**ANNEX 2. PROCEDURE FOR LAND AND REAL ESTATE ACQUISITION AT ACACIA MINING OPERATIONS**

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# Abbreviations

EIA : Environmental Impact Assessment

ESIA : Environmental and Social Impact Assessment

EBRD : European Bank for Reconstruction and Development

IFC : International Finance Corporation

PR : EBRD Performance Requirements

PS : IFC Performance Standards

RAP : Resettlement Action Plan

# Objective and Scope

The objective of the land acquisition procedure is to describe the methods and means and define roles and responsibilities pertaining to any land acquisition, in accordance with the national legislation and international standards, that is required and might be required in the future in order for Acacia Mining to conduct its operations.

The scope of the procedure concerns the roles and responsibilities of various departments of Acacia Mining Operations as well as principles and approaches and the monitoring framework, all pertaining to land acquisition.

# Roles and Responsibilities

The main roles and responsibilities that apply to the implementation of this procedure are defined below.

|  |  |
| --- | --- |
| Role | Responsibility |
| Acacia Operations Manager | * To allocate the required resources and personnel in order for the land acquisition procedure to be implemented * To provide the Operations Manager and the Board of Directors with updates on land acquisition * To monitor and supervise the transactions and procedures regarding land acquisition |
| Acacia Mining Operations Head of Public Relations Department | * To conduct negotiations and meetings on land acquisition with stakeholders except for public agencies, * To inform the Operations Manager, * To carry out the valuation and appraisal work for assets located on the impacted land, * To implement the land acquisition procedure, * To ensure the required coordination, information exchange and communication are in place within Acacia Mining Operations and between Acacia Mining Operations and external stakeholders, * To record, follow up and solve any complaints in relation to land acquisition, |
| Acacia Mining Operations Head of Relations with Public Agencies | * To have meetings with the relevant public agencies, * To obtain the required legal permissions and approvals from public agencies, * To monitor transactions and procedures, * To implement the land acquisition procedure, |
| Acacia Mining Operations Environmental Department | * To carry out biodiversity work on the impacted land or to have such work carried out, |
| Acacia Mining Operations Legal Department | * To check and approve the format and contents of all contracts, agreements and documents to be prepared from a legal point of view |
| Relevant Departments of Acacia Mining Operations | * To carry out the land acquisition procedure and transactions in line with the assignment/appointment by the Operations Manager and to prepare the relevant documents |

# Reference Documents

This procedure complies with the below-stated laws and regulations, international standards and the relevant documents of Acacia Mining Operations.

**Laws of the Republic of Turkey and the regulations related thereto**

* Constitution of the Republic of Turkey
* Land Registry Law No. 2644
* Environmental Law No. 2872
* Expropriation Law No. 2942
* Mining Law No. 3213
* Cadastre Law No. 3402
* Pasture Law No. 4342
* Forestry Law No. 6831

**International Standards**

EBRD Performance Requirements (PR)

* PR 1 - Assessment and Management of Environmental and Social Impacts and Issues
* PR 5 - Land Acquisition, Involuntary Resettlement and Economic Displacement
* PR 10 - Information Disclosure and Stakeholder Engagement

IFC Performance Standards (PS)

* PS 1 - Assessment and Management of Environmental and Social Risks and Impacts
* PS 5 - Land Acquisition and Involuntary Resettlement

**Acacia Mining Operations**

* Acacia Mining Operations Gökırmak Copper Project Relevant policies, principles and procedures
* Acacia Mining Operations Gökırmak Copper Project Environmental and Social Management Plan
* Acacia Mining Operations Gökırmak Copper Project Stakeholder Engagement Plan
* Acacia Mining Operations Gökırmak Copper Project Approved Environmental Impact Assessment (EIA) Report
* Acacia Mining Operations Gökırmak Copper Project International Environmental and Social Impact Assessment (ESIA))

# Principles and Approaches

In relation to the implementation of this procedure, Acacia Mining Operations commits itself and undertakes to act in line with the principles and approaches below.

* Acacia Mining Operations will refrain, as much as possible, from **acquiring personal land for the purpose of land acquisition** and will only acquire personal land if this is obligatory when project alternatives are concerned.
* Acacia Mining Operations will **prioritize the purchasing of land by consent based upon mutual agreement in the acquisition of personal land**. Land acquisition through expropriation will be the last resort to be opted for only in cases when it is the only remaining option after all others are exhausted.
* Acacia Mining Operations **will** make efforts **to minimize the required land acquisition.**
* Acacia Mining Operations **will refrain from physical resettlement**. Therefore, the implementation of alternative project designs which will not cause physical resettlement will be prioritized.
* In the event that land acquisition leads to physical resettlement, Acacia Mining Operations commits and undertakes to prepare and implement **a resettlement action plan that complies with international standards**.
* Acacia Mining Operations will develop and implement **measures to improve the means of livelihood** that would prevent a permanent negative impact of land acquisition on the means of livelihood and economic activities of individuals. In addition, practices will be developed to make sure such measures and practices cover and inform vulnerable groups as well as ensuring they benefit them.

# Land Acquisition

## List and Valuation of Assets

**Assets** include the impacted land itself as well as the trees and all kinds of structures and buildings (housing, appurtenant structures, etc.) thereon.

**Valuation services will be outsourced from third party agencies and/or organizations** that are specialized in their trade in order to produce a list of the assets on land, determine the quality and quantity of such assets and decisively measure the size of impacted land before land acquisition through both expropriation and purchasing by consent.

The valuation of assets will be carried out using a method that is acceptable to international institutions and organizations and the related values will be calculated over the **"perfect substitute value"**.

## Drafting the Land Acquisition Plan

Acacia Mining Operations will draft a Land Acquisition Plan at certain intervals for both the project construction and operational periods. This Plan will include a list of lands needed and of asset acquisitions completed in a way to cover annual, 3-year and 5-year periods.

Plans and lists will be updated and submitted by Acacia Mining Operations Manager each year to all relevant departments.

The Plan will include information on the types and sizes of parcels (personal, forest, public entity, village entity, etc.) affected/to be affected by land acquisition that is already completed and to be completed, the number of owners, users and assets, the size of their parcels, the payments made and the estimated future payments as well as the reason for the need (mining site, waste storage area, etc.).

Records pertaining to the land acquisition will be kept by a survey engineer to be delegated by Acacia Mining Operations Manager. The secretariat work will be delivered by the Public Relations Department. Acacia Mining Operations Manager is responsible for getting the Plan drafted.

## Types of Land Acquisition

There will be two types of land acquisition. These are;

1. Land acquisition by consent based upon mutual agreement
2. Land acquisition by expropriation.

### Land acquisition by consent based upon mutual agreement

* During the construction and operational periods, the purchasing and/or renting of lands that belong to persons and those which are owned by third party organizations (municipalities, village entities, etc.) and could be acquired through agreements will be prioritized.
* The opinion and approval of Acacia Mining Operations Legal Department will be sought for any and all legal documents (contracts, reports, declarations and letters of undertaking, etc.) to be prepared in relation to the land acquisition by consent.
* The opinion and approval of Acacia Mining Operations Legal Department will be sought for any and all legal documents (board approval, contracts, reports, etc.) to be prepared in relation to the land acquisition by consent.

#### Purchasing the Parcels of Persons/Third Party Organizations

* During the construction and operational periods, Acacia Mining Operations may purchase the parcels of persons and/or third party organizations depending on the needs of the Project.
* The process of purchasing parcels by consent will be carried out as described below.

1. The relevant department will submit to the Operations Manager the information on the land which it recommends for purchase together with the reasons for such recommendation.
2. The written/e-mail approval of the Operations Manager and, if required, of the Board of Directors will be obtained in order to purchase the said land.
3. The Operations Manager will delegate the task of initiating land purchase transactions to the Public Relations Department (PRD).
4. PRD experts will learn who the owners of the land to be purchased are according to the title deed in addition to the users of the said land.
5. PRD experts will obtain permission from the land owner and land users in order to determine the assets on the land.
6. A third-party organization will determine and valuate the assets on each piece of land. This organization will issue a report on the matter.
7. PRD experts will meet the relevant persons and organizations including but not limited to municipalities, other land owners and real estate agencies and determine alternative prices as the purchasing value for the land in consideration of the asset appraisal report and then proceed to issue a written report on the matter.
8. Three distinct variables will be taken into consideration while setting the alternative prices. These are;
   1. Proposition for estimated total land value (This variable does not consider the number of owners/shareholders and whether there are any users on the land),
   2. Proposition for estimated land value in consideration of the number of owners/shareholders (This variable considers how much money would be proposed per owner/shareholder while placing a price offer for the land. When land which has a high number of owners/shareholders is concerned, the fee per owner/shareholder might become more important than the size of land),
   3. Last but not the least, proposition for estimated land value in consideration of land users (This variable takes into consideration the land users. For instance, if the land user is one of the owners and the other owners do not use the land, the price to be proposed may be changed for the land user. In the event that the land user is not one of the land owners, the current and potential future economic losses of the user will be considered and a price will be offered to the user as well).
9. The Operations Manager will be authorized in relation to the prices to be proposed in terms of land acquisition by consent.
10. PRD experts will contact and inform the land owners and initiate the process of agreement by mutual consent.
11. If all of the land owners cannot be contacted, those land owners who are contacted will be asked to inform other owners and obtain powers of attorney indicating that they are authorized to act.
12. The maximum number of negotiation meetings for land acquisition by consent will be three per parcel. The time and place of each meeting will be notified to land owners via phone, SMS and letter/e-mail at least 15 days in advance and they will be asked to confirm their attendance. Meeting minutes will be issued for each meeting.
13. PRD will inform the Operations Manager on the proposed price by the land owners and a written/e-mail confirmation will be requested.
14. If a mutual agreement is reached, land owners will be informed on the matter in writing/via e-mail.
15. Purchasing and title deed amendment processes will be completed within one month at the latest following such notification.
16. A contract will be signed with land owners based on the existing mutual agreement.
17. Title deed registry and notary expenses and any and all relevant expenses will rest with Acacia Mining Operations.
18. In cases where the land user is not the land owner or one of the land owners, a separate fee may be set for the land user and be transferred to their account.
19. In cases where a payment needs to be made to the land user, a declaration and a letter of undertaking signed by the land user shall be taken from them.
20. Field work will start only after the land fee is deposited in the land owners' account, and a declaration as well as a letter of undertaking signed by the land user are taken from the land user.
21. Land owner(s) and/or land user(s) can harvest, take, transport and use the crops and products on the land before the field work starts.

#### Renting Privately-Owned Parcels

Acacia Mining Operations may rent privately-owned rent during construction and operational periods.

The privately-owned land will be rented by consent and based on mutual agreement.

The renting process will unfold in line with the following steps.

1. The relevant department will submit to the Operations Manager the information on the land proposed for renting as well as the reasons and duration for such renting transaction.
2. If necessary, the Operations Manager will obtain a written/e-mail approval from the Board of Directors in order to rent the said land.
3. The Operations Manager will delegate the task of initiating land rental transactions to the Public Relations Department (PRD).
4. PRD experts will learn who the owners of the land to be rented are according to the title deed in addition to the users of the said land.
5. PRD experts will obtain permission from the land owner and land users in order to determine the assets on the land.
6. Acacia Mining Operations Environmental Department will identify the biodiversity assets (tree and plant species, products and crops, total areas, etc.) to be harmed on the land to be rented and issue a report.
7. PRD experts will meet the relevant persons and organizations including but not limited to municipalities, other land owners and real estate agencies and determine the lowest and highest prices for renting the land and then proceed to issue a written report on the matter.
8. PRD experts may seek opinion from a third-party organization in order to calculate the compensation fee pertaining to the impacted biodiversity assets.
9. PRD will inform the Operations Manager on the rental fee.
10. PRD experts will contact and inform the land owners and initiate the process of agreement by mutual consent.
11. If all of the land owners cannot be contacted, those land owners who are contacted will be asked to inform other owners and obtain powers of attorney indicating that they are authorized to act.
12. Land owners and users will be asked to provide input in relation to the conditions for entering and exiting the land that will set the subject matter of the contract.
13. PRD will inform the Operations Manager on the rental offers that are obtained from land owners as well as the conditions for entering and exiting the land and seek their written/e-mail confirmation.
14. Contracts/rental contracts will be signed with land owners after the confirmation for rental procedure is obtained.
15. The agreed fee will be deposited by Acacia Mining Operations Accounting Department in the accounts of the land owners.
16. PRD experts will inform the mukhtar, neighbors and residents on the rental procedure.
17. Land owners/their legal representatives/majority of land owners as well as the land user will be requested to sign a "Land Entry Statement".
18. Field work will start only after the rental fee is deposited in the land owners' account, and any of the land owners and the land user sign the Land Entry Statement.
19. PRD experts will visit the rented land at regular intervals to meet the neighbors and residents and see whether they have any complaints.
20. When the rental term is over and the land needs to be evacuated, the land will be arranged and readied for exit during the rental term in the way that is set forth in the contract.
21. A "Land Exit Statement" will be sent to the land owners/their legal representatives/majority of land owners at least one month before the expiry of the rental contract.
22. After the land arrangement is complete, a "Letter of Undertaking and Declaration" signed by land owners/their legal representatives/majority of land owners will be obtained.
23. Land owner(s) and land user(s) can harvest, take, transport and use the crops and products on the land before the date when the relevant work is scheduled to start.

### Land Acquisition by Expropriation

Land acquisition by expropriation is the last method to opt for in land acquisition. In the following events, land acquisition by expropriation shall be made.

* Disagreement with land owners on the land price of privately owned parcels,
* Failing to reach/contact most of the owners due to high number of owners,
* High number of inheritors due to deaths of owners,
* Making public interest decision (necessary to initiate urgent expropriation processes),
* Cases that require land allotment,
* Acquisition of ownership and/or easement of the lands by public institutions (treasury, forestry, pasture lands) and third party institutions (village legal person, municipality, etc.),
* Statuses and activities regarding other related legislation that require application for expropriation.

Land acquisition by expropriation is divided into two types: ownership acquisition and easement. In easement, the ownership structure of the land does not change; but restrictions are imposed regarding its usage.

Since prices to be determined for easement do not cover ownership acquisition, full replacement cost will not be regarded in the calculation of these prices. Additionally, full replacement cost will also not be regarded in expropriation payments to be made by public institutions to institutions for lands to be constructed (forest, pasture, etc.); only requirements of the legislation will be conformed on this matter.

Acacia Mining Operations Head of Relations with Public Agencies shall be responsible for conducting actions and procedures regarding public institutions in land acquisition by expropriation processes.

Expropriation procedures shall be conducted in line with the provisions of "Normal Expropriation" (Law No. 2942). In events that require "Urgent Expropriation", Article 27 of the related Law shall serve as basis.

The land shall not be entered before expropriation prices are paid to right holders.

If the land acquisition by expropriation causes resettlement impact, a Resettlement Action Plan (RAP) shall be drafted, that complies with international standards.

In the event that land acquisition has negative socio-economical impacts on the households, a community development program shall be prepared and implemented to improve livelihood of the households.

#### Acquisition of Non-Privately Owned Parcel Lands by Expropriation

Non-privately owned parcel lands are lands of forestry, treasury, forage, non-registered third parties (municipality, village legal person) etc.

Assets on the lands to be expropriated shall be determined and assessed prior to the acquisition.

During the evaluation of the assets, the users of the non-privately owned lands shall also be determined.

Two methods shall be used in the acquisition of non-privately owned parcel lands by expropriation. These are;

1. Easement on treasury land,
2. Easement
3. Easement for free-of-charge use
4. Expropriation of immovable property of public institutions within the scope of Article 30 of the Expropriation Law,
5. Village legal persons
6. Public property (forages, fields, etc.)

Easement restricts the use of immovable property by the owners of the immovable property. In terms of expropriation of property, said immovable shall be expropriated by the related Administration and allocated for the use of the Project's owner for a certain amount of time (49 years, etc.).

* As per the Turkish legal system, no compensation payment can be made to those using the state's forage or forestry lands. However, in the event that such users are detected, as per international standards, the price for products and crops and buildings affected by the land acquisition shall be paid to the users. The land user shall provide a declaration and a letter of undertaking for the payment made.
* If households are detected to be negatively and irreversibly affected by the acquisition of public lands such as forage, treasury etc., on social and economic levels, Acacia Mining Operations may purchase another land for the household's use, as a measure. In order for the land to be purchased by the affected settlement residents, a protocol will be drafted with the Mukhtar, and the District Municipality if necessary. The purchase needs to be approved by Acacia Mining Operations Board of Management.

##### Process of Easement Acquisition on Treasury Lands

Processes regarding easement and use permit shall be carried out by the departments of General Easement and Private Easement, which run under the Ministry of Finance, Directorate of National Property. In provinces, Revenue Offices perform these processes.

##### Acquisition Process of Buildings on Treasury and Non-Registered Lands

Non-registered lands are immovable properties that are not yet registered to the land registry office or whose cadastre processes are incomplete; or that are left non-registered during cadastre activities despite being registered to the land registry office.

The procedure to be performed will be carried out as stated under the chapter ''acquisition of treasury lands''.

##### Acquisition Process of Forestry Lands

Acquisition of forestry lands will be executed in line with the Forestry Law No. 6831 and related regulations.

Acquiring temporary/preliminary and permanent permits; payment of the prices, acquiring easement and registry of determined forestry lands will be performed accordingly. Easement will be acquired for 49 years.

##### Acquirement Process of Forage Lands

The qualification and allotment of these lands should be changed, in order to be used. The Provincial Forage Commission should assent and calculate the 20-year fresh grass price; this price should be paid by the applicant to the account of the Ministry of Food, Agriculture and Livestock.

##### Expropriation Process of Immovable Properties of Institutions (Article 30 of the Expropriation Law)

Expropriation will be conducted in line with Article 30 of the Expropriation Law No. 2942.

##### Acquisition of Forage Lands as per Article 30

Acquisition of pasture lands that are qualified as public property will be carried out in line with Article 30. However, the Provincial Forage Commission should assent, calculate the 20-year fresh grass price and this price needs to be paid to related accounts in order to change the pasture qualification of the land.

##### Acquisition of Graveyard Lands as per Article 30

This procedure shall be applied in the event that there are settlements whose graveyard areas are affected by the Project. Process related to Article 30 shall be enforced on the acquisition of these graveyard areas. The graves will be moved pursuant to the Law on Protection of Graveyards No. 3998, in cooperation with Provincial Governorship, mukhtars of the villages and district municipalities.

##### Acquisition of Various Buildings as per Article 30

If there are buildings on the affected lands of village legal persons, acquisition of these asset shall be carried out as per the process related to Article 30.

### Acquisition Process of Privately-Owned Lands as per the Expropriation Law

1. Expropriation works shall be conducted in line with the Expropriation Law No. 2942.
2. Assets on the land shall be determined and evaluated prior to expropriation works.
3. Valuation process shall be calculated over the full replacement cost.
4. The difference between land expropriation price and full replacement cost shall be paid to the owner/owners that use the land.
5. Title deed registry, court and notary expenses and any and all relevant expenses shall be covered by Acacia Mining Operations.
6. In cases where the land user is not the land owner or one of the land owners, a separate fee may be set for the land user and be transferred to their account.
7. In cases where a payment needs to be made to the land user, a declaration and a letter of undertaking signed by the land user shall be taken from them.
8. Field work will start only after the land fee is deposited in the land owners' account, and a declaration as well as a letter of undertaking signed by the land user are taken from the land user.
9. Land owner(s) and/or land user(s) can harvest, take, transport and use the crops and products on the land before the field work starts.

#### Acquisition Process of Privately Owned Lands as per the Urgent Expropriation Law

According to Article 27 of the Expropriation Law, land acquisition can also be done by urgent expropriation. **Should it be necessary, urgent expropriation method may be used.**

#### Acquisition Process of Privately-Owned Immovable Property

Along with the acquisition of privately-owned lands, the buildings on these lands shall also be acquired. Just as in land acquisition, these buildings shall be acquired through expropriation.

## Land Acquisition of the Contractor and Sub-Contractor Companies

Land acquisition process to be conducted by the contractor and sub-contractor companies, during construction and operation periods of Acacia Mining Operation projects, is subject to rules and practices stated in this procedure.

The information regarding land acquisition to be conducted by the contractor and sub-contractor companies must be in the Land Acquisition Plan that will be prepared specifically for the project.

During the implementation, special provisions may be drafted, in the event Acacia Mining Operations deems necessary, regarding land acquisition conditions of contractor and sub-contractors.

# Monitoring, Audit and Reporting

Reporting, internal and external monitoring and assessment activities shall be carried out in line with the Environmental and Social Management Plan for monitoring and audit of compliance of the Project procedures and past and/or future land acquisitions with national and international standards.

The procedure shall be reviewed once a year based on the monitoring and assessment results and revisions shall be made if necessary.

# Framework of Entitlement

|  |  |  |
| --- | --- | --- |
| **No** | Category | Entitlement |
| **1** | **Acquisition of Privately Owned Parcels (Owners/shareholders with title deed)** |  |
| **1A** | Physical resettlement | * Preparing an RAP that is compliant to international (EBRD, IFC) standards. |
| **1B** | Land loss | * Prioritization of land acquisition by consent and mutual agreement |
| **1C** | Loss of Assets on the Land (Buildings, appurtenant structures, trees, etc.) | * Privately owned land acquisition as per the Expropriation Law, when needed |
|  |  | * Expropriation of lands owned by households whose agricultural land is smaller than economic integration and/or whose privately-owned land is less than 20% and that want to expropriate their lands |
|  |  | * Making a list of the assets on the lands |
|  |  | * Calculating and paying the asset prices over their full replacement cost |
|  |  | * Covering the difference between expropriation price and full replacement cost |
|  |  | * Paying additional prices to owners that use the land, when necessary |
|  |  | * Prioritizing households in local employment |
|  |  | * Covering notary, court and title deed expenses |
|  |  | * Developing and implementing a Community Development Program to improve livelihoods, when needed |
|  |  | * Assets on the land (tree, appurtenant structures, etc.) may be used by the owners and users |
| **2** | **Users with no Legal Rights/Partners (Treasury, KTK, Non-Registered lands)** |  |
| **2A** | Physical resettlement | * Preparing an RAP that is compliant to international (EBRD, IFC) standards. |
| **2B** | Land loss | * Making a list of the assets on the lands |
| **2C** | Loss of Assets on the Land (Buildings, appurtenant structures, trees, etc.) | * Determining the users of the lands |
|  |  | * Paying asset prices to the users of the land over the full replacement cost |
|  |  | * Prioritizing households in local employment |
|  |  | * Covering notary, court and title deed expenses |
|  |  | * Developing and implementing a Community Development Program to improve livelihoods, when needed |
|  |  | * Assets on the land (tree, appurtenant structures, etc.) may be used by the owners and users |
| **3** | **Non-Privately-Owned Lands and Buildings** |  |
|  | Treasury Lands and Buildings on Them | * Land and building acquisition as per the Expropriation Law |
|  |  | * Paying the price determined by the related public institutions (Revenue Office, Regional Directorate of Forestry, Provincial Directorate of Agriculture) |
|  | Public Property (Pasture) Lands | * Land acquisition as per the Expropriation Law |
|  |  | * Calculating 20-year grass price and depositing it to the account determined by the Ministry of Agriculture |
|  |  | * Purchasing new forage lands for settlement residents and/or rehabilitating pasture assets, when needed |
|  | Lands of Village Legal Persons and Buildings on Them | * Prioritization of land acquisition by consent and mutual agreement |
|  |  | * Land and building acquisition as per the Expropriation Law, when needed |
|  |  | * Paying the price for expropriation determined by the related public institutions |
|  | Graveyards | * Moving the graves to a place near the old graveyard, if available; if not, moving them to a new graveyard area |
|  |  | * Conducting the legal work and environmental arrangement for the new grave site |
| **4** | **Vulnerable groups** |  |
| **4A** | **Vulnerable groups** | Paying attention to informing especially the vulnerable groups about the Project and ensuring that they benefit from social responsibility assistances |