LYDIAN INTERNATIONAL Amulsar Gold Mine Project Environmental and Social Impact Assessment, Chapter 4



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4.20 Stakeholder Engagement

Stakeholder engagement for the Amulsar Project was initiated in 2006 and has gradually become more formalised as the Project developed.

Full details of the stakeholder engagement approaches taken by the Project are defined in the Stakeholder Engagement Plans (SEP) in Appendix 8.6. This plan is a living document and is updated regularly (at least annually and most recently in May 2016).

The first SEP was developed in 2011 and subsequently disclosed in October 2011. Revisions of the SEP with immediate disclosure took place in September 2012, May 2013, June 2014 and January 2015. The latest version of this document is dated January 2016, available in English and Armenian, disclosed at the Amulsar Information Centre (AIC) in Gndevaz, the Geoteam office in Yerevan and on Lydian and Geoteam websites.

During the exploration, pre-feasibility and feasibility phases, the main aim of stakeholder engagement was to establish two-way communication between Geoteam and stakeholders at national, regional and local levels, to ensure stakeholder views were incorporated into the ESIA, the EIA and the Project design as it developed through feasibility studies, culminating with the November 2015 "Technical Report - Amulsar Value Engineering and Optimization" - which presents a final mine plan and layout. The SEP will now be continued to support the construction activities to be undertaken on site starting Q2/Q3 2016.

The SEP outlines how stakeholders have been and will be informed and consulted on the Project development activities and the impact assessment process, and the upcoming stages of construction. During the construction and operation phases, stakeholder engagement activities will focus on keeping stakeholders informed and receiving feedback about the Project activities, and engaging with them in terms of disseminating and discussing information on impacts, mitigation measures, monitoring and environmental management. Feedback on stakeholder concerns is received through a variety of mechanisms, including the AIC in Gndevaz, the community grievance mechanism, and ongoing engagement with communities through formal and informal consultation events and meetings.

All concerns raised are registered and tracked via the Geoteam Environmental and Social Management System (ESMS) using a stakeholder engagement database and the grievance mechanism (cf. chapter 10 of SEP) managed by the social development team. All questions, claims and grievances are considered by the Company management and/or respective



team/office and addressed through follow-up meetings and additional consultation events.

4.20.1 Information Disclosed

Geoteam has sought to provide stakeholders with information on a regular basis prior to engagement activities. The full list of meetings held until end of December 2015 is provided in the SEP (cf. Chapter 7 of SEP).

The EIA dated July 2014 prepared in Armenian language for the Mining Right application was publicly disclosed in August 2014. A new version of the EIA prepared in and disclosed in 2016 is available on the Geoteam website (http://www.geoteam.am/amulsar-project/environmental-impact-assessment.html).

The v9f ESIA documentation was published on Geoteam's website on 27 May 2015, with a link from the Lydian website also. The documents provided were:

- In English, the full ESIA comprising the Non-Technical Summary (NTS), the main text, the individual management plans that comprise the Environmental and Social Management Plan (ESMP), and the technical appendices; and
- In Armenian, the Non-Technical Summary (NTS), the main text, the SEP, the Land Access and Livelihood Restoration Plan (LALRP), and the Public Commitments Register (PCR).

A full set of ESIA documents in English was made available for viewing in printed form at Geoteam's Yerevan office. A set of documents excluding the technical appendices was made available at the AIC in Gndevaz. In both the Yerevan office and at AIC, printed versions of the NTS, main text, SEP and LALRP in Armenian were also provided.

The "Technical Report - Amulsar Value Engineering and Optimization" was disclosed in November 2015 on the Lydian website as well as on the Canadian Securities Administrators System for Electronic Document Analysis and Retrieval (SEDAR) website (http://www.sedar.com) as required for companies listed on the Toronto Stock Exchange (TSX).

This current ESIA v10 will be disclosed on the Lydian and Geoteam websites and through local disclosure events in Armenia (May 2016), with disclosure by the IFC and the EBRD on their websites as required by the relevant internal procedures.



Key disclosure events have included the following formal meetings during the iterative process of preparing EIA and ESIA reports:

- Public Hearing on Amulsar detailed EIA Report (Tigranes Open Pit), November 2009;
- Amulsar Open Pit Gold Project Scoping Report Armenia, February 2011;
- Public Hearing of the conceptual EIA on the exploration license "Khachakar", April 2011;
- Presentation of the Scoping Study results & the concept of the ESIA, baseline conditions and mine plan, May 2011 in each community (four in total);
- Presentation of the ESIA; summary of the results of the baseline studies completed; information available from the feasibility study, such as mine design, operating specifics and timelines, November 2011 in Gorayk and Jermuk;
- Public Hearing on the EIA of ore processing operations conceptual design (crushing, conveying, HLF and ADR), November 2011;
- Four Public Hearings of the detailed EIA on Artavazdes and Tigranes Open Pit and Waste Rock Dump, March to July 2012;
- Public Hearing of conceptual EIA on Heap Leach Facility, July 2013;
- Presentation of the ESIA; summary of the results of the baseline studies completed; information available from the feasibility study, such as mine design, operating specifics and timelines, July 2013 in Jermuk;
- Series of Working Group meetings held to discuss potential heap leach facility locations, July-September 2013 in Yerevan;
- Information meetings and focus groups with local residents in 2014 and 2015 to explain the land acquisition process in Gndevaz, the herders surveys and the biodiversity studies;
- For the EIA approval process as part of the Mining Permit application submitted to the Government in July 2014, two Public Hearings took place, the first in Gndevaz on August 25th and the second on September 27th in Gorayk. Geoteam received the final positive opinion from MNP on October 17, 2014;
- ESIA v9f pre-disclosure meeting in Yerevan on October 30th, 2014 with a good representation of civil society organizations (CSOs);
- ESIA v9f disclosure meetings in Jermuk, Gndevaz, Saravan, Goryak and Yerevan in June and July 2015; and
- A combined EIA Public Hearing and ESIA information meeting in Gndevaz on December 17th, 2015 to inform all local stakeholders about the restart of the EIA and

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ESIA preparation.

The public disclosure of the ESIA v10 is scheduled at the end of May and early June 2016.

The most recent documents related to Geoteam's environmental and social management, feasibility-value engineering work and ESIA preparation are located on the Geoteam website (http://www.geoteam.am/en/reports/technical.html).

All stakeholders should note that potential impacts and mitigation measures have changed over time as the Project design and impact assessment have developed and evolved and in response to feedback from stakeholders.

4.20.2 Stakeholder Issues

The SEP (see Appendix 8.6) provides a summary of common stakeholder issues raised during recent consultation events during the disclosure on ESIA v9f in mid-2015, and during regular engagement, respectively. During the consultation events the issues, concerns and questions presented are collated from various consultation events, letters received from stakeholders and regular monitoring of public opinion about the Project. Responses raised during the consultation events have also been recorded and these can be reviewed in the SEP.



4.20.3 ESIA Disclosure and Engagement Planning

In the first and second quarter of 2016 there will be public consultation events in the four local communities and in Yerevan with NGOs, CSOs and respective government authorities:

- First information meetings in Gndevaz, Saravan, Goryak and Jermuk for ESIA disclosure availability;
- Post-disclosure ESIA Roundtable in Yerevan organized with NGOs;
- Information meeting on ESIA in Yerevan with local representatives of IFIs, Embassies,
 International Organizations and business partners;
- Focus-group discussions in the Project area and in Yerevan on specific issues as deemed necessary;
- Post-ESIA Disclosure Consultation Meeting in Gndevaz, Saravan, Goryak and Jermuk;
 and
- Additional ESIA disclosure and information meetings as required by stakeholders.

