



## Environmental & Social Management System Stakeholder Engagement Management Plan

<b>Stakeholder Engagement Management Plan</b>		
Effective Date: 06.06.2016	Document Number: Gatsuurt-SEP-Ver. 1	Rev: 1

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## ACRONYMS AND ABBREVIATIONS

<b>Acronyms and Abbreviations</b>	
<b>BGC</b>	Boroo Gold Company
<b>CBO</b>	Community Based Organisation
<b>Centerra</b>	Centerra Gold
<b>DEIA</b>	Detailed Environmental Impact Assessment
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EIA</b>	Environmental Impact Assessment
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMP</b>	Environmental and Social Management Plan
<b>MEGD</b>	Ministry of Environmental and Green Development
<b>NGO</b>	Non-Government Organisation
<b>SEP</b>	Stakeholder Engagement Plan

## GLOSSARY OF TERMS

<b>Glossary of Terms</b>	
<b>Consultation</b>	The process of gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
<b>Dialogue</b>	An exchange of views and opinions to explore different perspectives, needs and alternatives, with a view to fostering mutual understanding, trust and cooperation on a strategy or initiative.
<b>Community Based Organisations</b>	Organisations that are established by communities and comprise community members. Examples of CBOs include farming cooperatives.
<b>Corporate Social Responsibility</b>	A concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders.
<b>Community social investments</b>	Community social investment is business involvement in and commitment to social initiatives to meet the needs of communities in which they operate. It provides a way for companies to demonstrate a commitment to acting responsibly and making a positive contribution to society. It includes forms of support aimed at institutional and capacity building activities important to a community's overarching economic and social development. Support may include a mix of civil society aspects, strategic community partnerships, education and training, business and enterprise development, among others, with the intention to bring benefits to stakeholders over and above an operation's core activities. The beneficiaries can range from local to national and international stakeholders.
<b>Engagement</b>	A process in which a company builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. This is part of a broader

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	"stakeholder engagement" strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the project.
<b>Environmental and Social Impact Assessment</b>	An assessment comprising various social and environmental studies which aim to identify project impacts and design appropriate mitigation measures to manage negative impacts, and to enhance positive project impacts.
<b>Life of Mine</b>	Number of years that an operation is planning to mine and treat ore, taken from the current mine plan.
<b>Livelihoods</b>	The financial and/or subsistence activities undertaken by households to meet their daily needs. Typically, rural households undertake multiple livelihood strategies that include subsistence farming and informal trading.
<b>Local communities</b>	Refers to groups of people living in close proximity to a project that could potentially be impacted by a project. ("Stakeholders," in contrast, refers to the broader group of people and organisations with an interest in the project.)
<b>Non-Government Organisations</b>	Private organisations, often not-for-profit, that facilitate community development, local capacity building, advocacy, and environmental protection.
<b>Partnerships</b>	In the context of engagement, partnerships are defined as collaboration between people and organisations to achieve a common goal and often share resources and competencies, risks and benefits.
<b>Project Area</b>	A geographical area within which direct and indirect impacts attributable to a project can be expected. Typically, a Project Area is (i) unique to a project (ii) larger than the actual footprint of a project; and encompasses socio-economic issues and impacts, as well as issues and impacts associated with other disciplines (e.g. environment, health and safety). Defining the Project Area is used to determine a project's area of influence and responsibilities. It also provides guidance on the area within which impacts need to be monitored, and managed, and it also assists with defining project stakeholders that should be engaged during an ESIA process.
<b>Stakeholder</b>	Any group or individual who can affect, or is affected by a company and its activities.
<b>Stakeholder Engagement Plan</b>	A plan which assists managers with effectively engaging with stakeholders throughout the life of the mine and specifying activities that will be implemented to manage or enhance engagement.

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## 1 INTRODUCTION

### 1.1 Background

Centerra Gold Inc. (Centerra) owns 100% of the Gatsuurt Project through its wholly owned subsidiary Boroo Gold Company (BGC). Centerra has been publicly listed on the Toronto stock exchange since 2004. The company objective is to deliver shareholder value, while also demonstrating leading performance and commitment to corporate responsibility across its operations including in Mongolia. The Gatsuurt Project is located 35km from the Company's Boroo Gold Mine which commenced production in 2004 and completed mining in 2012. Processing is being completed of the remaining stockpiled ore at the Boroo Gold site. Gatsuurt is connected to the Boroo mine site by a 55km road, which was commissioned by agreement with Mandal soum and completed in 2010.

Centerra is seeking Project financing from the European Bank for Reconstruction and Development (EBRD) for the development of the Project. Centerra is required to conduct an Environmental and Social Impact Assessment (ESIA) in order to secure financing for Project development. The Project also therefore needs to meet the EBRD Performance Requirements for environmental and social sustainability.

This preliminary SEP has been prepared on behalf of Centerra by Sustainability Pty Ltd. It is submitted as part of the disclosure package to the EBRD, along with the ESIA reports for the Gatsuurt Project. This preliminary version of the SEP is an initial guide to engagement and will be revised (i.e. a Final SEP issued) by Centerra prior to commencing the construction phase of the Project, and thereafter, throughout the Project to inform ongoing stakeholder engagement through the various stages of the Project operation, and closure / rehabilitation. As such this SEP is a "living" document that requires ongoing review in order to maintain its currency and applicability with reference to Project stakeholders.

### 1.2 Objectives and Scope

This SEP applies to all Gatsuurt operations including contractor activities. It seeks to define a technically and culturally appropriate approach to consultation, disclosure, and the management of grievances. The goal of this SEP is to improve and facilitate decision-making and create an atmosphere of understanding that actively involves Project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns about the Project.

The specific objectives of this SEP are to:

- Define the Project area;
- Identify and map Affected Parties and other interested stakeholders, and how they may be affected by or interested in the Project;
- Conduct stakeholder analysis to understand Project stakeholders and their patterns of interaction and groupings, so that appropriate methods and tools to engage them can be developed;
- Provide an action plan for consultation that allows for meaningful stakeholder input into the Project;
- Build long-term relationships between Centerra and the local communities;
- Ensure stakeholders have access to information on Centerra Project activities in a timely manner;
- Ensure information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend;
- Ensure that vulnerable and disadvantaged groups, are identified and that practical measures are implemented to include them in ongoing consultation;
- Establish clear mechanisms for managing stakeholders' questions, concerns, and grievances and provide appropriate conflict resolution processes;
- Manage expectations among communities and other stakeholders; and
- Document formal consultation and disclosure activities, and define the stakeholder tracking and records management system.

### 1.3 Overlaps with Other Management Plans

This Management Plan is part of the overall suite of management plans developed for the Gatsuurt Project. The Safety, Health and Environmental Management System (SHEMS) framework in place at the Boroo Gold Mine is currently being adapted and applied to the Gatsuurt Project to include the management of SHE and social aspects, commitments and Community Relations (CR) functions. A series of Standard Operating Procedures (SOPs) underlay the management plans and provide instructional description for key controls and monitoring methods.

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This SEP has key overlaps with the Community Development Plan; the Traffic Management Plan; the Community Health Safety and Security Management Plan, the Local Employment and Training Management Plan; the Procurement and Supply Chain Management Plan; the Security Management Plan; and the Cultural Heritage Management Plan.

#### **1.4 Authority and Management**

This Management Plan is owned by the Gatsuurt General Manager. It will be reviewed at a minimum bi-annually (every six months) during construction and early operation, and thereafter annually, to determine whether any changes or updates are required to reflect changing Project design or procedures.

Any requests for changes to this Management Plan must be addressed to the owner of this management plan and will be subject to appropriate review and approval processes.

## **2 PROJECT CONTEXT**

### **2.1 Project Location and Social Setting**

The Gatsuurt Project is located in the Khentii Mountain range valley, 90km north of Ulaanbaatar and 14km west of Tunkhel village in Mandal soum of Selenge aimag. Figure 1 shows the Project Location. Centerra owns 100% of the Gatsuurt Project, located 35km from the Company's Boroo Gold Mine. Under the current plan for Gatsuurt, the Company expects to process gold ore through the existing Boroo facility in the first two and a half operating years of the Gatsuurt Project. The Company plans to mine the ore at Gatsuurt and truck it to the existing Boroo mill to be processed. The roads connecting Gatsuurt and Boroo and mine access roads as well as mine facilities at both sites were completed in 2010.

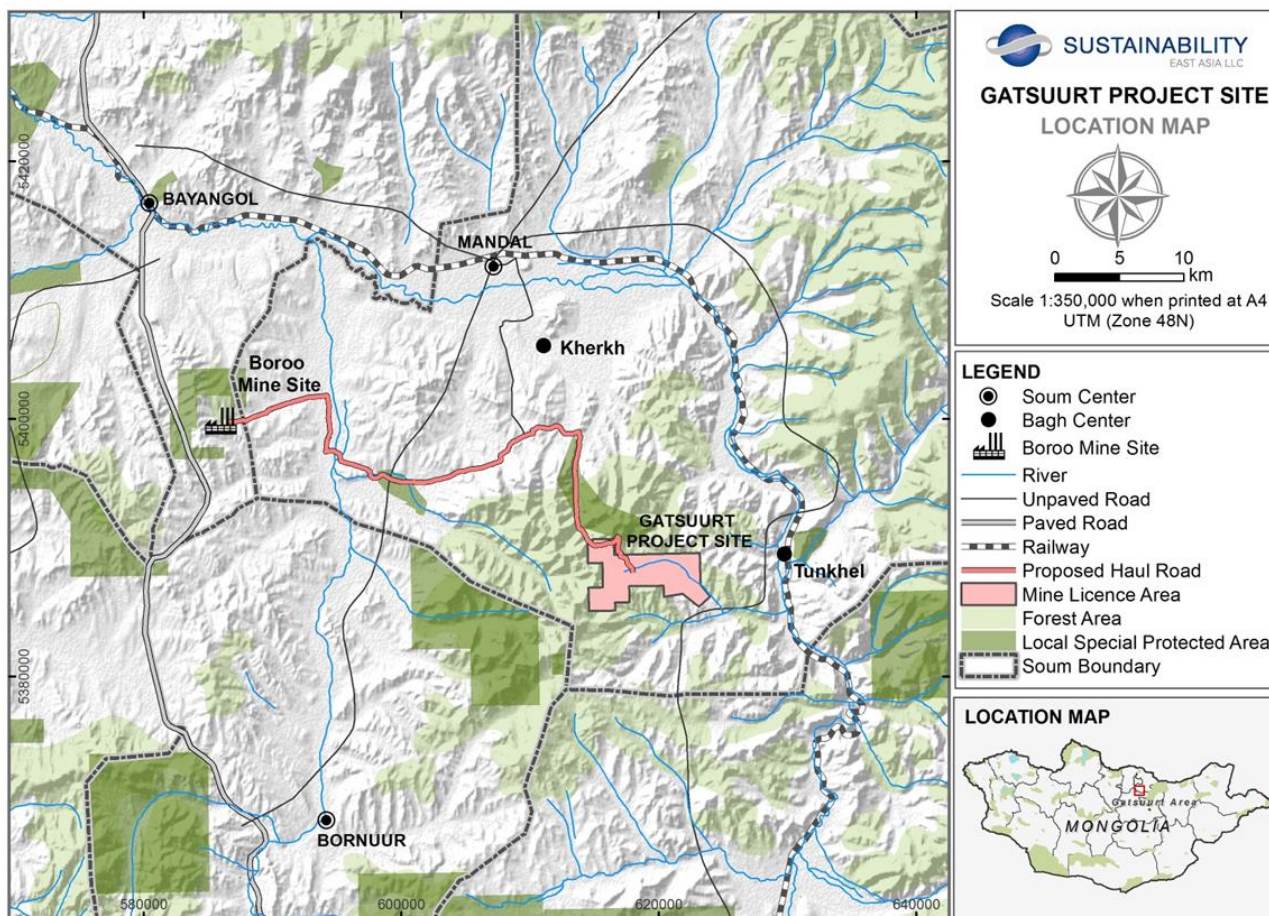
The Project is located in Selenge aimag in Mongolia's mountainous northern region. The centre of the aimag is Sukhbaatar city, which is 321km from Ulaanbaatar by paved road and railway. Selenge's main sector is agriculture, and is a provider of a significant portion of the country's agricultural land. Sukhbaatar city is also a key development axis due to the railway and main highway which pass through it on the way to the Russian border.

Mandal soum centre is located 220km from the Selenge aimag capital city, Sukhbaatar, and 174km from Ulaanbaatar city. Mandal soum's capital is Zuunkharaa. Kherkh bagh centre is around 5km from Zuunkharaa, while Tunkhel bagh centre is around 44km by unsurfaced road to the south east of Zuunkharaa. The soum consists of prime agricultural and cropping land. Furthermore, 70% of the soum territory is covered by forest land, which supports the forestry industry in Mandal.

Bayangol is located 156km from Ulaanbaatar, 75km from Darkhan-Uul aimag and 170km from the aimag centre. Similar to Mandal soum, Bayangol is a prime agricultural area, and is connected to Ulaanbaatar, Darkhan and Selenge by a paved road and railway.

**Figure 1 Gatsuurt Project Location**

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## 2.2 Project Area

The Gatsuurt Project area has been defined as the area in which a direct or indirect impact on the socio-economic or cultural environment might occur. This includes Selenge *aimag's* *soums* of Mandal and Bayangol, with a particular focus on Tunkhel *bagh*. See Table 2 in Section 5.1.1 for further description of communities in the Project area.

## 3 ROLES AND RESPONSIBILITIES

### 3.1 Key Roles and Responsibilities for SEP Implementation and Monitoring

Principal roles and responsibilities for the implementation of this plan are outlined below.

**Table 1 Key Roles and Responsibilities**

Role	Responsibilities
<b>Gatsuurt General Manager</b>	Ensure Project compliance with the Project Standards and other requirements set out in this Plan. Approve this Plan and the resources required for implementation.
<b>Gatsuurt Director External Relations and Sustainability</b>	Overall responsibility for Plan scope and implementation. Develop, monitor and revise this Plan.
<b>Community Relations Supervisor</b>	Timely implementation of this Plan, including coordination with implementing organisations and other stakeholders. Plan implementation.

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<b>Role</b>	<b>Responsibilities</b>
<b>Community Liaison Officers</b>	Coordinate and manage the day-to-day activities for stakeholder engagement, as directed by the Community Relations Supervisor
<b>Contractors</b>	<p>Ensure all assets under their control comply with Gatsuurt policies and procedures.</p> <p>Supply certification and/or license in accordance with statutory requirements.</p> <p>Comply with Gatsuurt's requirements for social impact management.</p> <p>Report all actual and potential social impacts to relevant supervisor or managing body.</p> <p>Report all complaints and stakeholder engagement activities undertaken by the contractor or its subcontractors to the managing body.</p>
<b>Employees</b>	<p>Minimise the impact of their activities on the environment wherever practical and reasonable.</p> <p>Comply with the obligations outlined in this Management Plan, as well as any other relevant Gatsuurt environmental and social policies and procedures.</p> <p>Report all actual and potential environmental and social impacts to relevant supervisor or managing body.</p>

#### **4 PROJECT STANDARDS**

Centerra will develop the Gatsuurt Project to meet or exceed the legal and regulatory requirements of Mongolia, in a manner consistent with international best practice. The key regulations and standards relevant to stakeholder engagement are:

- All applicable Mongolian Government requirements and international treaties that Mongolian Government is a signatory;
- Centerra policies and standards;
- EBRD Performance Requirements (2014)<sup>1</sup>; and
- Gatsuurt Project ESAP and other commitments.

##### **4.1 Applicable Mongolian Legislation**

The key provisions for stakeholder engagement in Mongolia are contained within the following laws:

- **Law on Environmental Impact Assessment (In force in 1998, amended 2001, 2006, and 2012):**  
The main implication of the law for the public is found within the public participation regulation, where project proponents are required to undertake a range of consultation activities, and must consider concerns and issues raised through this consultation in the design of their projects.
- **Minerals Law (In force on June 26, 2006):**  
The Minerals Law stipulates that a license holder shall work in cooperation with the local administrative bodies and conclude agreements on issues of environmental protection, mine exploitation, infrastructure development in relation to the mine-site development and jobs creation. The license holder may organise a public forum in relation to those issues, in cooperation with the local administrative agency. The local citizens may elect a representative whose obligation is to provide public monitoring on the license holder's activities.

<sup>1</sup> See <http://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>



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## **4.2 Applicable International Standards and Guidelines**

### **4.2.1 The European Bank for Reconstruction & Development**

The EBRD is committed to promoting environmentally sound and sustainable development in accordance with its Environmental and Social Policy (May 2014) and the Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement. EBRD sets out their stakeholder engagement requirements in the following documents:

- Environment and Social Policy (2014);
- Public Information Policy (2014); and
- PR 10 Information Disclosure and Stakeholder Engagement (2014).

The EBRD considers public consultation and stakeholder engagement as an on-going process, to be started at the earliest stage of the environmental and social impact assessment process, and to be continued throughout the entire life of the EBRD-financed project.

An essential element in the stakeholder engagement process, in order to ensure meaningful and effective consultation process, is the careful identification of all involved stakeholders and the examination of their concerns, expectations and preferences. Special attention should be paid to the identification of vulnerable stakeholders whose life and well-being is directly dependant by the Company's activities. The consultation and dialogue with these stakeholder groups need to be planned and managed with special care.

Furthermore, the EBRD requires that the project sponsor establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints and concerns are received, handled and resolved effectively, in a prompt and timely manner.

Maintaining close interaction with the local community and promoting its development should be an essential element of corporate policies and activities of all companies borrowing through the EBRD. Even if there is no explicit requirement for social investment activities, they are encouraged.

## **4.3 Applicable Centerra Standards**

Centerra has been publicly listed on the Toronto stock exchange since 2004 and operates within its Guiding Principles in undertaking all activities, which includes those in Centerra's capacity as 100% owner of the Gatsuurt Project. At the highest level, Centerra applies its Directors Code of Ethics, and has adopted certain practices and procedures to ensure that effective corporate governance practices are followed and that the Board functions independently of management.

Company policies guiding the company's interactions with the communities in which it operates include Corporate Responsibility Standards and Guidelines that define commitments in key issue areas and require that all Centerra projects and operations will assess the identified risk areas and drivers for their business and take steps to meet the commitments therein.

## **4.4 Other industry Guidelines with which Gatsuurt has Committed to Comply**

Centerra has committed to implementing the key principles of inclusive and effective engagement as defined by the International Finance Corporation in their publication *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*, as follows<sup>2</sup>:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, language, timeframes and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;

<sup>2</sup> International Finance Corporation. 2007. *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*

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- Inclusiveness in representation of views, including people from different age groups, sex, gender, vulnerability and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people's concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or programs design and reporting back to stakeholders.

The company has also committed to corporate responsibility across its operations through:

- Participating in the Extractives Industry Transparency Initiative (EITI) in its countries of operation: Mongolia and Kyrgyzstan;
- Public disclosure through the Global Reporting Initiative (GRI), applying the G3 Index and the Mining and Metals Supplement;
- Adoption and implementation of the World Gold Council's Conflict-Free Gold Standard;
- Being a signatory to the Cyanide Code, the international standard in cyanide management, as both a gold miner and a cyanide consignor/transporter; and
- Adopting and implementing the Voluntary Principles on Security and Human Rights.

## **5 STAKEHOLDER IDENTIFICATION, ANALYSIS & METHODS OF ENGAGEMENT**

### **5.1 Stakeholder Identification and Analysis**

The goal of stakeholder analysis is to identify each stakeholder group, describe their role and responsibility in the Project, present the opportunities for involvement with these stakeholders and outline possible risks for engagement. It is important to conduct an inclusive stakeholder analysis, however there is a level of prioritisation according to levels of impact, influence and interest in the Project.

The Gatsuurt Project has identified the following main stakeholder groups, and each of these groups is discussed in greater detail below:

#### **External Stakeholders:**

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- Impacted communities;
- Herders
- Vulnerable groups;
- Government officials and local authorities;
- National and international NGOs and CBOs;
- Labour unions;
- Business Associations
- Institutions and academia;
- Media;
- Lenders;
- Suppliers / businesses;
- Artisanal miners.

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**Internal Stakeholders:**

- Project personnel;
- Contractors;
- Services and Suppliers.

The directly affected communities in the Project area include the soums of Mandal and Bayangol, with specific reference to Tunkhel bagh and those rural (nomadic and semi-nomadic) households living near the mine site and in the vicinity of the Gatsuurt haul road. Within this primary area of influence some communities will experience more direct impacts (positive and negative) as a consequence of their vicinity. The following stakeholders have been identified as being directly affected:

**Table 3 List of Settlement Directly Affected**

Settlement	Type	Population	Distance to Gatsuurt site	Distance to Boroo site
Baruunkharaa	Bayangol soum centre	5,594 (1,675 households)	76.4km by improved road	32.8km by improved and paved road
Zuunkharaa	Mandal soum centre	25,693 (7,382 households)	39.2km by improved road	49.4km by improved road
Tunkhel bagh	Bagh centre of Mandal soum	3,234 (923 households)	Approx. 70km by improved dirt road (via Zuunkharaa) / 18km via unimproved track (via Balj river)	Approx. 90km by improved dirt road (via Zuunkharaa)
Rural herder households	Seasonally nomadic and semi-settled households	49 (18 households)	Various (<1 to 100km)	Various (<1 to 100km)
Artisanal miners <sup>3</sup>	Formal and informal artisanal miners operating in the project area	Variable	Various	Various

Table 4 provides further detail on the stakeholders and other key affected parties identified by Centerra.

**Table 4 Stakeholders and Other Key Affected Parties**

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
Government (National)	Ministry of Mining  Ministry of Nature, Environment and Green Development. (including National Agency of Meteorology, Hydrology and Environmental Monitoring; Water Authority)  Ministry of Health  Ministry of Construction and Urban Development (Administration of Land Affairs,	National mineral exploitation policy and issue of licences for mineral exploitation  Land rehabilitation National environmental and water policies. Oversight of monitoring and enforcement Functions:  Protection of employee and public safety  Land-related issues

<sup>3</sup> This does not include Trespass and Illegal Miners (TIM), who are subject to separate measures, outlined in the Social Management Plan.

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	<p>Geodesy and Cartography), Ministry of Industry and Agriculture</p> <p>Minister for Road and Transportation (Including State Railway Authority; Department of Road Transportation)</p> <p>Ministry of Justice (Office of Immigration, Naturalization and Foreign Citizens)</p> <p>Ministry of Education and Science State Agency of Professional Inspection including: Department of Environment, Tourism, Geology and Mining Inspection; And Department of Construction and Infrastructure Inspection etc. Police.</p>	<p>Transport related issues</p> <p>Regulation foreign workers Cultural heritage protection</p> <p>Oversight of monitoring and enforcement functions</p>
Government (Regional / Local)	Aimag, Soum and Bag) legislative and executive 'branches at all levels; and Citizens Representative 'Khural' (CRK)	<p>Permitting and statistical reporting for natural resource managements</p> <p>Establishing various kinds of protection zones (e.g. water protection zones)</p> <p>Determine annual limits on the use of natural Resources (Aimag and Soum)</p> <p>Implementation of EIA-related management actions is supervised by the Aimag. Soum and Bag governors and CRKs and checked/enforced by the Inspectorate Socio-economic development</p>
Non-Governmental Organisations / Community Based Organisations	<p>Tunkhel Kazakh; Itgelin ug; Ninja Miners Cooperative; Forest Protectors; Tunkheliin Ugluu NGO; "Let's Save Noyon Mountain" Movement;</p> <p>International NGOs;</p> <p>Informal Herders Groups (Soum and Bag levels)</p> <p>Soum Association of Pasture Users groups; Artisanal Miners Associations</p>	<p>These groups include current or potential partners of the Project or that have an advocacy interest in the Project. There are numerous international and national NGOs interested in or already involved with the Project, some with local representation.</p>
Other interest groups, including institutions and academia, etc.	Academy of Sciences (archaeologists, chemical engineers); Institute of Archaeology; and Mongolian National University.	<p>Issue-specific interest based on area of expertise, including management of impacts.</p> <p>Provision of advisory services to the Company in area of expertise. National opinion makers.</p>
Local and international media	<p>Broadcasting media:</p> <p>TVs: Mongolian National Broadcaster &amp; TV9 channel, MN 25, TV5</p> <p>- Radio station: FM 101.5 station "My homeplace" &amp; Mongolian National Radio Station</p>	<p>Interest in Project-related activities in the area, including management of impacts. Media have the potential to influence Company reputation. Media are also potential local partners in providing forums for the company to communicate with stakeholders).</p>
Political parties	Leaders of key political parties represented in Aimag and Soum CRKs	Economic and social development.
Communities	<p>Elected representatives / community 'leaders</p> <p>Elders Committee</p> <p>Local Residents</p> <p>Herders</p> <p>Artisanal mine workers</p>	<p>Environmental quality, land acquisition (if needed) and compensation, construction traffic; jobs and other economic benefits; social / community investment opportunities / initiatives</p>
Businesses and their associations	Chamber of commerce / association of entrepreneurs etc.	<p>Business opportunities</p> <p>Potential Impacts on their operations</p> <p>Cumulative impacts</p>
Internal Stakeholders	Project Personnel; Contractors; Services and Suppliers	Ongoing employment / contracts.
Labour / trade unions	Labour / trade unions	Retrenchment, training, health and safety, migrant workers etc., issues / compensation.

## 5.2 Stakeholder Engagement Methods

All engagement will proceed on the basis of what is culturally acceptable and appropriate for each different stakeholder group. A variety of engagement techniques will be used to build relationships with stakeholders,

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gather information from stakeholders, consult with stakeholders, and disseminate Project information to stakeholders. Table 5 below summarises the engagement techniques and provides the key consultation methods for the stakeholders.

**Table 5 Engagement Techniques**

<b>Engagement Technique</b>	<b>Most Appropriate Application of Technique</b>	<b>Stakeholder Group</b>
Information Centre and Information Boards	<ul style="list-style-type: none"> <li>Establish Information Boards in each Project area community.</li> </ul>	<ul style="list-style-type: none"> <li>Affected communities.</li> <li>NGOs and CBOs</li> </ul>
Phone / email / text / instant messaging	<ul style="list-style-type: none"> <li>Distribute Project information to government officials, organisations, agencies and companies.</li> <li>Invite stakeholders to meetings.</li> </ul>	<ul style="list-style-type: none"> <li>Government officials.</li> <li>Affected communities.</li> <li>Vulnerable groups.</li> <li>Employees and managers;</li> <li>NGOs and CBOs.</li> <li>General public / media.</li> <li>Financial institutions.</li> </ul>
Print media, TV and radio announcements	<ul style="list-style-type: none"> <li>Disseminate project information to large audiences, and illiterate stakeholders.</li> <li>Inform stakeholders about consultation meetings</li> </ul>	<ul style="list-style-type: none"> <li>Affected communities.</li> <li>Vulnerable groups.</li> <li>NGOs and CBOs.</li> <li>General public / media.</li> </ul>
One-on-one interviews	<ul style="list-style-type: none"> <li>Solicit views and opinions.</li> <li>Enable stakeholders to speak freely and confidentially about controversial and sensitive issues.</li> <li>Build personal relations with stakeholders.</li> <li>Recording of interviews.</li> </ul>	<ul style="list-style-type: none"> <li>Government officials.</li> <li>NGOs and CBOs.</li> </ul>
Formal meetings	<ul style="list-style-type: none"> <li>Present Project information to a group of stakeholders.</li> <li>Allow the group of stakeholders to provide their views and opinions.</li> <li>Build impersonal relations with high level stakeholders.</li> <li>Distribute technical documents.</li> <li>Facilitate meetings using PowerPoint presentations.</li> <li>Record discussions, comments/questions raised and responses.</li> </ul>	<ul style="list-style-type: none"> <li>Government officials.</li> <li>Financial institutions.</li> </ul>
Public meetings	<ul style="list-style-type: none"> <li>Present Project information to a large audience of stakeholders, and in project affected communities.</li> <li>Allow the group of stakeholders to provide their views and opinions.</li> <li>Build relationships with neighbouring communities.</li> <li>Distribute non-technical Project information.</li> <li>Facilitate meetings using PowerPoint presentations, posters, models, videos and pamphlets or Project information documents.</li> <li>Record discussions, comments/questions raised and responses.</li> </ul>	<ul style="list-style-type: none"> <li>Affected communities.</li> <li>Vulnerable groups.</li> <li>General public / media.</li> </ul>
Workshops	<ul style="list-style-type: none"> <li>Present Project information to a group of stakeholders.</li> <li>Allow the group of stakeholders to provide their views and opinions.</li> <li>Use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies.</li> <li>Recording of responses.</li> </ul>	<ul style="list-style-type: none"> <li>Employees and managers.</li> <li>Contractors</li> <li>Financial institutions.</li> </ul>

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Focus group meetings	<ul style="list-style-type: none"> <li>• Allow a smaller group of between 8 and 15 people to provide their views and opinions of targeted baseline information.</li> <li>• Build relationships with neighbouring communities.</li> <li>• Use a focus group interview guideline to facilitate discussions.</li> <li>• Record responses.</li> </ul>	<ul style="list-style-type: none"> <li>• Affected communities.</li> <li>• Vulnerable groups.</li> <li>• Employees and managers.</li> <li>• NGOs and CBOs.</li> <li>•</li> </ul>
Surveys	<ul style="list-style-type: none"> <li>• Gather opinions and views from individual stakeholders.</li> <li>• Gather baseline data.</li> <li>• Record data.</li> <li>• Develop a baseline database for monitoring impacts.</li> </ul>	<ul style="list-style-type: none"> <li>• Affected communities.</li> <li>• Vulnerable groups.</li> <li>• Employees and managers.</li> </ul>

### 5.3 Stakeholder Engagement History Overview

The Gatsuurt Project has a history of over twenty years' consultation with Government and the communities living and working in the area. Consultation with communities has included that required by the Government of Mongolia during the preparation of DEIA documentation for all components of the Project, as well as additional consultation undertaken by Centerra. The Gatsuurt Project has been managed as an operational mine since 2004, and required statutory consultation for each of the DEIAs developed for the Project.

#### 5.3.1 Previous Public Disclosure of Project Activities

Materials for public disclosure have been developed by Centerra to meet Project commitments to provide meaningful and accessible information for communities potentially affected by the Project. These include:

- Disclosure of DEIAs as required under Mongolian regulations;
- PowerPoint presentations to stakeholders including: Centerra's Joint Working Groups; Government organisations and Parliamentary members; community leaders; Community Development Fund partners and beneficiaries; soum and bagh meetings<sup>4</sup>;
- Centerra Community Handbook, developed in 2011, alongside maps and a poster series for display at the Centerra information centres in Zuunkharaa, Baruunkharaa and Tunkhel.

#### 5.3.2 ESIA Phase Stakeholder Engagement

Stakeholder engagement has been an on-going process throughout the local EIA process, and through the development of the SIA (SIA - conducted during 2015). Four distinct engagement phases are relevant to the Project and this SEP:

- EIA Baseline Engagement Phase<sup>5</sup> (complete);
- SIA Baseline Engagement Phase (complete);

#### EIA Baseline Engagement Phase:

Stakeholder engagement for the Gatsuurt Project Environmental Impact Assessment was completed in 2014 by Nature Friendly LLC and included the following key activities:

- Meetings with local herders and citizens;
- Meetings with local government (CRK and bagh) representatives and leaders;
- Site tours of the Gatsuurt Project for Members of Parliament, Government Ministers, officials, local citizens and local leaders;
- Meetings at Community Information Centres;
- Distribution of print materials, fact sheets and newspaper articles; and
- Presentation to Government Joint Working Group meetings.

#### SIA Baseline Engagement Phase:

<sup>4</sup> Including most recently, Gatsuurt Project Overview (3 March 2015).

<sup>5</sup> The EIA and SIA for the Project were not conducted concurrently. The EIA was conducted in 2014 and the SIA in 2015 and were therefore subject to separate engagement processes.

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During the SIA baseline fieldwork (May-June 2015) the focus of engagement was primarily on gathering information and opinions from stakeholders. The social baseline study was preceded by an initial scoping consultation period with key internal and external stakeholders. Scoping with key internal stakeholders was conducted, both in Ulaanbaatar at the Centerra head office and through consultation with key Company and Lender representatives on site to verify the initial document review, to assess the Project Area, and conduct some initial public consultation. The social baseline study involved extensive engagement with Project stakeholders during May-June 2015, including a household survey, Key Informant Interviews, and Focus Group Discussions. The specific objectives of engagement during this baseline phase were to:

- Identify potential impacts and issues that will be covered in subsequent phases
- Further identify stakeholders related to the Project;
- Identify and gain access to relevant data for the baseline;
- To gather stakeholder opinions on the proposed project and ensure that these opinions are fed into the assessment process;
- To gather stakeholder feedback on the development of management and mitigation measures of potential impacts, particularly where stakeholders have a potential role to play in these measures.

## **5.4 Ongoing and Future Stakeholder Engagement Programme:**

### **5.4.1 ESIA Consultation and Disclosure**

Following the completion of the environmental and social Project related documentation, EBRD requires that the public is provided with adequate information on the environmental and social aspects of the Project to enable stakeholders to provide Centerra with comments on the proposed Project plans, impacts and mitigation measures. The minimum consultation period is 60 days. To facilitate this objective Centerra will make the relevant documentation publicly available via different channels targeted toward the needs of the specific audiences.

The Project ESIA Disclosure Package consists of documents and reports developed for the purposes of local environmental permitting as well as supplementary documents that go beyond national legislation developed to meet the requirements of the EBRD. These supplementary reports together form the ESIA Disclosure Package as follows:

1. Non-Technical Summary;
2. Statutory approved DEIA reports;
3. Social Impact Assessment;
4. EIA from feasibility study;
5. Environmental and Social Management Plans (including this Plan); and
6. Ethnographic Report of the Intangible Cultural Heritage of the Gatsuurt Area.

The ESIA Disclosure Package will be available both in English and in Mongolian via the EBRD website ([www.ebrd.com](http://www.ebrd.com)) and the Centerra / BGC website (<http://www.centerragold.com/> / [www.boroogold.mn](http://www.boroogold.mn)).

Hard copies of these documents will also be available at EBRD offices in Mongolia and London, and at the Centerra offices in Mongolia and Canada. Hard copies will also be shared with the local administrations at the *aimag*, *soum* and *bagh* level. Centerra's head office in Ulaanbaatar and Canada, the Boroog Gold Company Community Information Centres in Zuunkharaa, Baruunkharaa and Tunkhel bagh centre, in addition to the Government offices in Selenge aimag, Mandal soum, Bayangol soum and Tunkhel bagh will also have the package of printed documents available for perusal by interested parties. Hard copies of the NTS and presentation from the disclosure road show (see below for description of road show activities) will be provided to all interested parties to take away at the above-listed locations, and will be made available at the road show locations/events.

A disclosure road show in the Project area will be conducted by Centerra. The road show will comprise key members of Centerra's senior leadership and community relations team and involve the presentation of the information contained within the disclosure package at appropriate community fora in Ulaanbaatar, Mandal soum, Bayangol soum and Tunkhel bagh. The road show is also intended to provide stakeholders with the opportunity to ask questions and provide comments on the environmental and social aspects of the Project.

Table 6 provides a summary of the Ongoing and Future Stakeholder Engagement Action Plan. The detailed version of the Plan is held internally by the Company.



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**Table 6 Ongoing and Future Stakeholder Engagement Action Plan**

Activity	Type of information to be disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups to be Consulted
<b>ESIA Disclosure Phase</b>			
Hard copies of Disclosure Package documents to be made available for perusal	<p>The Project ESIA Disclosure Package consists of:</p> <ul style="list-style-type: none"> <li>• Non-Technical Summary;</li> <li>• Statutory approved DEIA reports;</li> <li>• Social Impact Assessment;</li> <li>• EIA from feasibility study;</li> <li>• Environmental and Social Management Plans (including this Plan); and</li> <li>• Ethnographic Report of the Intangible Cultural Heritage of the Gatsuurt Area.</li> </ul>	<ul style="list-style-type: none"> <li>• Selenge aimag Government Office;</li> <li>• Mandal soum Government office;</li> <li>• Bayangol soum Government office;</li> <li>• Tunkhel Bagh centre Government office;</li> <li>• Zuunkharaa Boroo Gold Company Community Information Centre;</li> <li>• Baruunkharaa Boroo Gold Company Community Information Centre;</li> <li>• Tunkhel bagh Boroo Gold Company Community Information Centre;</li> <li>• Kherkh Bagh Government office;</li> <li>• Centerra Gold offices in UB and Canada.</li> <li>• Company website.</li> </ul> <p>Dates: TBC Hard copies will be made available at key locations specified above. Locations of available documentation will be publicised prior to documents being made available using local media (e.g. community noticeboards, flyers, and local newspapers) and through notification of local administrative authorities and community representatives (e.g. Governors, and CRKs).</p>	<ul style="list-style-type: none"> <li>• All interested stakeholders.</li> </ul>
ESIA Consultation and Disclosure Road Show to discuss the ESIA Disclosure Package documentation.	<p>The Project ESIA Disclosure Package consists of:</p> <ul style="list-style-type: none"> <li>• Non-Technical Summary;</li> <li>• Statutory approved DEIA reports;</li> <li>• Social Impact Assessment;</li> <li>• EIA from feasibility study;</li> <li>• Environmental and Social Management Plans (including this Plan); and</li> <li>• Ethnographic Report of the Intangible Cultural Heritage of the Gatsuurt Area.</li> </ul>	<ul style="list-style-type: none"> <li>• Ulaanbaatar;</li> <li>• Mandal soum (Zuunkharaa);</li> <li>• Bayangol soum (Baruunkharaa);</li> <li>• Tunkhel bagh centre;</li> <li>• Kherkh bagh centre.</li> </ul> <p>Dates: TBC Stakeholders will be informed of disclosure activities in their area at least 2 weeks prior to activities taking place through local media (community noticeboards, flyers, local newspapers and through notification of local administrative authorities and community representatives (e.g. Governors, and CRKs).</p>	<ul style="list-style-type: none"> <li>• Government</li> <li>• NGOs</li> <li>• Local community</li> <li>• Public Groups</li> <li>• Potential Clients</li> <li>• General public</li> </ul>
<b>Pre-Construction Phase</b>			

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General pre-construction planning and site preparation prior to construction.	Overall schedule of site preparation and construction, including sub-activities, key stages and potential stages of stakeholder interest, including road development and construction / operational work camp development	<ul style="list-style-type: none"> <li>• Notices on public notice boards, in shops, local offices etc.</li> <li>• Information delivered to local businesses / Residents through leaflets and open house meetings, as well as public notice boards.</li> <li>• Press announcement, local media television and radio.</li> <li>• Community Liaison Groups, monthly meetings.</li> <li>• A Consultation Committee will be set up prior to construction within Project area communities</li> </ul>	Local community Public Groups General public NGOs
Specific consultation with Herders	Supplementary Information Package	Prior to construction and will be repeated on regular basis	Herders
Specific consultation with formal cooperatives of artisanal miners and / or their representative associations in Mongolia <sup>6</sup>	Consultation on artisanal mining issues / concerns.	prior to construction and will be repeated on regular basis	Artisanal miners and / or their representatives
Specific consultation with vulnerable groups only meetings in Project area communities	Information on project components, in particular the use of a construction workforce, and also potential employment opportunities, including skills required and training Opportunities.	prior to construction and will be repeated on regular basis	Young people / women / disabled people.
<b>CONSTRUCTION PHASE</b>			
Construction Phase general information provision.	<ul style="list-style-type: none"> <li>• Schedule of construction works.</li> <li>• Construction activities.</li> <li>• Progress of construction.</li> <li>• Construction impacts and mitigation measures (with opportunities for feedback).</li> </ul>	<ul style="list-style-type: none"> <li>• Notices on public notice boards, in shops, local offices etc.</li> <li>• Information delivered to local businesses / residents through leaflets and open house meetings, as well as public notice boards and safety signs.</li> <li>• Newspapers;</li> <li>• Broadcasting media: Radio stations</li> <li>• Community Liaison Groups, as part of the monthly meetings.</li> </ul>	<ul style="list-style-type: none"> <li>• NGOs</li> <li>• Local community</li> <li>• Public Groups</li> <li>• General public</li> </ul>
Consultation and communication on employment	<ul style="list-style-type: none"> <li>• Construction phase employment opportunities, application processes.</li> </ul>	<ul style="list-style-type: none"> <li>• Notices on public notice boards, in shops, local offices etc.</li> <li>• Information delivered to local businesses / residents through leaflets and open house meetings, as well as public notice boards and safety signs.</li> <li>• Newspapers;</li> </ul>	<ul style="list-style-type: none"> <li>• Local community</li> <li>• Vulnerable groups</li> <li>• General public</li> </ul>

<sup>6</sup> This does not refer to engagement with Trespass and Illegal Miners, who are subject to separate measures, outlined in the Social Management Plan.

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		<ul style="list-style-type: none"> <li>Broadcasting media: Radio stations</li> <li>Community Liaison Groups, as part of the monthly meetings.</li> </ul>	
Communications on volume and timing of haul truck movements	Traffic information and logistics, key risks to community health, safety and security,	TBC	<ul style="list-style-type: none"> <li>Local community</li> <li>General Public</li> <li>Relevant state authorities</li> </ul>
Engagement with local authorities, communities and NGOs on community investment projects	Community development and investment plans and processes	Focus Group Meetings Public meetings Surveys	<ul style="list-style-type: none"> <li>Local community</li> <li>NGOs and CBOs</li> <li>Vulnerable groups.</li> <li>Local Government.</li> </ul>
Regular engagement to notify of key safety and security issues on, around and offsite.	Notification of safety issues on and around site and offsite (where applicable)	TBC	<ul style="list-style-type: none"> <li>Local community</li> <li>General public</li> <li>State security department / organisations</li> </ul>
Continue stakeholder engagement efforts to ensure that all potentially affected stakeholders know how to contact the company and to file grievances (in accordance with the Grievance Procedure).	Grievance mechanism awareness	TBC	<ul style="list-style-type: none"> <li>All stakeholders</li> </ul>
<b>OPERATIONAL PHASE</b>			
Employment Opportunities	Information on employment opportunities, skills required, training and support provided and access to information.	Job descriptions; brochures / information on skills required, etc.	<ul style="list-style-type: none"> <li>Local and regional community.</li> <li>Local and regional businesses.</li> </ul>
Company Performance in Operational Phase	Annual update and reporting on the ESAP.	<ul style="list-style-type: none"> <li>Company Reports.</li> <li>Summary under 'Social Responsibility'</li> <li>Section of company website.</li> <li>Bi-annual meetings (one every 6 months) with appointed personnel to review performance and consider issues raised by local stakeholders.</li> <li>Community Liaison Groups, ongoing monthly meetings.</li> </ul>	<ul style="list-style-type: none"> <li>Internal Stakeholders</li> <li>Local community</li> <li>Suppliers</li> <li>Customers</li> </ul>
Centerra's existing security force will regularly police the Gatsuurt area as per existing operations and evict any illegal loggers / Trespass and Illegal Miners that are encountered.	Consultation to create awareness on planned Company actions in the event of illegal logging.	<ul style="list-style-type: none"> <li>TBC</li> </ul>	<ul style="list-style-type: none"> <li>Illegal loggers;</li> <li>Trespass and Illegal Miners;</li> <li>General Public;</li> <li>Local community.</li> </ul>
Establish a Social Closure Working Group and work with the group to develop social closure actions which will be updated from a conceptual to a detailed plan through the Operations phase of	Social closure actions and priorities. Mine Closure Plan	<ul style="list-style-type: none"> <li>TBC</li> </ul>	<ul style="list-style-type: none"> <li>Local Community;</li> <li>Soum / aimag Government;</li> <li>NGOs;</li> <li>Vulnerable groups;</li> <li>Local businesses and associations.</li> </ul>

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the Project prior to detailed implementation at Closure.			
Engage with schools, TVET providers and universities to support industry learning through the operations phase.	Training / skills requirements and needs Partnership opportunities Candidates	• TBC	• TVET providers; • Universities.
Engage with the Government and Municipality in monitoring and improving the medical infrastructure and services.	Medical infrastructure needs and issues.	• Monthly/quarterly basis during operations	• Soum / bagh Government; • CRKs.
Outreach program to periodically bring visitors for site visits in a controlled and safe manner.	Mining awareness and education.	• TBC	• Interested stakeholders from the local communities.
<b>CLOSURE PHASE</b>			
The SEP will be revised during the closure phase and key stakeholders (communities, authorities, artisanal miners, herders, etc., will be identified and consulted prior to and during the closure of the mine.			

## 6 GRIEVANCE MANAGEMENT

Centerra understands that it is a guest in Mongolia. Centerra aims to develop mineral resources in a manner that generates value for Mongolia and its people and for the Company. The Company recognises that in addition to mining and operational licenses, it must earn 'social acceptance to operate' from the communities in the impacted area. Centerra works to international best practice and standards set out by the global institutions that provide funds for mining projects.<sup>7</sup>

Centerra respects the values and lifestyle of the people who are affected by the Company's exploration, construction, operations and closure activities. The Company strives for regular, sincere and positive engagement with impacted communities, and seeks continuous improvement in cooperating and communicating with communities.

Centerra recognises that communities need an agreed process to raise, discuss and process grievances on relevant Company activities that affect their lives. The Grievance Mechanism outlined below is the result of consultations with a wide range of community members in the areas where we work.

Centerra recognises the primacy of the Mongolian government and the full set of laws, regulations and by-laws that form the legal framework for Mongolia. This Grievance Mechanism is not intended to replace or supersede Mongolian law. It is a process offered by the Company to facilitate solutions to concerns, whenever possible, in a civil manner, through dialogue and written confirmation. This Grievance Mechanism is established and tested, having been used by the Company at the Boroo Gold Mine. It will continue to be in place during the construction, operations, and decommissioning phases. It may also be in place for a designated period post-closure.

Centerra has a separate internal grievance mechanism in place for employees and contractors (and their organisations, where they exist) to raise reasonable workplace concerns. Centerra will inform the workers

<sup>7</sup> International Finance Corporation Performance Standard (PS) 1 presents the most significant reference to grievance mechanisms. The section on Social and Environmental Assessment and Management Systems (pp. 5–6) states: "*The client will respond to communities' concerns related to the project. If the client anticipates ongoing risks to or adverse impacts on affected communities, the client will establish a grievance mechanism to receive and facilitate resolution of the affected communities' concerns and grievances about the client's environmental and social performance.*" Further references to grievances mechanisms are associated with the Performance Standards on Labor and Working Conditions (PS2); Community Health, Safety and Security (PS4); Land Acquisition and Involuntary Resettlement (PS5); and Indigenous Peoples (PS7).

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of the grievance mechanism at the time of hiring and make it easily accessible to them. The mechanism will 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 will 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.

## 6.1 Purpose

The Grievance Mechanism describes the way the Company and community can work together to find solutions to grievances. The Mechanism provides for a fair hearing and procedural justice, access to information and access to a fair remedy – without fear of retaliation.

## 6.2 Goals

- To be respectful of complainant culture, values, traditions and views;
- To resolve grievances at the local level and in a timely manner;
- To identify the root causes of grievances and address systemic issues;
- To provide a process that is dialogue based, with the complainant and the Company cooperating in the investigation, discussion, resolution and announcement of the grievance and result;
- To ensure fair, equitable and consistent outcomes to resolve grievances;
- To enhance and continuously improve the ability of the Company to fairly address community concerns.

## 6.3 Scope

The Grievance Mechanism is primarily for the community to raise relevant concerns about the Company's activities. The concerns raised should be a direct result of the Company's activities in and around the mine site. The concerns must be raised by the person / people who are directly affected by the particular complaint with the Company's activities. The mechanism respects Mongolian laws and regulations. The Company prefers to handle grievances at a local level, before they escalate, if applicable, to a judicial or other national process.

## 6.4 Procedure of Grievance Mechanism

### 1 Register a grievance:

- A grievance can be submitted in a written letter, e-mail or fax or on the Company grievance form (see Appendix 1) to:
  - Attention: Community Relations Department, Centerra Gold Mongolia,
  - Postal Address: Bodi Tower, 11th floor, Chinggis Square, P.O.223, Ulaanbaatar-15160, Mongolia
  - Telephone: +976-11-317798
  - Fax: +976-11-316100
  - Email address: [Enkhtuul.j@centerragold.mn](mailto:Enkhtuul.j@centerragold.mn)
  - Company Website: [www.centerragold.com](http://www.centerragold.com); [www.boroogold.mn](http://www.boroogold.mn)
- Complaints may also be raised verbally, and documented by the Community Relations Officer (or other relevant Company representative). In the event that a complaint is raised verbally the Community Relations Officer must obtain the approval of the complainant as to the documented complaint (by way of signature of the Receipt of Grievance Form). Should the complainant have literacy issues, the Community Relations Officer may request that a third party (friend / relative of complainant) is available to verify / approve the contents of the documented complaint to the satisfaction of the complainant.
- The submission should include the nature of the grievance, the date when it occurred and the name and contact details of the complainant.
- If there is a Company Community Relations Officer in your area, a grievance can be discussed with them prior to being officially submitted.
- Grievances will be accepted anonymously or through a third party (e.g. unions, NGOs, local authorities, elders' committees, etc.).
- Individuals have the right to request that their name be kept confidential throughout the grievance process.

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- As men and women may communicate their grievances differently, and also have different types of grievances, the complainant may request that their grievance is processed by a female / male representative of the Company. In the event that such a request is made, Centerra will, as far as reasonably practicable, accommodate this request.

## **2 Within a Week (7 days) of Receiving the Grievance the Company will:**

- Enter the grievance into the Company records that track grievances;
- Assess the grievance according to specific criteria and if necessary, develop an appropriate approach for the particular grievance;
- Provide a written acknowledgement of the grievance including the name of the Company person to contact about progress, an explanation of the steps that will be taken to investigate, discuss and resolve the grievance, and an anticipated timetable for processing the grievance.

## **3 Processing the Grievance:**

The Company Grievance Coordinator will:

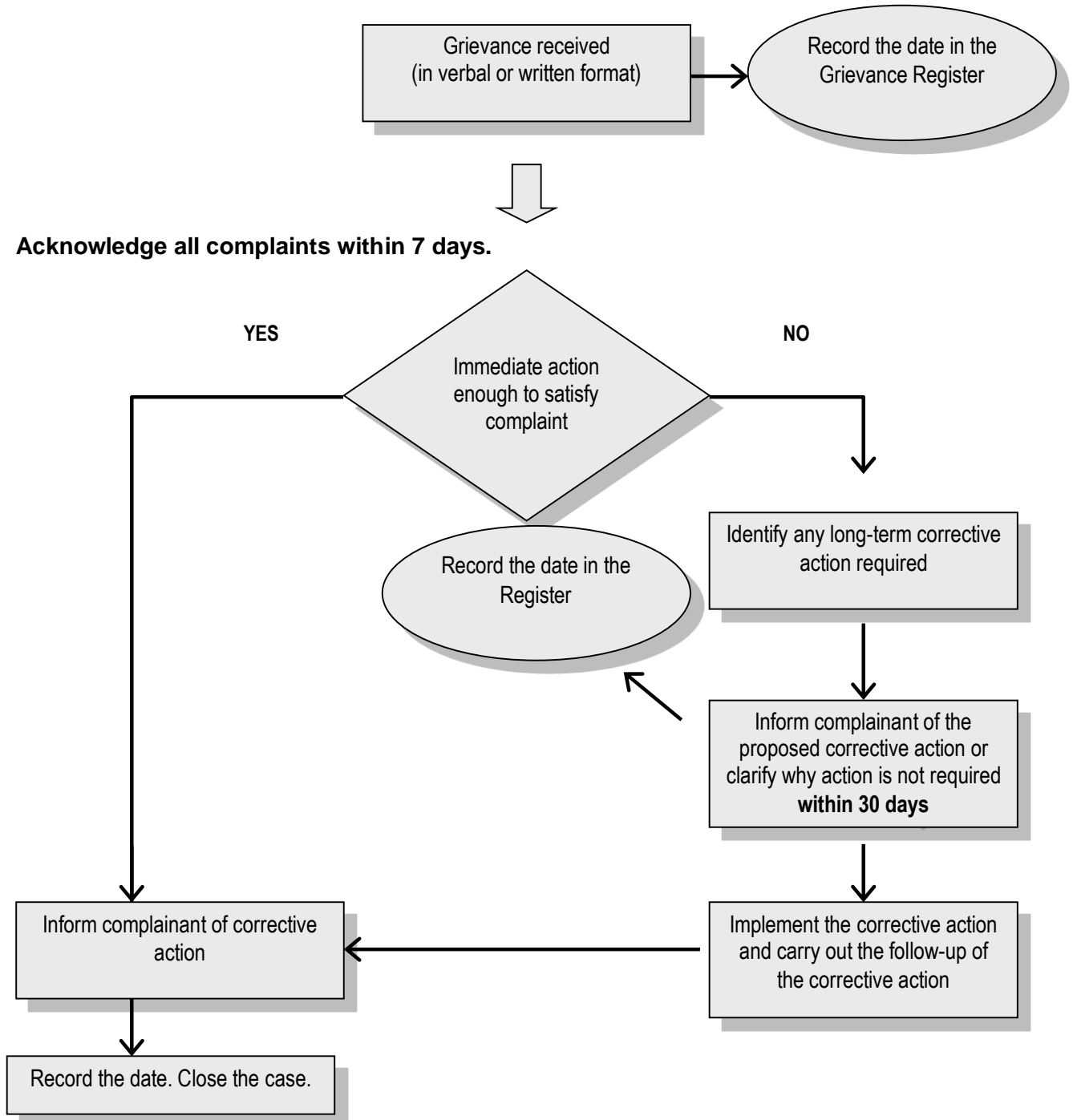
- Identify the parties involved;
- Clarify issues and concerns raised by the grievance through direct dialogue;
- Classify the grievance in terms of seriousness according to the gravity of the allegation, the potential impact on an individual's or a group's welfare and safety, or the public profile of the issue;
- Convene a staff group with expertise relative to the grievance;
- Determine the method for resolving the grievance – the most common approaches, not excluding others, will be:
  - The Company proposes a solution;
  - The Company and community decide together the solution;
  - The Company and community defer to a third party to decide;
  - The Company and community utilise traditional or customary practices that are in place locally.
- Gather views of other stakeholders, including those of the Company and if necessary, an agreed neutral technical opinion;
- Determine initial options that parties have considered and explore various approaches for settlement;
- Conduct the process as agreed;
- Close the grievances by signing the Complaint Close-Out Form (i.e. that the grievance has been resolved satisfactory to both parties).
- The Company may "close" the grievance even if the complainant is not satisfied with the outcome. This option can be pursued by the Company in the case that the complainant is unable to substantiate a grievance, or if there is an obvious speculative or fraudulent attempt. In such situations, the Company's efforts to investigate the grievance and to arrive at a conclusion will be well documented and the complainant advised of the situation. Centerra (or contractors working for the Company) will not dismiss grievances based on a cursory review and close them in their grievance record unless the complainant has been notified and had the opportunity to provide supplementary information / evidence;
- Keep a record that tracks the progress and communications for each grievance.

## **6.5 Processing Timeline**

The Company will aim to bring the grievance to a resolution within 30 days of receiving the grievance. The grievance shall be acknowledged within 7 days by Centerra, and responded to within 30 days. If the matter takes longer than 30 days to resolve, the complainant will be informed through dialogue and in writing, of the reason for the delay, any advances or difficulties encountered and the anticipated new resolution date.

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**Figure 2: Flowchart for Processing Grievances**



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## 6.6 Disclosure of the Grievance Mechanism

The grievance mechanism will be made public through:

- This SEP;
- Local newsletters;
- Local bulletin board;
- Through community meetings;
- By informing the local CRK and Governors; and
- Regular reporting to the Community/Company Joint Working Group.

## 6.7 Acknowledgement of Satisfactory Process

At the resolution stage of a grievance negotiation, the Company will ask the complainant to complete a form where the complainant assesses the way the grievance was handled, even if the complainant is not happy with the result (see Appendix 2). This form will refer to the goals of the Grievance Mechanism and ask the complainant if their experience of the grievance process is aligned with the goals the Company has set for itself. For example, the following questions will be asked:

- Did the Company and its representatives act in a respectful manner?
- Did the Company do all it could to resolve the grievance locally?
- Did the Company look for the underlying cause of the issue you have raised?
- Did you feel an equal partner in the process of resolving your grievance?
- Is the resolution of your grievance fair and consistent with similar resolutions in the same area?

This feedback will help the Company to adjust and improve the Grievance Mechanism.

## 6.8 Recourse

If the complainant is not satisfied with the outcome of the grievance process the Company will cooperate in forwarding the grievance to another mechanism. The recourse mechanism will vary depending on the nature of the grievance. For example, if it is a legal matter it could be moved into the judicial system. If appropriate the matter could be referred to the Tripartite Council of Mongolia for Mining and Natural Resource Conflict Resolution.

Independent external parties may be invited / needed to be involved in the processing of grievances. These could include, for example, a local legal practice, a well-regarded NGO or well-respected individuals from the community. External parties' involvement and remit would only be those grievances which have been addressed through the grievance mechanism and have been declared resolved but the complainant is dissatisfied with the proposed resolution. External parties may be involved with one or both of the following objectives/functions:

- Mediation, which is the facilitation of both parties' efforts to reach an acceptable solution; and / or
- Binding arbitration, whereby both parties agree to be bound by the decision of an independent arbiter

## 6.9 Managing, Tracking, Analysing and Predicting Grievances – Inside the Company

The Company will appoint a senior manager to oversee the Grievance Mechanism. Another member of staff will be appointed to carry out the day to day work in this area and involve specialist staff and external parties (see Section 6.8) who may need to be consulted to resolve a grievance. Centerra Community Liaison Officers will work with relevant departments within Centerra depending on the nature of the grievance. For example, should the grievance involve a security issue, then the Community Liaison Officer will work in close cooperation with the OHS department to resolve the grievance.

The Company will maintain a register of grievances. All transactions including registration of the grievance and the progress to outcome will be recorded.

The Company will ensure that grievances and resolutions are communicated internally to all staff through monthly reports.

Every quarter, the register will be analysed for trends, systemic issues, and reoccurrences of similar grievances. If there is a root cause behind a series of similar grievances, the Company will consider taking



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action to resolve the overall or underlying issue. Feedback from citizens who have used the Grievance Mechanism will be used to make improvements.

The Company will launch the Grievance Mechanism and regularly remind communities that it is available to use.

Contractors are expected to follow this Grievance Procedure. Contractor shall be proactive and available to participate in Centerra's grievance resolution processes. Contractor participation is intended to allow for specific contractor grievances to be addressed efficiently.

Contractors shall ensure that all individual contractor employees are aware of Centerra's Grievance Procedure. Contractors will receive any grievance from an individual or community and notify Centerra thereof immediately.

Contractors shall not make any direct agreements or resolution with local communities without prior coordination of such actions with Centerra.

The contractor's community relations team (or equivalent) will attend all coordination meetings requested by Centerra on a daily, weekly and extraordinary basis, as required. The contractor community relations management (or equivalent) will report to the Centerra Community Relations team on a weekly and extraordinary basis – in regards to social incidents and community relations issues. Centerra will conduct regular audits on contractors to ascertain compliance with this Grievance Procedure.

## 7 COMPANY CONTACT INFORMATION

Company contact information is provided in Table 7 below.

	<b>Details</b>
<b>Company Name</b>	Centerra Gold Mongolia
<b>Company Contact</b>	Community Relations Department
<b>Postal Address</b>	Postal Address: Bodi Tower, 11th floor, Chinggis Square, P.O.223, Ulaanbaatar-15160, Mongolia
<b>Telephone Number</b>	+976-11-317798
<b>Fax Number</b>	+976-11-316100
<b>Email Contact</b>	<a href="mailto:Enkhtuul.j@centerragold.mn">Enkhtuul.j@centerragold.mn</a>
<b>Company site</b>	<a href="http://www.centerragold.com">www.centerragold.com</a> ; <a href="http://www.boroogold.mn">www.boroogold.mn</a>

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## Appendix 1: Form 1 “Receipt of Grievance”

<b>No.</b>	
<b>Date:</b>	<i>dd/mm/yy</i>
<b>Name of Aggrieved:</b>	
<b>Contact Address of Aggrieved:</b>	<i>incl. aimag, soum, bagh, street, building / apartment</i>
<b>Tel (mobile):</b>	
<b>Tel (home):</b>	
<b>Email:</b>	
<b>Nature of grievance (what happened):</b>	
<b>When occurred:</b>	<i>dd/mm/yy</i>
<b>Frequency:</b>	<i>daily / weekly / monthly</i>
<b>Place (where grievance occurred):</b>	<i>incl. aimag / soum / bagh / area</i>
<b>Who was involved:</b>	<i>incl. name / job title / description (if known)</i>
<b>Why it is relevant to BGC:</b>	
<b>Your proposed/desired solution:</b>	
<b>Office Use Only:</b>	
<b>Company officer who received grievance:</b>	<i>Name / job title</i>
<b>Decided to – ACCEPT:</b>	<b>Category:</b>
	<b>Next steps:</b>
<b>Decided to – REJECT:</b>	<b>Reasons:</b>
<b>Signature of Aggrieved:</b>	
<b>Signature of Staff:</b>	

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## Appendix 2: Form 2 “Acknowledgement of Solution”

<b>No.</b>	
<b>Name of Aggrieved:</b>	
<b>Contact Address of Aggrieved:</b>	<i>incl. aimag, soum, bagh, street, building / apartment</i>
<i>Please tick your answer to each of the questions below:</i>	
1. Did the Company and/or its representative act in a respectful manner to You?	YES <input type="checkbox"/> NO <input type="checkbox"/>
2. Did the Company do all it could to resolve the grievance locally?	YES <input type="checkbox"/> NO <input type="checkbox"/>
3. Did the Company look for the underlying cause of the issue you have raised?	YES <input type="checkbox"/> NO <input type="checkbox"/>
4. Did you feel an equal partner in the process of resolving your grievance?	YES <input type="checkbox"/> NO <input type="checkbox"/>
5. Is the resolution of your grievance fair and consistent with similar resolutions in the same area?	YES <input type="checkbox"/> NO <input type="checkbox"/>
Signature	
Date:	