



# **ACACIA MINE OPERATION GOKIRMAK COPPER MINE**

## **Community Development Framework 2017**

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## 1 INTRODUCTION

### 1.1 Brief Summary

This document presents the community development approach of Acacia Mine Operations (AMI) for the Gökırmak Cooper Project (GCP). It briefly presents how the Company intends to maximize positive benefits of the project for the project affected communities in addition to social impact management measures as well as contributing to sustainable development of the local communities. The details and specific content will be developed in the Community Development Plan. This framework presents the scope and principles in general. It clarifies the goal and approach of the AMI in regards to design and implementation of community development projects. It provides road map and a clear direction for the AMI's Public Relations Unit, be derived from consultation with the community and other stakeholders, inform decision making about priorities and resourcing for community development initiatives, help to consolidate existing plans and documents.

### 1.2 Purpose

The purpose of this Framework is to:

- define the scope of the Framework and set out applicable management interfaces;
- define roles and responsibilities;
- outline the applicable Project Standards relevant to this Framework;
- define Project commitments, operational procedures and guidance relevant to this Framework;
- identify potential areas of development and draft scope of project/initiative areas;
- define monitoring and reporting procedures,
- define training requirements;
- set out references for supporting materials and information.

The Framework has been prepared to set out the key objectives, requirements and commitments which will be developed further in a more detailed Community Development Plan and applicable Procedures once additional information has been collected and detailed management actions have been defined. The Plan will supersede and replace this Framework.

#### 1.2.1 Objectives of AMI Community Development Activities

The overall purpose of this Community Development Framework is to maximise the positive short-term impacts on local communities around the AMI Mine. The Community Development Framework goes beyond the specific impact mitigation measures that the Project will employ and the compensation of affected people for adverse impacts to initiate support for development of communities.

Goal	Objectives
Maximize overall positive impacts of the mine for project affected settlements	<ul style="list-style-type: none"><li>• Through community development projects and initiatives increase the access and capacity of the communities to benefit from development impacts of</li></ul>

	the mine (employment, service provision, procurement, economic development etc.) through supportive measures, expand the development impacts of the mine in the project area.
Contribute to the sustainable development of the communities	<ul style="list-style-type: none"> <li>• Through a range of projects and initiatives contribute in               <ul style="list-style-type: none"> <li>○ Improvement of the well-being of communities,</li> <li>○ Development of infrastructures and utilities,</li> <li>○ Physical and capacity development of communal and social services,</li> <li>○ Improve livelihood resources and local economy,</li> <li>○ Enable vulnerable groups to access to the benefits of development,</li> <li>○ Further promote sustainable development of the region.</li> </ul> </li> </ul>

#### Our Corporate Objectives:

Caring for the Social Environment: The term “social environment” refers to living and working conditions and the communities in which we live. The Community Relations Unit commit to managing and protecting the social environment in a sustainable manner for the benefit of the entire community.

The Community Relations Unit will

- improve the quality of community facilities and public spaces in regard to disability access.
- Improve the opportunities for people to access all types of community spaces, including parks and the fore shores.
- Promote the development of community based edible projects.
- Work with others to improve community safety
- Work with others to increase opportunities for people to become involved in their communities

Building Vibrant Communities: We commit ourselves to working with members of the community to build creative, innovative and resilient communities where people feel able and encouraged to participate in the life of that community. In realizing our community development plan we will be working with the communities in a participatory way to enable communities for development.

#### Creating a Socially Prosperous and Socially Sustainable Region:

Project commits complying with IFIs E&S requirements as well as national standards and in the short term will deliver commitments towards managing social impacts and contributing in development of communities in the project affected area. However, we believe that good corporate social citizenship, especially good neighbor relations require having a sustainable and integrated development approach with short term and regional perspectives. Thus we will also look into short term development initiatives in addition to quick impact projects. The content of it will be developed in the community development plan.

Striving for Organisational Excellence: The Public Relations Unit will ensure that we have regular appraisals of our performance to improve accountability and effectiveness, improve our level of knowledge of new developments and best practice in all the fields that we operate in, improve our knowledge of the community, collaboratively across the community development work teams to promote the sharing of knowledge, work across the community development branch to ensure continuous improvement and a better delivery of community development outcomes.

The Community Development Framework is at the core of AMI's commitment to "sustainable development":

- It is focused on the key project-affected neighbourhoods as defined in the ESIA, namely: Hanönü Central and Vakıfgeymene neighbourhoods, Bağdere, Gökçeagaç, Küreçayı villages.
- Community development plan will also analyze in detail various aspects of sustainability i.e. organizational/human capacity (ability of the communities and other partners to sustain initiatives), financial sustainability (economic viability of initiatives), environmental sustainability (not harming environment especially for livelihood enhancement initiatives), proper exit strategies.

#### **Community Development Program Outcomes:**

Some early initiatives for community development support, especially initiatives with quick impact on infrastructure improvement, welfare, services, education and health as well as small scaled donations were already delivered during 2015- 2016-2017.

These include:

- Infrastructure upgrade in the project area by providing machinery and equipment, material provision for construction. These investments were delivered through local authorities and mukhtarships at the village level.
- Upgrade and renovation of public offices and public service facilities such as governorship and directorates, municipality, security force offices, schools, health clinic. Equipment and supplies donations were also delivered to these offices and facilities
- Support for local NGOs including women entrepreneurship association, irrigation union, chamber of merchants and craftsmen in Hanönü. The support included both donations of equipment, supplies and physical capacity development support but also support for delivery of activities and their projects.
- Various support for cultural and recreational activities in villages.

However, these have been managed on request basis so far. Community Development Framework and the subsequent detailed plan will bring a better structured program tool to these activities and plan will detail

implementation of it. The detailed outcomes will be identified within the Community Development Plan; however, key expected outcomes of community development are as below:

- Needs of the communities analyzed,
- Needs are prioritized in a participatory approach
- A program with short and mid-term projects/initiatives are designed and delivered
- Infrastructure, services and social facilities in the project area improved
- Well-being of communities increased
- Livelihoods are enhanced
- Vulnerable groups accessed and benefited from activities
- Local economy benefited positively
- Local capacity to sustain outcomes developed

### **1.3 Commencement**

This Framework applies from 15.09.2017.

### **1.4 Authority and Management**

The AMI General Manager approved this Framework on 15.09.2017.

This Framework is owned by the AMI Environmental and Community Relations Coordinator. This Framework and the subsequent Management Plan will be reviewed on a minimum of a six monthly basis during construction and commissioning. During steady state operations, this Management Plan will be reviewed on an annual basis to determine whether any changes or updates are required to the Management Plan unless a more frequent update is required to reflect changing project design or procedures.

## **2 SCOPE**

### **2.1 Scope of this Framework**

This Framework covers all AMI activities, including contractor activities. Implementation by contractors is addressed in the Contractor Control Management Plan.

### **2.2 Overlaps with other Management Plans**

This Framework is part of the overall suite of Management Plans developed for the AMI Project and as described in the ESMS Framework.

This Framework has overlaps and cross-linkages to a number of other Management Plans and Frameworks which have community development implications, including:

- the Emergency Response Plan, particularly in relation to the protection of local communities from the effects of accidents and incidents;

- the Labour Management Plan particularly in relation to increasing local employment;
- the Contractor Control Management Plan particularly in relation to promoting local employment and local procurement;
- Grievance Mechanism for Stakeholders in relation to managing the delivery of the projects in a smooth way;
- the Mine Closure Framework particularly in relation to protection of local communities from physical hazards remaining once the mine has stopped operating and ensuring enduring positive benefits from the Project after closure;
- the Livelihoods Restoration Plan particularly in relation to ensuring livelihoods of those directly affected by the Project are protected;
- the Stakeholder Engagement Plan particularly in relation to ensuring that local stakeholders are appropriately informed and engaged concerning community development activities;

### 3 ROLES AND RESPONSIBILITIES

#### 3.1 Key Roles and Responsibilities for Framework Implementation

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

**Table 1: Key Roles and Responsibilities**

Role	Responsibilities
AMI General Manager	<ul style="list-style-type: none"> <li>• Ensure Project compliance with the Project Standards and other requirements set out in this Framework.</li> <li>• Approval of this Framework and resources required for implementation.</li> </ul>
AMI Environmental and Community Relations Coordinator	<ul style="list-style-type: none"> <li>• Overall responsibility for Framework scope and implementation.</li> <li>• Development, monitoring and revision of this Framework.</li> </ul>
AMI Community Relations Superintendent	<ul style="list-style-type: none"> <li>• Timely implementation of this Framework, including coordination with implementing organizations and other stakeholders.</li> </ul>

A number of organizations exist that work to improve the livelihoods, opportunities and facilities of local communities surrounding the Project. As set out in this Framework, AMI will collaborate with these partners. Following are some of these organizations as an example list but not limited to those. Community Development Plan will identify the key partners of collaboration for development:



- Municipality and governorships (including local directorates of ministries, education, health, social services and social solidarity foundation etc.) and other related public institutions
- Forestry directorate and local directorate of agriculture and animal husbandry are among key institutions with regards to livelihood pattern of the project affected area.
- Local businesses and business organizations

### 3.2 Key Interfaces

Key interfaces in the implementation of this Framework (i.e. roles with responsibility for delivering elements of this Framework) include:

- AMI Operation Manager, particularly in relation to the safe implementation of off-site activities during operation;
- AMI H&S Manager, particularly in relation to community safety and security management;
- AMI HR Manager, particularly in relation to labour management.

### 3.3 KEY PRINCIPLES FOR COMMUNITY DEVELOPMENT PROGRAMME

#### 1. Focusing on communities with higher impact

Community development will approach communities through a gradual focus in line with the socio-economic area of influence identified in the social impact assessment study. **Central focus with direct activities will be for directly affected settlements which are identified as Central and Vakıfgeyme neighbourhoods, Bağdere, Gökçeagaç and Küreçayı villages.** Hanönü district and district wide 5 neighbouring areas will be in the second tier of limited development initiatives. Details and interaction level will be identified in the Community Development Plan.

#### 2. Building trust

Building trust between AMI, community members and other stakeholders is essential to a successful program. Trust may be difficult to establish and hard to maintain. Thus AMI commits to culturally appropriate consultation and participation, along with good faith and transparency, for building and maintaining trust between all stakeholders.

#### 3. Managing expectations by clearly defining roles and responsibilities

New private sector development tends to raise stakeholder expectations for community development. AMI defined its commitments to community development to prevent the risk of failing to meet these heightened expectations. Framework and a clear plan for community development will prevent the risk from the beginning. AMI will employ a plan to approach development needs on a systematic and program basis to manage expectations properly.

#### 4. Developing Appropriate Capacity

AMI developed appropriate capacity with hiring employees with community development experience and knowledge of local customs and needs. When needed procurement of additional consultancy services will also be undertaken for the development of Plan. For implementation, in addition to in-house resources, external

resources will also be employed; partnerships with external organizations appropriate to the needs of the projects/initiatives will be considered. Priority will be given to encourage local NGOs, cooperatives and other community based organizations for implementation. AMI will also make use of its corporate assets (various resources, contacts, existing business partnerships, know-how, financial and human resources and employee skills etc.) to increase leverage of projects supported by the community development program.

## **5. Setting measurable goals and report on progress**

Setting smart goals and objectives and measuring progress will allow AMI and stakeholders to monitor the program's successes and shortcomings.

## **6. Strategic partnerships**

AMI will form strong, strategic partnerships, when possible, with local or national governments, local NGOs, other local businesses, universities, research institutes, multilateral organizations, unions or other stakeholders with similar objectives.

## **7. Preventing duplications and ensuring cost-effectiveness**

When identifying and selecting projects and initiatives, repetition or duplication will be avoided. This will be ensured through needs assessments, consultation and collaboration with development partners and other relevant stakeholders. It will also avoid ineffective use of resources. Effective use will also be ensured through comprehensive, well thought-out budgets offering value for money.

## **8. Plan for sustainability**

Community Development projects will focus on developing community skills and capacity or improving community incomes yield for sustainable benefits. AMI will ensure sustainability through clearly planning of organizational, technical and human resource requirements/capacity, support with technical assistance if needed, financial sustainability through clear feasibility and capacity assessments. It will also consider environmental sustainability to ensure preservation and development of resources. **AMI will also have a clear exit strategy whereby projects and initiatives will be smoothly handed over communities, governments or other organizations once the program has become sustainable and self-sufficient.** Setting a timetable to handover responsibility with measurable goals and benchmarks is essential to avoiding dependency.

# **4 PROJECT STANDARDS**

Applicable Standards must be complied with for all Project activities (the "Project Standards"). Project Standards comprise:

- Applicable Turkish Standards;
- Turkish EIA requirements;
- other commitments to and requirements of Turkish Government authorities;
- applicable international standards and guidelines;
- applicable AMI standards, policies and procedures;

- other industry guidelines with which AMI has committed to comply.

#### **4.1 Applicable Turkish National Standards**

None applicable.

#### **4.2 Turkish EIA requirements**

There are no specific requirements directly related to community development in the EIA and associated Permits submitted for the AMI project.

#### **4.3 Other Commitments to and Requirements of Turkish Government Authorities**

None applicable.

#### **4.4 Applicable International Standards and Guidelines**

There are no specific requirements directly related to community development. This Framework seeks to support the broad community relations objectives of AMI – in line with the broad requirements of the European Bank for Reconstruction and Development (EBRD) to avoid, minimize and mitigate Project-related impacts.

#### **4.5 Applicable AMI Standards, Policies and Procedures**

The AMI Project has also developed a range of Policies and Procedures that define and support AMI community development objectives. These include;

- AMI Labour Management Plan
- AMI Local Employment and Training Procedure
- AMI Stakeholder Engagement Plan

Key elements of each document are summarized below.

##### **4.5.1 AMI Public Relations Policy**

The AMI Public Relations Policy commits AMI to undertake the following:

- To listen to and engage with host communities in a collaborative, transparent manner to build mutual trust and understanding.
- To work proactively with communities to identify and manage social risks, impacts and obligations.
- To help foster a stable, healthy and safe environment in which to live and work.
- To develop partnerships with host communities, governments, employees, contractors and others to promote sustainable social and economic development.
- To respect the fundamental human rights of all stakeholders with whom we interact.
- To manage grievances in a fair, timely and consistent manner.
- To leave a lasting positive legacy by working with local stakeholders to prepare for our eventual

departure and the closure of our operations.

- To monitor and continually seek to improve our community relations performance in order to create value for our stakeholders and shareholders alike.

#### **4.5.2 AMI Labour Management Plan**

The AMI Labour Management Plan

- defines primarily evaluation for PAPs,
- serves community development goals (local employment, training) as an umbrella document.

It also sets out the key objectives for developing the necessary tools in order to inform the local people of all employment opportunities, the local people in selection of the employees, carrying out the employment processes in line with the human rights, Human Rights Policy, Human Resources Policy, Public Relations Policy.

Labour Management Plan supports community development and it helps to maximize the positive impact and increase the capacity for local communities access.

#### **4.5.3 AMI Local Employment and Training Procedure**

The AMI Local Employment and Training Procedure sets out the key objectives and processes with local employment targets by which AMI will preferentially recruit workers from local communities.

##### **Applicability**

Settlements directly affected by the current activities of the company will have priority, followed by workers in the District (Hanönü) and then the Province (Kastamonu) which is nearby to the project site. Turkish nationals will always be given priority over expatriates, who will only be used where their particular skills and experience cannot be supplied by Turkish nationals.

Opportunities for direct employment will be constrained by the availability of appropriate skills. Taking into consideration the skills limitation within the affected area, the focus of the employment strategy will be employment of the unskilled and semi-skilled workforce if necessary. The Project expects that:

- The vast majority (target of 100%) of the unskilled workforce will come directly from the affected settlements;
- A high proportion of the semi-skilled workers (target of 50%) will come directly from the affected settlements, the districts and the provinces.

**AMI will adopt a “tiered” approach to recruitment. Priority will be given to project affected settlements including Hanönü.** If the required skill is not found here then workers in other adjacent districts and then within Kastamonu Province will be targeted. If the required skills are not found in any of these then AMI will search nationally and then internationally for suitably qualified and experienced staff.

##### **Training Targets**

In addition to levels of hiring, the company will support training for residents so they are better prepared for working at the project site. Below are the objectives and targets for the training programs.

**Table 2: Preliminary Training Targets**

<b>Objective</b>	<b>Indicator</b>	<b>Target</b>
To remove training barriers that may exist for local residents who want to work for the project	# training programs provided to impacted community residents	1 per year
	training completed vs. training planned	100%
To raise the skill level of local residents	# impact community residents trained for skilled positions	1 per year

Contractors will be in compliance with all management plans and procedures submitted by AMI. They will apply same hiring procedures and operate in accordance with AMI's policies and follow all Turkish Labour Laws

AMI will adopt a short-term approach to the training and capacity-development of its workforce. AMI will work with employees to ensure that individuals are prepared for mine-closure and that skills are transferable to other mining projects, or to other industries.

## **5 MANAGEMENT APPROACHES**

### **5.1 Summary**

Community development for AMIAMI comprises the development and implementation of a range of activities to ensure that local communities are provided with opportunities to benefit from the presence of the Project.

## 5.2 Approach

AMI will develop a short –term to medium term community development plan focused on closure from the outset. The objective will be to ensure that investment and support by AMI is focused on building the economic resilience and diversity of local communities so that at mine closure there are not the significant dislocations in local economies that often accompany mine closure.

Given the small size and short duration of the AMI project, AMI will seek to coordinate the implementation of the community development plan using its internal resources. Third parties will be used as advisors/technical assistance providers, implementing partners for the specific investment projects. Third parties may also be engaged to undertake monitoring and evaluation of the effectiveness of individual projects and of the overall community development plan.

### 5.2.1 Key Actions

To do this, AMI will undertake the following actions:

- Work with local *communities* and Government representatives to identify local community development needs and priorities; Already 2 development workshops on discussing ideas for local development were conducted with support from AMI between 2015-2017. The participants of these workshops were mainly PAPs, mukhtars, local business and business organization representatives, mayor, governor, local authorities and representatives of public institutions, universities as well as some representatives from various development organisations at the national level. 146 people participated and discussions were held on rural development including forestry, agriculture and animal husbandry and urban development including education, health and other public services, culture and tourism, trade and industry, employment, mining activities, women entrepreneurship, social development and civil society. These workshops as well as other consultations held during social baseline surveys and other related plans identified an extensive list of potential areas for development. These activities also identified concrete project ideas and other initiatives which already have interest from municipalities, professional organisations, communities as well as their organisations. For example improving service capacity on areas of especially catering, housing, technical/mechanical services, improving skills and capacity of local communities to benefit from employment potentials have a good resonance in the project area. Also there are a number of rural development potential areas. These consultations also looked into potential ideas for enabling vulnerable groups. However these are potentials and need to be assessed in terms of relevancy, priority, feasibility and capacity, cost effectiveness and other aspects of strategic planning, which will be realised through needs assessment and other activities for the development of Community Development Plan.
- As it is stated in Stakeholder Engagement Plan, AIM aims at contributing to the growth and development of Hanönü . AMI's responsibilities are acting fair recruitment and giving priority to the local people, contributing the social, cultural and economic development, working to improve the educational, structural and health services in the district.
- Integrate local employment and local procurement plans with local community development needs to identify the likely dependencies or areas of over-reliance on AMI by local communities;
- Identify other complementary business and employment activities that can be undertaken by local communities and identify community-based organizations which could provide support in implementation by local communities;

- Develop an operations-phase Community Development Plan to coordinate Social Investment, Local Employment and Local Procurement based around common objectives and principles;
- Develop a Social Closure Plan as part of the overall mine closure planning that builds on the knowledge base developed;
- Develop a monitoring programme related to community development to enable tracking of investment, dependencies and outcome effectiveness.

### 5.2.2 Proposed Themes for Community Development

A number of potential themes are proposed for the Community Development Plan. These will be evaluated and used as appropriate within the operations-phase Community Development Plan. These will be assessed and identified more in detail in the Plan.

**Table 3: Proposed Themes for Community Development Expenditure**

Theme	Likely Components
Education& Training and social development	<ul style="list-style-type: none"> <li>• Supporting existing vocational training centers and aligning vocational trainings to increase employability of PAPs in the mine.</li> <li>• Other possible vocational training opportunities</li> <li>• Support for education (but not to replace activities and investment by the Government)</li> <li>• Business skills and SME support initiatives/diversifying local economy to prevent dependency</li> <li>• Initiatives for enabling vulnerable groups such as strengthening women entrepreneurship, enabling access of elderly in services, creating opportunities for youth etc.</li> <li>• Job-readiness training for AMI (but recognized trades that are transferrable)</li> </ul>
Health	<ul style="list-style-type: none"> <li>• Link to CHSS Management Plan with road safety</li> <li>• Water supply</li> <li>• Waste Management</li> <li>• Other possible initiatives concerning public health</li> </ul>

Agriculture	<ul style="list-style-type: none"> <li>• Training and skills development (in cooperation with Agricultural Directorate)</li> <li>• Other possible projects to develop capacity of production and marketing of agricultural products</li> <li>• Initiatives to complement effective delivery of Livelihood Restoration Plan (LRP)</li> <li>• Awareness raising projects</li> </ul>
“Quick impact” community projects	<ul style="list-style-type: none"> <li>• Community projects (might be “high impact” but small scale capital projects, such as school renovations, improving the infrastructure, small scale cultural and recreational support, various small scale donations to local cooperatives will also be considered)</li> </ul>

**5.2.3 Please note that the thematic areas and type of projects presented in table above are indicative and will be revised after the needs assessment. Planning Framework**

A two year Community Development Plan will be prepared. This provides a short to medium-term perspective to enable objectives to be met even if expenditure is re-allocated from year to year.

**5.2.4 The Community Development Plan will set out monitoring and evaluation of activities to be implemented under the plan to track progress and lessons learned Governance**

The Community Development Plan will be directed by AMI through consultative processes as appropriate. The details will be identified in the Community Development Plan. Key elements of the proposed approach to governance include:

- Establishment of consultative mechanism as appropriate to ensure proper engagement of stakeholders and relevant parties.(A Community Advisory Committee was already established to provide input to AMI regarding stakeholder engagement and social investment/community development. Within the plan details of functioning and engagement will be further developed,
- Clear guidance and terms of reference for these mechanism to ensure smooth functioning and avoid trust and expectation management problems;
- Transparency and public disclosure of outcomes.

**5.2.5 Investment/Selection Criteria**

Investment selection and priority-setting will be informed by the ESIA and also by the community development needs assessment (to be prepared). Priorities may evolve based on the results of ongoing monitoring.

While criteria and priorities will be defined later, they are likely to include:

- Address one of priority investment themes (see above).



- Self-sustainability.
- Enduring impacts.
- Independency on AMI
- Enabling vulnerable groups.
- Proportionality (i.e. communities with greatest impact get greatest investment).
- Leverages/facilitates action by other organizations.

### **5.2.6 Community Disclosure**

AMI will report on progress to affected communities at periodic community meetings. AMI will include an update on Community Development activities on its website. AMI will also provide progress update to the Lenders through regular E&S reports.

## **6 IMPLEMENTATION SCHEDULE**

### **6.1 Review and Revision of this Framework**

This Framework and the subsequent Management Plan will be reviewed on a minimum of a six monthly basis during construction and commissioning. During steady state operations, this Management Plan will be reviewed on an annual basis (unless otherwise indicated) and any necessary revisions made to reflect the changing circumstances or operational needs of AMI. Revision of this Framework will be the responsibility of the AMI Environmental and Community Relations Coordinator and Community Relations Team.

If material changes to operating procedures are required this Framework may be updated on an “as required” basis.

Any revisions to this Framework will be uploaded to the AMI Document Control Centre to ensure that all AMI staff have access to the latest version of this Framework.

### **6.2 Key Implementation Milestones**

Key implementation milestones related to this Framework are:

- Undertake Community Development needs assessment
- Prepare Community Development Plan

Based on the Community Development needs assessment, detailed budgets will be allocated and the overall budget will be set out in the Community Development Plan. Community Development Plan will be prepared in Q1 2018 and will be submitted at the beginning of Q2 2018.

## **7 MONITORING**

### **7.1 Overview of Monitoring Requirements**

Monitoring measures will be set out in the Community Development Plan.

#### **7.1.1 Progress and Performance Reporting**

**Details will be developed in the community development plan; however, an expected outline of reporting is as below:**

A quarterly progress reports will be prepared for submission to AMI General Manager.

#### **7.1.2 Monitoring and Evaluation of Community Development Projects**

##### **7.2 Key Performance Indicators**

Key Performance Indicators will be set out in the Community Development Plan; however, following is an overview of an expected frame for monitoring:

Each Community Development project will require a baseline status assessment, short-term evaluation and ex-post evaluation.

A short-term review will be carried out of each Community Development project by AMI. Depending on the result, activities may be adjusted after the short-term evaluation this will help to achieve stated project goals. The ex-post evaluation will be used to evaluate the overall effectiveness of each project and the long-term impact of each project.

Monitoring and evaluation of the overall plan will be detailed in the plan.

## **8 AUDIT AND REPORTING**

### **8.1 Auditing**

Auditing requirements will be set out in the Community Development Plan. However, all incidents and non-conformances identified will be reported as per the requirements of the AMI ESMS as described in the ESMS Framework Document.

### **8.2 External Auditing**

Conformance with this Framework will be subject to periodic assessment as part of the internal audit programme and separately by Project Lenders.

### **8.3 Record Keeping**

Records of audits, inspections and incidents will be managed in accordance with IAMI procedures.