoring protocols already established by the Project as a result of ESIA activities;
- additional environmental, social, and OHS monitoring parameters that may be identified by the and other Guyanese regulations;
- progress monitoring requirements associated with the performance improvement process described in **Section 3.4**; and

- other specific environmental or social monitoring requirements established by individual Management Plans.

With respect to environmental monitoring, maps depicting monitoring locations for surface water flow and water quality, groundwater levels, groundwater quality, air quality, and meteorological information, as appropriate for the construction phase of the Project will be included in early iterations of the *Environmental and Social Monitoring Plan*. Appropriate updates shall be made as the Project proceeds from construction to operation, decommissioning/ closure, and post-closure. Specific sampling and monitoring SOPs and required laboratory analytical procedure requirements will be invoked by reference.

Non-conformances noted in monitoring activities will be resolved through the corrective and preventive action process discussed in **Section 7.3**. The *Environmental and Social Monitoring Plan* will also describe the preparation and independent review, approval, and issue of an annual performance monitoring report. Consideration of the annual performance monitoring report results will represent a major component of the management review process described in **Section 7.5**.

7.2.2 Regulatory Compliance Verification Audits

No later than one year after the commencement of the major construction phase (and annually thereafter), the Environmental Manager will request a detailed verification of Project compliance with applicable regulations, in accordance with GG-32, “Regulatory Compliance Verification Audits” as described in **Section 3.1**. Audits may be conducted by GGI personnel or qualified contractors, subject to the functional independence, training, and qualification requirements noted in GG-32. The current versions of the regulatory requirements list developed in accordance with **Section 3.1** will be used as a primary reference for the audit, and audit results will be considered in any subsequent updates. Any non-conformances will be promptly documented and resolved as required by **Section 7.3** and GG-04, “Identification of Non-conformances and Corrective/Preventive Action.”

7.2.3 ESHS Performance Measurements

After the initiation of the construction phase, the Project will conduct an annual evaluation of OHS hazards and risks, in accordance with GG-09, “Identification of Project-related Safety Hazards, and Assessment of Risks” Per GG-09, evaluated documents will include corrective and preventive action records generated for significant near-misses and/or accidents that occurred in the previous year, as well as the number of OHS training sessions conducted, the number of staff trained in comparison to the average annual employment level, and records of specific physical improvements to infrastructure made to correct OHS deficiencies or other OHS-related purposes. The results of this evaluation will form the basis of the OHS component of the performance improvement program described in **Section 4.2**, and will also be reported to management as part of the performance data required by the management review process discussed in **Section 7.5**.

7.3 Non-conformance Reporting and Corrective and Preventive Action

All Project staff are responsible for bringing suspected non-conformances, spills or releases of potentially hazardous wastes or materials, or other existing or potential emergency situations to the immediate attention of their supervisor or the Environmental Engineer or the Environmental or Health and Safety Officers, who will forward such information to the Environmental Manager for evaluation. In addition to the specific response actions that may be required by individual Management Plans or the current *Emergency Preparedness and Response Plan* (see **Section 6.0**), such situations will be promptly evaluated, documented, and thoroughly investigated, and appropriate management actions will be taken in accordance with the corrective and preventive action processes described in GG-04, "Identification of Non-conformances and Corrective/Preventive Action."

In addition to direct observation, the requirements of GG-04 will also be invoked for the resolution of non-conformances identified through external stakeholder communications (see **Sections 8.1** and **9.1**); periodic regulatory compliance verifications (see **Section 7.2.2**); annual internal ESMS audits (see **Section 7.4**); or external inspections or audits conducted by or at the request of regulatory agencies or other external stakeholders.

Non-conformances are defined as conditions that GGI can control or substantially influence that:

- are contrary to GGI's HSE and community relations policy commitments (see **Section 2.0** and **Appendix B**);
- can be classified as accidents or significant near-misses;
- violate a legal or regulatory requirement, or represent a worsening condition that could result in a violation if not corrected;
- could potentially result in negative environmental or social impacts; or
- represent a lack of conformance with this *ESMS Plan* or its supporting Management Plans and procedures.

If a non-conformance is judged to exist, Corrective/Preventive Action Requests (CPARs) will be initiated and tracked until closure in accordance with GG-04. CPAR documents and tracking logs are considered to be key ESMS performance records and will be maintained as described in **Section 7.1** and GG-05, "Records Management." CPAR information will be routinely evaluated, as appropriate, in the planning of regulatory compliance verification audits, internal ESMS audits (see **Section 7.4**), and management reviews (**Section 7.5**).

7.4 Internal ESMS Audits

After the start of the major construction phase, a comprehensive internal audit of the functionality and effectiveness of the ESMS will be performed at least every two years in

accordance with GG-33, “Internal ESMS Audits.” GG-33 is based on ISO 19011⁶, a combined environmental/quality management system auditing standard that is cited by both ISO 14001 and OHSAS 18001. Audit responsibilities will be assigned to properly qualified personnel and/or independent contractors or consultants who are functionally independent from the operational areas being audited. Additional audits may be performed at the discretion of GGI’s senior management. Any non-conformances detected in the audit process will be resolved in accordance with GG-04, “Identification of Non-conformances and Corrective/Preventive Action.”

7.5 Management Review

After the beginning of the major construction phase, an SOP will be developed to guide the performance of a comprehensive biannual internal management review of the overall suitability and effectiveness of the Aurora Gold Project ESMS, in accordance with GG-14, “Management Reviews.” Such reviews will involve the independent examination of several layers of environmental, social, and OHS performance information, developed through the routine implementation of this *ESMS Plan* and its supporting Management Plans and SOPs. This information will be assembled by or at the direction of the Environmental Manager, and will include:

- open and closed CPARs generated from the reporting of environmental, social, or OHS-related non-conformances, periodic regulatory compliance audits, monitoring trends or results, internal ESMS audits, or inspections or evaluations that may have been conducted by regulatory agencies, lending institutions, or other external organizations;
- known or potential environmental and social issues and the concerns of interested parties, as documented in current communication logs and supporting correspondence (see **Sections 8 and 9** and **Appendix B**, “Community and Environmental Grievance Procedure”);
- the current version of the AMP that addresses the projected scope of the next year’s mining and/or exploration operations (see **Section 4.3.1**);
- environmental, social, and OHS performance monitoring results, or other reports or information collected to assess progress towards the completion of specific mitigation measures or performance improvement actions;
- reports from previous management reviews conducted in accordance with this Section; and
- other pertinent information.

⁶ See ISO 19011:2002, *Guidelines for quality and/or environmental management systems auditing*; (International Organization for Standardization, 2002).

This information will be evaluated against the requirements of the current versions of GGI policy documents (see **Appendix C**) and the current regulatory requirements register (see Section 3.1). Any anticipated changes in regulatory compliance requirements, facility changes, organizational changes, or new directives that potentially affect the company's environmental, social, and/or OHS management practices will also be considered.

The management review will be documented in report format, and, as appropriate, will include specific recommendations for ESMS improvements, update of the AMP, external sharing or publication of annual monitoring report results, or other appropriate management actions. It will be presented to GGI's Chief Executive Officer (CEO) for final review and approval. Recommended performance improvement tasks will be documented that address any required *ESMS Plan*, Management Plan, or SOP updates; policy modifications; external communications; or other appropriate improvement actions.

If previously undetected non-conformances are observed in the management review process, they shall be documented and resolved as discussed in **Section 7.3**.

8 Stakeholder Engagement

8.1 Stakeholder Analysis and Engagement Planning

GGI's preliminary prospecting and exploration activities and the development of the original ESIA (ERM, 2010) have involved development of a detailed understanding of the unique characteristics of the stakeholder community that will be affected by the Aurora Gold Project. (ERM, 2010) recommended development of a social management plan prior to the initiation of major construction that focuses on:

- the management of artisanal miners, who may currently be found in small transient groups in the area of the Project;
- the management, and if possible prevention of the potentially unorganized influx of migrant workers and other transients seeking opportunities associated with the construction and operation of the mine;
- continuous engagement and consultation with the various stakeholder groups; and
- sponsorship of appropriately beneficial community development projects.

GGI will carry these themes forward in the development of two comprehensive Management Plans (the *Community Relations Management Plan* and *Influx Management Plan*), both of which will be managed within the context of this *ESMS Plan* and will also consider any additional social management issues that may arise in the anticipated final update of the ESIA (ENVIRON, 2013, in progress). The updated ESIA will also specifically consider and accommodate the

requirements of the January 1, 2012 version of IFC PS 1 (IFC, 2011), which are also reflected in the organization of this *ESMS Plan*.

Both the *Community Relations Management Plan* and *Influx Management Plan* will be developed, approved, and issued prior to the major construction phase, and will remain in effect over the life of the Project. General protocols for documenting and managing complaints from stakeholders will be managed in accordance with **Appendix B**, “Community and Environmental Grievance Procedure”, in order to ensure that any stakeholder complaints or inquiries detected are documented and brought to the attention of management and properly considered as the *Community Relations Management Plan* and *Influx Management Plan* are developed.

Several SOPs will also be issued in support of the *Community Relations Management Plan* and *Influx Management Plan*; these may include:

- GG-40, “Site Security”, which addresses general site security issues, as well as appropriate actions to be taken in direct encounters with individuals or groups engaged in ASM, illegal logging or hunting, or other activities that may occur throughout the mine life cycle;
- GG-35, “Community Health and Safety Awareness Meetings”, which may be invoked as the means of communicating specific health and safety concerns associated with Project activities; and
- GG-24, “Recognition and Reporting of Safety Hazards”, which will include guidance on reporting the proximity of planned activities to artisanal miners, indigenous groups, or other inhabitants or transients encountered in the Project area.

8.2 Disclosure of Information

As noted in **Section 8.1**, a comprehensive *Community Relations Management Plan* will be developed prior to the start of major construction that will incorporate the social management themes reflected in the initial ESIA (ERM, 2010), the updated ESIA (ENVIRON, 2013), and the January 1, 2012 version of PS 1 (IFC, 2011), including specific requirements for the disclosure of Project information. Should artisanal miners or other individuals be directly encountered in the field, SOP GG-40, “Site Security” requires that all such contacts be documented and appropriate hazard avoidance measures be implemented.

8.3 Informed Consultation and Participation

As noted in **Section 8.1**, a comprehensive *Community Relations Management Plan* will be implemented that will incorporate the social management themes reflected in (ERM, 2010), the updated ESIA (ENVIRON, 2013), and PS 1 (IFC, 2011), including specific requirements for informed consultation and participation. Pursuant to *Community Relations Management Plan* requirements, community information and consultation meetings will be periodically conducted. Should either community information and consultation meeting or any community health and

safety awareness meetings result in specific complaints or information requests, they will be documented and referred to management for appropriate follow-up in accordance with **Appendix B**, “Community and Environmental Grievance Procedure.”

8.4 Indigenous Peoples

As noted in **Section 8.1**, a comprehensive *Community Relations Management Plan* will be implemented that will incorporate the social management themes reflected in (ERM, 2010), the updated final ESIA (ENVIRON, 2013), and PS 1 (IFC, 2011). Based on the information provided, it is unlikely that the requirements of Section 32 of PS 1 (which require obtaining “Free, Prior, and Informed Consent”) will apply. However, should field encounters result in specific complaints or information requests, they will be documented and referred to management for appropriate follow-up in accordance with **Appendix B**, “Community and Environmental Grievance Procedure.”

8.5 Private Sector Responsibilities under Government-Led Stakeholder Engagement

Based on the information provided in (ERM, 2011) and updated ESIA (ENVIRON, 2013), it is unlikely that the requirements of Section 33 of PS 1 will apply, as stakeholder engagement is a GGI (not host government) responsibility.

9 External Communications and Grievance Mechanisms

9.1 External Communications

As noted in **Section 8.1**, a comprehensive *Community Relations Management Plan* will be developed prior to the start of major construction. The *Community Relations Management Plan* will incorporate **Appendix B**, “Community and Environmental Grievance Procedure” for the management of all external complaints and information requests.

9.2 Grievance Mechanism to Affected Communities

As also noted in **Sections 8.1 and 9.1**, a comprehensive *Community Relations Management Plan* will be developed prior to the start of major construction. The *Community Relations Management Plan* will incorporate **Appendix B**, “Community and Environmental Grievance Procedure” for the management of all external communications with affected communities, including those that constitute actual grievances.

10 Ongoing Reporting to Affected Communities

As many of the Management Plans discussed in Section 1.2 will not be fully implemented until GGI authorizes initiation of major construction, formal reporting to affected communities (i.e., Buckhall and Aranka Mouth) on the overall effectiveness of the Management Plans will occur at the end of the first year of major construction activities. Reporting requirements will be included in the Project *Community Relations Management Plan*.

11 References

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Appendix A Labour Grievance Procedure



GUYANA GOLDFIELDS INC. LABOUR GRIEVANCE PROCEDURE

1.01 This labour grievance procedure was developed to comply with the laws of Guyana, as well as to meet the requirements of the International Finance Corporation's (IFC) Performance Standard 2 on labour and working conditions. It is the mutual desire of the parties hereto that any problem, complaint or cause for dissatisfaction arising between the employee and employee or the Company with respect to the application, interpretation, or alleged violation of any Policy/Agreement be resolved as quickly as possible.

It is the duty of Guyana Goldfields Inc. ("the Company") to inform every employee upon being engaged regarding the labour grievance procedure. Staff will be trained regarding the labour grievance procedure.

Complaint Stage

1.02 It is generally understood that an employee who has a complaint shall first give his immediate Supervisor an opportunity to resolve the complaint or any other Senior Manager above that of the employee's immediate supervisor in the case where the matter concerns the said supervisor.

Should any complaint arise out of a dispute between the Company and any of its employees, an earnest effort shall be made to settle it before it becomes a grievance in the following manner.

1.03 When a complaint has been raised with an employee's immediate supervisor it is understood that the supervisor should take all the necessary actions to have the matter resolved within the first two (2) days of the said complaint. Five (5) days after the initial complaint the supervisor must respond either verbally or in writing to the employee or employees indicating what action has been taken in an effort to have the complaint resolved or settled.

1.03 Depending on the nature of the complaint or grievance, and should it involve a matter of general concern to all employees or may affect the administration, application or interpretation of company policies and procedures, the Company may post the relevant information on the various Notice Boards and other communication media, as deemed appropriate.

1.04 Failing any reply or a satisfactory settlement seven (7) days after the initial complaint, the employee may proceed to Stage I of the Grievance Procedure.

1.05 Except if an employee claims that he/she has been unjustly discharged, may submit a grievance and not a complaint either in writing or personally to the Country Manager, directly to Stage II of the Grievance Procedure within seven (7) days after the notification of his/her discharge.

Grievance

1.06 A grievance arises after a complaint has been made and no resolution or satisfactory settlement have been determined the employee would then become aggrieved and this may take several forms.

A grievance can be a difference between the Company and one or more of its employees to whom this procedure shall apply concerning the interpretation, application or non-application, administration or alleged violation of the provisions of the Company's policies and /or procedures.

Stage I

2.01 Failing a satisfactory settlement after the expiration of the five (5) days after the initial complaint has been made, within two (2) days thereafter, the employee may take the matter up with the Department Head, presenting the grievance in writing or in person.

The Department Head or his delegate shall reply in writing within four (4) days from the presentation of the grievance at the Stage I Level.

Stage II

2.1.1 Failing any reply or a satisfactory settlement within five (5) days after the grievance was heard at the Stage I, the employee may submit the grievance in writing or in person to the Country Manager or his/her delegate within the next three (3) days.

2.1.2 The Country Manager or his/her delegate shall convene a hearing with the parties within seven (7) days following the receipt of the written notice.

- 2.1.3 The employee may be accompanied at the hearing by any person he chooses amongst his peers.
- 2.1.4 The Department Head or his delegate may be accompanied by no more than one (1) other management representative and the Human Resources Manager.
- 2.1.5 The Country Manager or his/her delegate shall reply in writing to the Employee within four (4) days after the hearing at the Stage II.

Stage III - CONCILIATION

- 3.01 Failing a satisfactory settlement within five (5) days after the grievance was heard at the Stage II, the employee, may submit within the next seven (7) days, the grievance in writing for Conciliation to the Ministry of Labour or some other Conciliator agreed upon by the Company and the Employee.
- 3.02 The recommendation of the Conciliator shall in no case operate as an alteration, modification, amendment or supplementation of any provision or provisions of the Company's Policies.

Stage IV - ARBITRATION

- 4.01 Failing a satisfactory settlement at conciliation, the Company or the Employee shall give the other party written notice to reconsider the matter and reach a final settlement within thirty (30) days of the receipt of the notice. If however at the end of the thirty (30) day period it is clear that a settlement cannot be reached, then the matter may be referred by either party to the **Ministry of Labour for Arbitration**. The Ministry of Labour will recognize an Arbitrator selected and agreed to by the parties. If the Company and Employee do not agree on an Arbitrator, the Ministry of Labour will appoint an Arbitrator.
- 4.02 The award of such Arbitration/Tribunal shall be based upon the terms of reference agreed upon by both parties.
- 4.03 The Arbitration/Tribunal will present a written award within sixty (60) calendar days of the conclusion of the proceedings.
- 4.04 The findings of the Arbitrator as to the facts and as to the meaning or violation of the provisions of the Policies/Agreement shall be conclusive and binding upon all parties concerned. In no case shall the Arbitrator be
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authorized to alter, modify or amend any part of the existing Policy/ Agreement.

- 4.05** Arbitration shall be heard in Georgetown, unless mutually agreed otherwise.
- 4.06** In any arbitration, the written representations of the employee and the written reply (ies) of the Company, or in the case of a difference directly between the Employee and the Company, the written representation by the applicant for the arbitration and the reply thereto by the other party, shall be presented to the Arbitrator and the award of the Arbitrator shall determine the issues therein set out.
- 4.07** Expenses of the Arbitrator shall be borne in equal shares by the Employee and the Company.
- 4.08** Witness fees and allowances shall be paid by the party calling the witnesses.
- 4.09** The Arbitrator shall be requested to give his award within sixty (60) days after the closing of the hearing.

General Provisions

- 5.01** Paid Holidays, which are observed by the Company and the grievors', and his Supervisor's scheduled days off shall not be counted in determining the time limits within which action is to be taken in each of the Stages of the Grievance Procedure or under Section **5.02** of these general provisions.
- 5.02** Any and all time limits fixed by this Provision for the taking of action by either party or by any employee may at any time be extended by agreement in writing signed by the Country Manager and the Employee or their delegates.
- 5.03** The settlement of any differences under the Grievance Procedure shall be binding upon the Company, and the employee, or employees concerned.
- 5.04** It is agreed that the settlement of any grievance under the Grievance Procedure shall not be construed as a precedent, and shall not be binding on either party in respect of any other grievance.
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- 5.05** Each step to be taken under the Grievance Procedure (including any reference to arbitration) shall be taken by the party concerned within the time limits set forth or extended by mutual agreement or the matter shall be deemed to have been abandoned unless the employee concerned is unable to proceed due to illness.
- 5.06** If a grievance affecting an employee's rate of pay is finally settled in his favour, any adjustment shall be as a result of any agreement between the Company and the Employee.
- 5.07** In the event that two (2) or more employees have grievances, which are sufficiently common in nature that they may be conveniently dealt with together, such grievance shall be presented at Stage II of the Grievance Procedure. No more than two (2) of those employees in the group concerned may be present during grievance proceedings.
- 5.08** In the event that any difference concerning the interpretation, application or non-application, administration or alleged violation of this Procedure arises from.
- (a) Company and/or Employee;
 - (b) The absence of a decision on issues above, the matter may within seven (7) days be referred to the Ministry of Labour under **Section 4.1** of the Labour Act, **Chapter 98.01** by either party for the process of conciliation.
- 5.09** All time limits stipulated refer to calendar days.
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I - BREACHES RELATED TO SECURITY

		FIRST BREACH	SECOND BREACH	THIRD BREACH
1	Violation of traffic regulations on/off company property	Written Warning	3 to 5 days Suspension	Dismissal
2	Non observance of security regulations	Written Warning	3 to 5 days Suspension	Dismissal
3	To be in possession of alcohol in the work place	Dismissal		
4	To be in possession of narcotic drugs*	Dismissal		
5	Reporting for work under the influence of alcohol	3 to 5 days Suspension	Dismissal	
6	Testing positive for drugs	Dismissal		
7	Searching for gold on company property or being in possession of raw native gold or concentrates	Dismissal		
8	Hunting, fishing, or disturbing vegetation for choice woods, flowers, etc.	Dismissal		
* Note: *includes marijuana, 'cocaine, 'bad boys' cigarettes, Indian hemp				

II - BREACHES RELATED TO VIOLENCE AND INSUBORDINATE CONDUCT

		FIRST BREACH	SECOND BREACH	THIRD BREACH
1	Refusal to obey – Disobedience of lawful instructions	Written warning	Suspension	Dismissal
2	Insubordinate behaviour or attitude	Written warning	3 to 5 days Suspension	Dismissal
3	Use of threats, blackmail, or intimidation	3 to 5 days Suspension	Dismissal	
4	Fighting on the job	Dismissal		
5	Acts of Violence	Dismissal		
6	Threatening behaviour in any form	Written warning	3 to 5 days Suspension	Dismissal

III - BREACHES RELATED TO JOB PERFORMANCE

		FIRST BREACH	SECOND BREACH	THIRD BREACH
1	Absent from work place and/or absent from place of work	Written warning	3 to 5 days Suspension	Dismissal
2	Sleeping on the job	1 to 3 days Suspension	14 days Suspension	Dismissal
3	Unauthorized use of equipment	Written warning	3 to 5 days Suspension	Dismissal
4	Unsatisfactory performance	Written warning	Written warning	Dismissal
5	Horseplay	Written warning	14 days Suspension	Dismissal

IV - BREACHES RELATED TO PROPERTY

		FIRST BREACH	SECOND BREACH	THIRD BREACH
1	Negligence towards company equipment and third parties	3 to 5 days Suspension	Dismissal	
2	Failure to report damage to company property	Written warning	3 to 5 days Suspension	Dismissal
3	Fraudulent use of company documents	3 to 5 days Suspension	Dismissal	
4	Wilful damage to company property and third parties	Dismissal		
5	Falsification of, or knowingly making material omissions on forms, records, reports or application forms	Dismissal		
6	Unauthorized possession or removal of company's or employees' property.	Dismissal		

VII - IMPROPER CONDUCT

		FIRST BREACH	SECOND BREACH	THIRD BREACH
1	Gambling or playing games of chance for money or gain	Written warning	3 to 5 days Suspension	Dismissal
2	Distribution of literature on work site without authority	Written Warning	3 to 5 days Suspension	Dismissal
3	Sexual harassment or other unlawful harassment of another employee	3 to 5 days Suspension	Dismissal	
4	Improper behaviour in any form.	Written Warning	3 to 5 days Suspension	Dismissal

V - BREACHES RELATED TO THE IRREGULARITY AND PUNCTUALITY TO WORK

		FIRST BREACH	SECOND BREACH	THIRD BREACH
1	Absent without leave *	Written Warning	3 to 5 days Suspension	Dismissal
2	Absent without leave for 3 consecutive days or more **	Voluntary Termination of Service		
3	Late for work **	Written warning	1 to 3 days Suspension	Dismissal
<p>Notes: * Over a period of six (6) months ** Unless the employee can justify his absence or give good cause</p>				

VI - BREACHES OF SAFETY REGULATIONS

		FIRST BREACH	SECOND BREACH	THIRD BREACH
1	Violating safety or health rules or practices or engaging in conduct that creates a safety/health hazard	<u>Low stake</u> * - Written Warning <u>High stake</u> * - Dismissal	3 to 5 days Suspension	Dismissal
2	Entering restricted areas without approval	<u>Low stake</u> * - Written Warning <u>High stake</u> * - Dismissal	Dismissal	
<p>Note: Low stake = Minor accident with no injury and minor damage. High stake = Loss of life, major injury and/or actions which have the potential for same</p>				

Appendix B

Community and Environmental Grievance Procedure



COMMUNITY AND ENVIRONMENTAL GRIEVANCE PROCEDURE

1.0 INTRODUCTION

1.1 GUYANA GOLDFIELDS INCORPORATED

Guyana Goldfields Inc. is a Canadian based mineral exploration Company with advanced exploration projects in various stages of development and has been operating in Guyana continuously since 1996.

1.2 PROJECT SITES

Guyana Goldfields Inc.'s main project sites are located within the seventh administrative region, Cuyuni/Mazaruni of Guyana. Home to less than 1% of Guyana's population, the Cuyuni/Mazaruni area has been an important location for mining activity over the last few decades by artisanal miners.

1.2 COMMITMENT TO BEING A RESPONSIBLE CORPORATE CITIZEN

Over the last decade, Guyana Goldfields Inc. has quietly established itself as a very active corporate citizen in the areas of community development, literacy, health, environmental sustainability, and employee growth and employee social well-being. Guyana Goldfields Inc. believes that proactive corporate social responsibility constitutes the foundation for both successful exploration and sustainable development. As such, we will strive to ensure strong environmental management at every exploration stage, prospect, and mine site. In addition, proactive health and safety procedures, transparent interaction with local communities, and implementation of prudent expenditure and business performance will remain at the top of our priority list.

1.3 PURPOSE

The purpose of this document is to establish a straightforward community and environmental grievance procedure. This procedure takes on the role and responsibility of addressing grievances brought to the attention of Guyana Goldfields Inc. at the local level (Communities, local governments, local public & private sector, non-governmental organizations, and concerned individuals) related to Guyana Goldfields Inc. project sites.

1.4 OBJECTIVES

To ensure that formal grievances from the communities or others are promptly heard, analyzed, handled and answered by Guyana Goldfields Inc. It is our belief at Guyana Goldfields Inc. that the grievance procedure can be characterized as an early warning

system that is designed to handle concerns about a danger, illegality or wrongdoing within the organization that has the potential to harm the organization or harm others.

2.0 **grievance tools & organization**

2.1 **THE GRIEVANCE FORM (Attachment 2)**

The Grievance Forms will be maintained by Guyana Goldfields Inc.'s Corporate Social Responsibility team. These forms will be available at all of our project sites and within our Georgetown offices. At all of these locations the designated Company Representative in Grievance submission (i.e. Camp Managers, Health Safety & Environmental (HSE) Officers, Receptionist's, and CSR Department Team) will ensure that all of the fields in the form are filled out before submission to the CSR team. The CSR team will assign numbers to each Grievance form; document and appropriate actions to close out the grievance will be determined and written onto the form. The Grievance form will therefore capture the following information:

- (a) The full name of the person who reports the grievance (the Grievant) and the company representative who receives it;
- (b) The date the grievance was received and recorded on the Grievance Form;
- (c) A detailed description of the nature of the grievance;
- (d) A detailed description of the site location related to the grievance;
- (e) Date on which the Grievance Response Form was signed;
- (f) Details of the proposed corrective action and where relevant, the parties who were consulted in determining the most appropriate course of action;
- (g) Details of the corrective actions taken, identifying who carried these out and the date on which this occurred;
- (h) The dates on which the verbal response and the written response were provided to the grievant; and
- (i) The date the grievance was closed out.

The Grievant will be asked to sign and date the Grievance Response Form to confirm receipt/close-out of the Project response.

2.2 **THE GRIEVANCE REGISTRY**

Guyana Goldfields Inc.'s Grievance Registry will be maintained by the Corporate Social Responsibility (CSR) team. The CSR Manager is responsible for receiving, ensuring that the records are up to date, and that these grievances are documented in the Grievance Registry. This Grievance Registry contains all of the entered information about each community and environmental grievance registered with the company on a Grievance form. This is done with the purposes of keeping track of the grievance handling, ensuring grievances are responded to in a timely manner and for analyzing grievance trends.

2.3 GRIEVANCE FORM COMPANY REPRESENTATIVES

2.3.1 Georgetown Offices

The CSR Department is responsible for grievances once they are received. The CSR Department is located in the project management office within Georgetown. The company representatives that are trained to receive the grievances at our Georgetown offices are our Receptionists and CSR staff.

2.3.2 Field Project Sites

Most grievances are expected to be project site related and the Grievant can submit their grievance's with our field company representatives at our many project sites. The designated company representatives trained to receive grievances on site are our Camp Managers and Health Safety & Environmental (HSE) Officers.

2.4 CORPORATE SOCIAL RESPONSIBILITY (CSR) MANAGER

The Corporate Social Responsibility Manager reports to the Country Manager and is responsible for the following regarding the Community and Environmental Grievance Procedure:

- Entering the details of all Grievance forms into the Grievance Registry for tracking and analyzing trends;
- Monitoring and controlling the flow of Grievance Forms from the date the grievance is received to the date the grievance is finally closed out;
- Maintenance of the Grievance Registry and full responsibility for each stage in the grievance procedure; and
- Providing weekly reports at weekly Management Meetings, monthly reports to the Country Manager and annually reporting to the International Finance Corporation (IFC) in the Annual Environmental and Social Monitoring Report.

2.5 COUNTRY MANAGER

The Country Manager is accountable for all aspects of the grievance processing and handling process and reports to the Chief Executive Officer (CEO) and Board of Directors of Guyana Goldfields Inc. Specifically, the Country Manager is responsible for:

- Reviewing all grievance resolution recommendations submitted and determining what action if any will be taken to resolve any grievance;
 - Overall management of the Grievance procedure, with particular attention to ensuring responses to grievances are provided in a timely manner;
 - Oversight of the CSR Manager, with particular attention to ensuring that the Grievance Registry is kept up to date; and
 - Consulting with Regional and Governmental authorities when required in relation to large-scale community or environmental grievances directed to the company.
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3.0 THE GRIEVANCE PROCEDURE PROCESS

This section details the process that will be followed by Guyana Goldfields Inc. for processing and resolution of community and environmental grievances that have been submitted to the company and the handling of these grievances by the company. Please refer to Attachment 1, the GGI Grievance Procedure Flow Chart.

3.1 RECEIVING AND REVIEWING GRIEVANCES

3.1.1 Grievance Submission- Step 1

To begin the Grievance procedure process, a grievance form has to be submitted formally to the Company. To formally register a grievance, the Grievance Form provided as illustrated in Attachment 2 has to be filled out. Company representatives as detailed in Section 2.3 shall assist persons who are not able to fill out the form by themselves.

A properly completed Grievance Form must be submitted in order to register a community or environmental related grievance. Guyana Goldfields Inc. will not be required to consider any grievance that has not been submitted on a Grievance Form in accordance with this procedure.

The Grievant will be given a copy of the completed Grievant Form for his/her records, and will be notified of the date on which the Grievance Form was registered in the company's Grievance Registry.

3.1.2 Grievance Registry Recording

Completed Grievance Forms collected by the designated Company Representatives must be forwarded to the Corporate Social Responsibility (CSR) Manager upon receiving, as soon as possible.

On receipt of the Grievance Form, the CSR Manager will record the details of the Grievance Form into the Grievance Registry and ensure that the appropriate departments (e.g., Health, Safety & Environmental Department and Country Manager) have received copies of the Grievance Form.

3.1.3 Grievance Analysis and Review-Step 2

The CSR Manager and identified grievance related members in management will review all Grievance Forms for completeness of information. This review will involve both operational personnel and top management personnel to offer a broader scope of the issue. The preliminary recommendations will take into consideration Company policy, past experience, current issues and potential outcomes. After this review session, these preliminary recommendations will be made to the Country Manager in a timely manner for resolving each grievance.

3.2 GRIEVANCE RESPONSE DEVELOPMENT

3.2.1 Grievance Response Consideration-Step 3

The CSR Manager will develop a formal written response within 14 days of the date on which the Grievance Form was recorded in the Grievance Registry.

The formal written response will include the rationale behind the response and next steps and actions, if any, to be taken by Guyana Goldfields Inc. to resolve the grievance. The response will take into consideration the preliminary recommendations developed initially by the CSR Manager, operational personnel relevant management members and oversight by the Country Manager.

3.3 RESPONDING TO THE GRIEVANT

The verbal and written grievance response will be provided to the Grievant. The reasons for the response will be explained to the Grievant.

If the Grievant accepts Guyana Goldfields Inc.'s formal response, this decision will be documented with the Grievant signature on the Grievance Response Form, as described in Section 3.5 of this procedure. In this case, the Grievance Response Form will be returned to the CSR Department for recording into the Grievance Registry.

If the Grievant rejects Guyana Goldfields Inc.'s formal response, the process moves to Section 3.4 of this grievance procedure.

3.4 REJECTED RESPONSE BY GRIEVANT

If the Grievant rejects Guyana Goldfields Inc.'s formal response, the CSR Manager will have to inform the initial members of management involved in the review process and the Country Manager. This grievance will then have to go through a second review process in order to review the merits of the rejection and determine whether other avenues could be approached by the Company together with the Grievant, such as third party conciliation or consultation with community or other appropriate stakeholder groups.

During this second review process either another formal written response will be provided to the Grievant in 30 days or it may be decided to hold a meeting with Company representatives and the Grievant. Formal notes documenting the meeting will be issued and signed by the attending representatives. The outcomes of this meeting will be recorded, and if agreement is reached between the Company and the Grievant, the agreement will be captured on the Grievance Form (Attachment 2) with signature of the Grievant. The CSR Manager will proceed to Section 3.5 of this procedure.

If no agreement can be reached, then the Grievant can pursue other avenues (such as administrative or legal) at his/her discretion. The CSR Manager will proceed to Section 3.5 of this procedure for close-out.

3.5 COMPLETING ACTIONS AND GRIEVANCE CLOSEOUT-Step 4

Following the completion of action specified in the Grievance Response Form, photos and/or other documentary evidence will be collected by the CSR Department to form a comprehensive record of the grievance and how it was resolved.

Where the formal written response identified action that needed to be taken to resolve the grievance, the Grievant will confirm the work has been completed by signing the Grievance Response Form (Attachment 2). The CSR Manager will record the completion of the actions and the date of the signature of the Grievant into the Grievance Registry.

If no agreement can be reached with the Grievant, the Grievance Form will include the rationale for close-out and will be signed by the Country Manager. The CSR Manager will record the rationale and close-out decision into the Grievance Registry.

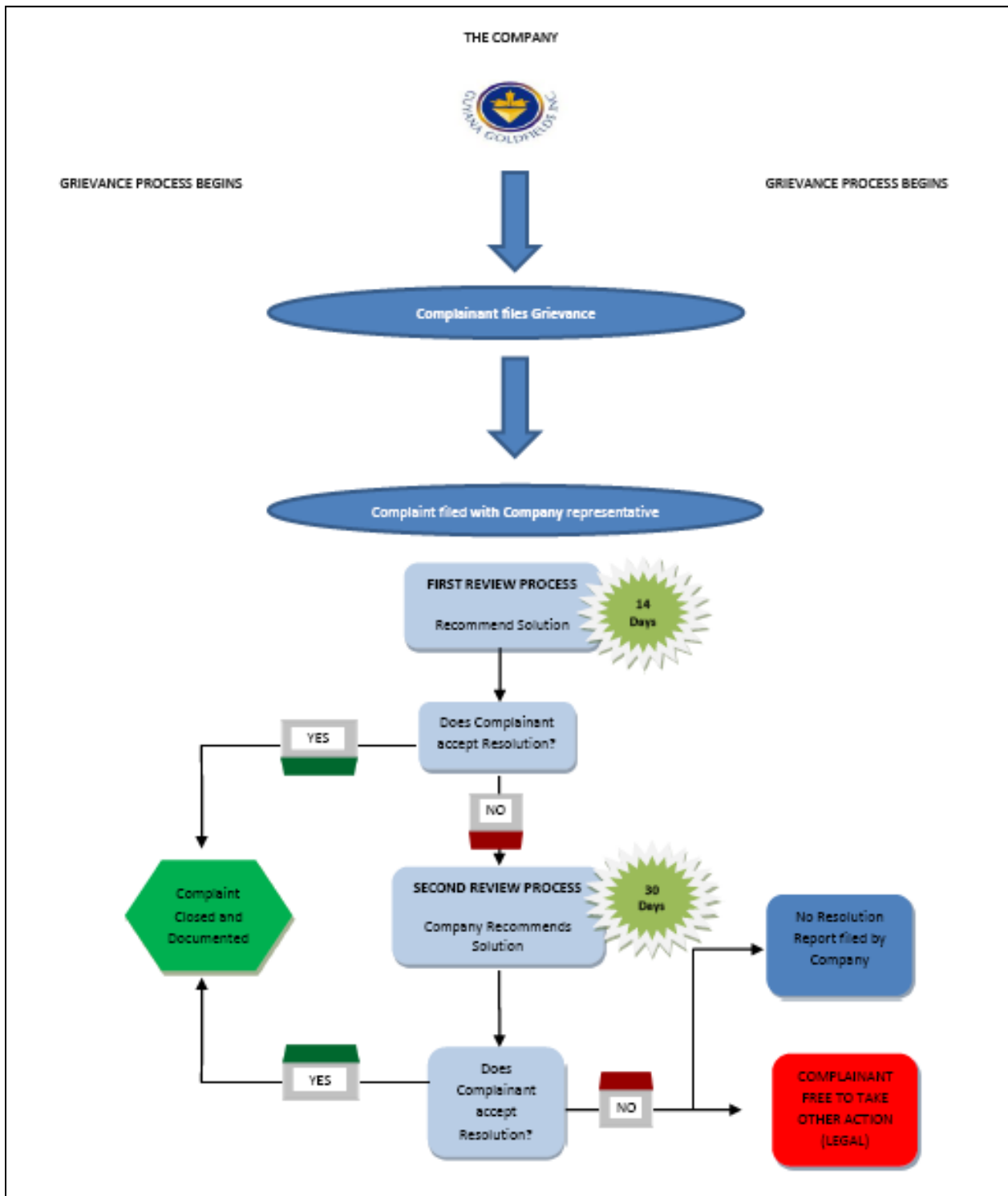
4.0 MONITORING AND COMPANY/ COMMUNITY FEEDBACK

The CSR Manager will prepare on a quarterly basis a summary grievance report to determine if there are any recurring grievances that point to a need for changes in company policies, procedures or activities.

The Country Manager will periodically review the adequacy of the grievance process procedure and agree modifications following consultation with members of the management team, the CEO and the Company Board of Directors.

The purpose of this review is to determine if there are any recurring grievances that point to a need for changes in Company policies, procedures, or activities.

Attachment 1: GGI Grievance Procedures Flow Chart



Attachment 2: GGI Community & Environmental Grievance Form



COMMUNITY & ENVIRONMENTAL GRIEVANCE FORM

GUYANA GOLDFIELDS INC is committed to providing opportunities for resolution of community and environmental grievances.

For our Company to adequately address your grievance, please provide as with as many specific details as possible in this form.

All formal complaints must be properly filled out on this form with the assistance of a Company Representative. Please contact the Corporate Social Responsibility Department if you require further assistance with this form.

NAME OF COMPLAINANT: TEL NO:

AGE:

SEX
M F

Contact Information (Address):

Town/Community:

DETAILS OF COMPLAINT/INCIDENT

COMPLAINT SHORT TITLE:

DATE:

PLACE OF INCIDENT (Address/Project Site/GPS Coordinates):

BRIEF DESCRIPTION/STATEMENT

If insufficient space please write on a separate sheet, sign, date and attach to this form

Signature (Complainant).....	Date
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Signature (CR Staff).....	Date
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PART 2: RESPONSE FROM COMPANY:

Does the claim proceed? YES NO

If NO, Give reasons:

Name of Person Logging the Incident:

Signature (CR Staff).....

Date

PART 3: VERIFICATION

PARTICIPANTS NAME	FROM	DEPARTMENT
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.....
.....
.....
.....

Person responsible for Technical Report

Date of Submittal of Technical Report Signature.....

PART 4: CORRECTIVE ACTIONS

Specify Corrective Action:

Date of Corrective Action:.....

ACKNOWLEDGEMENT OF CLOSURE TO GRIEVANCE

Signature (Complainant).....

Date

Signature (Company Rep.).....

Date

OTHER RECOURSE TAKEN

IF Complainant seeks further action (LEGAL), please provide details if known.

Appendix C
Human Resources, Community Relations,
and Environmental, Health, and Safety Policy Statements



GUYANA GOLDFIELDS INC. HUMAN RESOURCES POLICY

GUYANA GOLDFIELDS INC. makes the following commitments to its employees in order to promote an environment where employees work together to make it a successful company for the benefit of its Shareholders, Employees and other Stakeholders.

- To select individuals for employment on the basis of their qualifications, experience and past performance.
- To provide employees with information regarding their rights under national labour and employment law, including their rights related to wages and benefits.
- To afford equal opportunity at its locations to all employees and applicants for employment without regard to race, creed, color, national origin, religion, gender, sexual orientation or any other basis protected by international conventions, or national law.
- To show respect for the rights and dignity of each employee, sexual harassment will be neither sanctioned nor tolerated. In this regard, unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature made either explicitly or implicitly a term or condition of an individual's employment; the submission to or rejection of such conduct by an individual to be used as the basis for employment decisions affecting such individual; or such conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile, or offensive work environment.
- To not employ forced, bonded or child labour, and to respect National Law on minimum age for workers.
- To comply with the International Finance Corporation's (IFC) Performance Standard 2 regarding labour and working conditions.
- To compensate employees fairly and equitably based on the work performed and results produced.
- To establish a safe working environment, and administer a continuing safety program.
- To treat employees with consideration, understanding and respect, to give credit for good performance.



GUYANA GOLDFIELDS INC. HUMAN RESOURCES POLICY

- To allow employees the right to form and join workers organizations of their choosing without any interference or employment consequences and to bargain collectively with their employer.
- To encourage employees to use mechanisms provided to them to raise grievances and to discuss openly any issues of concern they might have and to respond to those grievances in a fair and transparent manner through the appropriate mechanisms in a timely manner.
- To provide interesting and challenging jobs, to encourage employees to increase and enhance their skills, and to provide opportunities for advancement with regard to the employees' desires, services and qualifications and the company's business needs.
- To communicate with employees regarding matters of mutual concern and benefits, and to promote on-the-job relationships in which two-way communications flow freely.
- To develop a plan to mitigate the adverse impacts of retrenchment on employees in anticipation of the elimination of a significant number of jobs or a layoff of a significant number of employees. The plan will be based on the principle of non-discrimination and will reflect the client's consultation with employees, their organizations and the government.
- To work to improve employment skills and competencies by regular performance reviews and undertaking education, training and coaching as appropriate.
- To guarantee acceptable standards and management of workers accommodation.
- To develop a grievance redress mechanism for workers (and their organizations) to raise reasonable workplace concerns. The workers will be informed of the existence of such mechanism at the time of hire. The mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides feedback to those concerned, without any retribution. The mechanism should not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.



GUYANA GOLDFIELDS INC. HUMAN RESOURCES POLICY

- To carefully select employees for leadership positions, and to provide them with the opportunity of keeping skills abreast of current technological developments and best practice.
- To empower employees to make decisions to the maximum of their abilities.



COMMUNITY RELATIONS POLICY STATEMENT - AURORA PROJECT

Guyana Goldfields, Inc. (GGI) will develop the mineral resources of the Aurora Gold Project in a manner that respects the applicable laws and regulations of the nation of Guyana, and, to the extent practicable, creates shared value with affected communities, residents, and other stakeholders. We recognize that Project success demands mutual respect, trust, and teamwork. We will therefore:

- Respect indigenous cultural values and human rights through ethical, transparent, and accountable business practices;
- Maintain clearly defined and open lines of communications with affected communities, residents, or other stakeholders, over the life the Project;
- Engage with affected communities, residents, and other stakeholders to identify potential social impacts, and to develop mutually agreeable strategies, plans, and procedures for managing any such impacts;
- Value local knowledge and capabilities, and give due consideration to these resources in our hiring, training, and supply chain contracting practices; and
- Conduct our mining operations in a safe and environmentally sound manner that minimizes impacts to local air quality, water resources, and biodiversity.

We will achieve these objectives by following clearly established practices and procedures that comply with applicable laws and regulations as well as the best practices of the international mining industry.

This policy will be communicated to GGI's workforce, consultants, and contractors, and to external stakeholders upon request.



ENVIRONMENTAL, HEALTH, AND SAFETY POLICY STATEMENT - AURORA PROJECT

Guyana Goldfields, Inc. (GGI) recognizes that a safe working environment is an entitlement of each member of our human resources. GGI is committed to fulfill this obligation by taking reasonable steps to ensure that Company operations, in both the office and the field, remains conducive to the continued health, safety and welfare of our personnel.

While conducting its activities, GGI is driven to maintain environmental integrity, and will seek to, execute its operations to either have no adverse impact on the environment or have minimal temporary impacts which can be alleviated through mitigating measures.

The Company has established an Environmental and Social Management System (ESMS) framework for the achievement of the company's health, safety and environmental goals and objectives, and is committed to periodically reviewing and updating the ESMS in order to ensure its appropriate and continued suitability.

Our company is also committed to ensuring that all operations are performed in compliance with local and international environmental and health and safety laws, regulations, policies, and codes of practice.

GGI places the highest priority on the safety and well-being of people, the preservation of property, and the protection of the natural environment.

The Management of GGI is mindful of its duty to care for all employees, clients, contractors and the general public at large. At the same time, GGI has recognized that employees are its most valuable assets and they are integral to the success of the Project. As such, the Company is committed to ensuring that its employees function in an atmosphere within which mutual respect and open communication are facilitated and welcome on an ongoing basis.

This policy will be communicated to GGI's workforce, consultants, and contractors, and to external stakeholders upon request.