

STAKEHOLDER ENGAGEMENT PLAN

SAMTA METALS RECYCLING PROJECT

KENITRA, MOROCCO

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1. PROJECT BACKGROUND

Samta Metals & Alloys SA, Morocco (Samta) proposes to construct and operate a copper (Cu) and aluminium (Al) scrap recycling complex in the Atlantic Free Zone (AFZ) near Kenitra in Morocco. The complex will process industrial and sourced scrap to produce Al ingot and Cu cathode / rolled rod specifically for the automotive industry. Core to the Project rationale is the energy savings and lower carbon emissions of secondary source (ie. recycled) Cu and Al, compared to primary resource derived metals, as well as the Project location within an existing automotive industrial area that can provide both scrap inputs and product offtake. The project is currently at the start of the Engineering and Procurement phase, with the property having been acquired, and detailed design and construction contractors being identified. Samta aims to start construction by April 2024 and achieve commercial production in February 2025.

1.1 PROJECT LOCATION

The Project site is located within the Integrated Industrial Park (P2I) of Kenitra, known as the Atlantic Free Zone (AFZ), bounded to the north by the railway linking Kenitra to Sidi Yahya El Gharb, to the north-east by commercial agricultural tunnels, to the west by a tobacco treatment facility, agricultural supply depot and a commune and to the south by national road No. 4 (RN4) linking Kenitra to Sidi Yahya El Gharb, and plantations beyond. Samta purchased the ~3.8ha AFZ plot in June 2023. Central Kenitra is located ~18 km to the west of the Project site, Sidi Yahya El Gharb town is ~5 km to the east, and the settlement of Ameer Seflia is located ~2 km north-west of the Project site. Samta purchased the ~3.8ha AFZ plot in June 2023.

The AFZ is owned and operated by MedZ, a subsidiary of the state-owned financial institution Deposit and Management Fund (Caisse de Depot de Gestion), which specializes in the development of business parks. It is understood from discussions with the AFZ developer (MedZ) that the AFZ property was a commercial forestry plantation prior to becoming an industrial zone, and historical satellite imagery indicates this to be the case. In this regard, the site was historically heavily disturbed, as well as being subsequently cleared to develop the AFZ. Accordingly, the site cannot be considered greenfields.

1.2 LEGAL REQUIREMENTS

Moroccan regulation provides requirements for stakeholder engagement during the preparation of the Environmental and Social Impact Assessment (ESIA). Guidance is provided in the "Guide General de Realisation des Etudes d'Impact Environnemental et Social", Arrêté no. A/2013/474/MEEF/CAB. The guide maintains that public consultation and participation must be done before, during and after the EIES process. Further it states that the recommendations of stakeholders must be included in Minutes that must be signed by the Local Authorities.

A summary of Moroccan legislation and regulations which require stakeholder engagement is provided in the table below.

TABLE 1-1 MOROCCAN LEGAL REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

Legislation	Stakeholder Engagement Requirements
2011 Morocco Constitution	<ul style="list-style-type: none"> Article 136 of the 2011 Constitution states that "the territorial organisation ... ensures the participation of the populations concerned in the management of their affairs and promotes their contribution to integrated and sustainable human development". Similarly, article 139 states that "participatory mechanisms for dialogue and consultation shall be put in place by regional councils and the councils of other local authorities to encourage the involvement of citizens and associations in drawing up and monitoring development programmes".
Framework Law 99-12	<ul style="list-style-type: none"> Framework law no. 99-12 on the National Charter for the Environment and Sustainable Development stipulates in article 3 that "Every citizen has the right (...) to access reliable and relevant environmental information and to participate in the decision-making process likely to have an impact on the environment" It also calls on the Government and the Regions to guarantee the population participation in environmental decision-making and access to environmental information
Law 49.17 relating to environmental assessment, promulgated by Dahir n°1-20-78 of 18 hija 1441 (8 August 2020)	<ul style="list-style-type: none"> Law 49.17 relating to public consultation is still based on the decrees of law 12-03.
Law No. 12-03 relating to environmental impact studies, promulgated by Dahir No. 1-03-60 of 10 Rabii I 1424 (May 12, 2003) and its implementing decrees	<p>The requirements of Moroccan legislation on public information and consultation are mainly contained in the regulations on impact studies, in particular Decree no. 2-04-564 of 4 November 2008 setting out the procedures for organising and conducting the public enquiry into projects subject to environmental impact studies. A summary of these requirements is provided below.</p> <ul style="list-style-type: none"> Moroccan law requires a 20-day public enquiry, during which the population, informed in advance by the Ministry's regional services through press publications, is invited to consult the social and environmental project documentation (including a non-technical summary) and to provide their observations in a register, which will then be taken into account in the commission's final report. By making the summary of the EIA available, the public enquiry enables the population concerned to find out about the possible repercussions of the project on the environment and their mitigation measures, and to gather their comments and proposals. Moroccan regulations do not specifically require public meetings, although they are not outlawed. In practice, most major projects not only provide the public with project documentation, but also organise information meetings and consultations as part of public enquiries. <p>Details of the main provisions of this decree and associated requirement of the public enquiry process are presented in Appendix A.</p>
Law No. 13-03 Air Pollution Control	<ul style="list-style-type: none"> See below decree 2-09-286 of 8 December 2009 (BO n° 5806 of 21 January 2010) Air quality standards and air quality monitoring procedures.
Article 47 of law 11-03 relating to	<ul style="list-style-type: none"> Article 47 of Law 11-03 deals with noise and odour pollution and stipulates that noise and sound vibrations, whatever their origin and nature, which are likely to cause a nuisance to neighbours, harm human health or damage the environment in general, in

Legislation	Stakeholder Engagement Requirements
the protection and the enhancement of the environment	<p>particular when carrying out production and service activities, operating machinery and equipment and using alarms and loudspeakers, must be eliminated or reduced in accordance with the legislative and regulatory provisions adopted in application of this law. These provisions set the permissible noise limits, the cases and conditions in which any vibration or noise is prohibited, as well as the measurement systems and means of control.</p> <ul style="list-style-type: none"> Article 49 of Law 11-03 describes the instruments for managing and protecting the environment and stipulates that when the implementation of developments, works or projects is likely, because of their size or impact on the natural environment, to harm the environment, the project owner or applicant for authorisation is required to carry out a study to assess the environmental impact of the project and its compatibility with environmental protection requirements. To this end, a public enquiry is mandatory.
Decree No. 2-09-286 of December 8, 2009 (BO No. 5806 of January 21, 2010) Air quality standards and air monitoring procedures	<ul style="list-style-type: none"> Decree no. 2-09-286 of 20 hja 1430 (8December 2009) setting air quality standards and air monitoring procedures decrees in Chapter 2, Article 6 that information thresholds, alert thresholds and emergency measures shall be set by joint order of the minister responsible for energy, mines, water and the environment, the minister responsible for health and the minister responsible for the interior, after consulting the minister responsible for equipment and transport and the minister responsible for industry, mines, water and the environment, the Minister for Health and the Minister for the Interior, after consultation with the Minister for Infrastructure and Transport and the Minister for Industry, and in article 7, it stipulates that the application of the emergency measures provided for in the joint order mentioned in article 6 above is ordered by decision of the governor of the prefecture or province or the wali of the region concerned and that this decision determines in particular the nature of the information to be provided to the public and the means of communication to be used. Also in Chapter 3 on air quality monitoring networks, it is stipulated in Article 12 that the permanent air quality monitoring and surveillance committee is chaired by the wali of the region or his representative. It is made up of a representative of the regional departments of the government authorities responsible for energy, mines, water and the environment, health, equipment and transport, industry and trade and crafts, and that this committee may be joined in an advisory capacity by representatives of the professional associations and bodies concerned, scientific establishments, environmental protection associations in the region concerned and any qualified person.
Decree No. 2-14-85 of 28 Rabii I 1436 (January 20, 2015) Management of hazardous waste	<ul style="list-style-type: none"> For any specialised hazardous waste treatment facility, Chapter IV on the storage, treatment with a view to elimination or recovery of hazardous waste stipulates that the applicant must submit an application for authorisation, accompanied by the documents mentioned in the form and a file containing, among other things, a copy of the environmental acceptability decision, This means that each specialised hazardous waste treatment facility is subject to a public enquiry, in accordance with decree no. 2-04-564 of 4 November 2008 setting out the procedures for organising and conducting the public enquiry into projects subject to environmental impact assessments.
Dahir of January 12, 1955 Regulating Gas Pressure Appliances	<ul style="list-style-type: none"> According to the Order of the Director of Industrial Production and Mines of 14 January 1955 laying down certain procedures for implementing the Dahir of 12 January 1955 regulating gas pressure equipment, as supplemented by order no. 436-73 of 10 rebia I 1393 (14 April 1973) and amended by order no. 484-75 of 24 rebia I 1395 (7 April 1975) and order no. 181-80 of 18 Safar 1400 (07 January 1980), supplemented by order no. 1184-85 of 26 Rebia I 1406 (9 December 1985) and amended by order no. 941-07 of 23 rabii II (11 May 2007): <ul style="list-style-type: none"> Article 2 of Title I: Identity and Service Marks stipulates that the various capacities, other than piping, of any new appliance submitted for testing must bear either on the metal or on a plate fixed by means of rivets or welding, the following identity marks: name of manufacturer, place, year and serial number of manufacture, internal volume of the appliance and pressure of

Legislation	Stakeholder Engagement Requirements
	<p>the first test preceded by the letters PE and expressed in hectopiezes. Only the latter mark is required for piping. Shrink-wrapped equipment must also be marked Shrink-wrapped.</p> <ul style="list-style-type: none"> Article 22 of Title III: Special provisions for butane-laden containers, stipulates that owners must be notified, either by fax or, failing that, by registered letter with acknowledgement of receipt, by the filling centres of batches of containers that have been reformed. They have a period of (15) fifteen days from receipt of the notice to come to the filling centre to see the state of the containers that have been reformed and, if necessary, to call upon an approved expert of their choice to carry out a counter-assessment.
General Construction Regulations (RGC) and Thermal Construction Regulations in Morocco (RTCM)	<ul style="list-style-type: none"> The implementing decree for law no. 47-09, General Building Regulations setting out the energy performance of buildings, 2015, aims to reduce the heating and air-conditioning requirements of all new residential and tertiary buildings. It adopts a prescriptive approach for buildings with opening ratios (ratio of the surface area of glazed openings to the total surface area of facades) of less than 45%, and a performance-based approach for other buildings. The technical specifications relate to the heat transfer coefficients of the building walls. To obtain planning permission, the project owner is required to submit a Technical File on the thermal performance of the proposed building, proving compliance with the regulations. The Moroccan Thermal Building Regulations (RTCM) set performance levels for the components of the building envelope. The RTCM also defines the minimum energy performance of heating, ventilation and air-conditioning (HVAC) systems, thereby promoting efficient, high-quality equipment. The RTCM applies only to the housing sector, the tertiary sector and the minimum performance of heating, ventilation and air-conditioning systems with a cooling capacity of less than 20 kW.
Law No. 65-99 relating to the Labor Code	<ul style="list-style-type: none"> Article 42 of the law stipulates that the employer is required to take all necessary measures to protect the safety, health and dignity of employees in the performance of the tasks they carry out under his direction, and to ensure that the rules of good conduct, good morals and good character are maintained in his company. He is also required to inform employees in writing, at the time of recruitment, of the provisions relating to the following areas, as well as any changes made to them: <ul style="list-style-type: none"> the collective labour agreement and, where applicable, its content; working hours; weekly rest periods; legal provisions and measures to protect health and safety and prevent machine-related risks; the date, time and place of pay; the registration number with the National Social Security Fund; the insurance organisation insuring them against accidents at work and occupational illnesses.
Law 06-03 on occupational accidents	<ul style="list-style-type: none"> The employer must post a summary of law 06-03 on accidents in the workplace. This notice must also contain the name and address of the insurance company, as well as the regional or provincial office responsible for employment and its address.
Law No. 18-12 on workers compensation	<ul style="list-style-type: none"> The employer must post a summary of law 18-12 in the workplace and must also post the name and address of the insurance company as well as the regional or provincial office responsible for employment and its address.
Law (30-05) on transport of	<ul style="list-style-type: none"> According to article 22 of law 30-05, all those involved in the transport of dangerous goods by road must take all the necessary measures, in accordance with the provisions of this law, depending on the nature and extent of the foreseeable dangers, in order

Legislation	Stakeholder Engagement Requirements
dangerous goods by roads	to avoid any damage to people, property or the environment as a result of the transport of dangerous goods by road, and, where appropriate, take all the necessary measures to minimise the effects. When the safety of transport or public safety is threatened or is likely to be threatened during the carriage of dangerous goods by road, the party involved who becomes aware of this threat must immediately notify the competent authorities and the other parties involved in the transport operation concerned and provide them with the information in his possession.
Law No. 42-16 approving the Paris Agreement on climate change	<ul style="list-style-type: none"> This law includes a single article approving the Paris Agreement on climate change. The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21, the United Nations Climate Change Conference in Paris, France, on 12 December 2015. It entered into force on 4 November 2016. Its overarching goal is to keep "the increase in global average temperature well below 2°C above pre-industrial levels" and to continue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels."
Law No. 47-09 on energy efficiency	<ul style="list-style-type: none"> The purpose of this law is to increase energy efficiency in the use of energy sources, avoid waste, reduce the burden of energy costs on the national economy and contribute to sustainable development. Its implementation is based primarily on the principles of energy performance, energy efficiency requirements, energy impact studies, mandatory energy audits and technical control. It also aims to integrate energy efficiency techniques into all sectoral development programmes in a sustainable manner, to encourage industrial companies to rationalise their energy consumption, to make energy audits more widespread, to put in place energy efficiency codes specific to the different sectors, to promote the development of solar water heaters, to generalise the use of low-consumption lamps and appropriate equipment for public lighting, and so on.
Conventions of the International Labor Organization ratified by Morocco	<ul style="list-style-type: none"> Right to Organize and Collective Bargaining Convention (1949) (No. 98) Forced Labor Convention (1930) (No. 29) Abolition of Forced Labor Convention (1957) (No. 105) Minimum Age Convention (No. 138) (1973) Worst Forms of Child Labor Convention (1999) (No. 182) Equal Remuneration Convention (1951) (No. 100) Discrimination (Employment and Occupation) Convention (1958) (No. 111)
Law 113-14 on municipalities	<ul style="list-style-type: none"> It confers broad powers on municipalities in terms of development, spatial planning and management, on the one hand, and environmental protection, on the other. In terms of the environment, the municipality shares powers with the State in the following areas (1) environmental protection, (2) preservation and development of the specific characteristics of the local cultural heritage, (3) management of the coastline located within the municipality's territory, (4) development of beaches, ledges, lakes and riverbanks, (5) maintenance of schools and health centres, (6) combating the vectors of communicable diseases, (7) combating all forms of pollution and degradation of the environment and natural balance. Article 100 of the law stipulates that the President of the Communal Council shall exercise administrative police powers, by means of regulatory decrees and individual police measures, involving authorisation, injunction or prohibition, in the areas of hygiene, public health and tranquillity and the safety of passageways. Among its duties, "it is responsible for the hygiene and sanitation of homes and roads, the drainage of sewers, the elimination and repression of the storage and disposal of refuse in inhabited areas".

1.3 EBRD PERFORMANCE REQUIREMENTS

The European Bank for Reconstruction and Development (EBRD) Performance Requirements (PR) consist of 10 requirements, all of which are to be met by projects financed by the Central to these requirements is the application of mitigation hierarchy and good international practice. PR10: Information Disclosure and Stakeholder Engagement, requires the creation of a stakeholder engagement plan (SEP) and recognizes the importance of open and transparent engagement between the client, its workers, worker representatives, local communities and persons affected by the project and where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship. This PR applies to all projects, which at a minimum must carry out project disclosure, identification of and engagement with stakeholders, and development and implementation of a grievance mechanism. The objectives of the performance requirement are to:

- Outline a systematic approach to stakeholder engagement that will help the client build and maintain a constructive relationship with their stakeholders;
- Provide means for effective and inclusive engagement with project stakeholders throughout the project cycle;
- Ensure that appropriate environmental and social information is disclosed and meaningful consultation is held with the project's stakeholders and where appropriate, feedback provided through the consultation is taken into consideration; and
- Ensure that grievances from stakeholders are responded to and managed appropriately.

The table below provides an overview of the requirements of PR10.

TABLE 1-2 PR10 INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT OVERVIEW

Requirement	Overview
Stakeholder engagement requirements	<ul style="list-style-type: none"> • Stakeholder identification and analysis • Stakeholder engagement planning • Disclosure of information • Meaningful consultation • Implementation of a grievance mechanism • Ongoing reporting to relevant stakeholders
Information disclosure requirements	Conduct stakeholder engagement based on providing stakeholders with access to timely, relevant understandable and accessible information in a meaningful, effective, inclusive and culturally appropriate manner and free from manipulation, interference, coercion, intimidation and retaliation.
Stakeholder engagement timeline	Stakeholder engagement will begin as early as possible in the project development and will continue throughout the project life cycle. The nature and frequency of stakeholder engagement at all phases of the project development will be proportionate to the nature and scale of the project, its potential adverse environmental or social risks and impacts and the level of stakeholder interest.
Legal requirements	The project will comply with the applicable requirements of national law with respect to public information and consultation, including those laws implementing host country obligations under public international law.
Roles and responsibilities	The project will define clear roles, responsibilities, and authority as well as designate specific personnel for the implementation and monitoring of stakeholder engagement activities

1.4 BEST PRACTICE GAP ANALYSIS

The following table shows the differences between Moroccan regulations and international best practice.

TABLE 1-3 GAPS BETWEEN MOROCCAN REGULATIONS AND INTERNATIONAL BEST PRACTICE

Subject	Moroccan Regulations	Best Practice	Measures to be taken
Stakeholder participation plan	Not required by EIA regulations	Mandatory	<ul style="list-style-type: none"> • Draw up a stakeholder participation plan (this document) • Publication of the plan
Public consultation for the ESIA	Moroccan law requires the EIA documentation to be available to the public in the communes affected by the project (with notification in local newspapers) as the public enquiry is conducted over 20 days, but it does not require public meetings or similar consultations. However, in Morocco, it is common for such meetings to be organised for major projects, even if they are not strictly required by the regulations.	Consultation is required at the planning stage (allocations) and then on the basis of a draft ESIA report. Simply providing documentation without any proactive consultation measures is considered insufficient.	<ul style="list-style-type: none"> • Organise interviews and focus groups with directly affected stakeholders. • Ensure effective disclosure of information. • Further consultation following publication of the ESIA Disclosure Documents.
Registration and complaints management system	No specific requirements	Set up a system to register and handle complaints	<ul style="list-style-type: none"> • Set up a system to register and handle complaints
Pay particular attention to vulnerable groups in relation to consultation and information activities	No specific requirements	Take into account the specific needs of the most vulnerable groups	<ul style="list-style-type: none"> • Ensure that all vulnerable people likely to be affected by the project are identified • Use appropriate disclosure and engagement mechanisms to ensure meaningful participation of vulnerable groups

1.5 STAKEHOLDER ENGAGEMENT PRINCIPLES

The following principles will be applied to stakeholder engagement:

- The Project will present information to all stakeholders in a culturally appropriate format and style of language tailored specifically to the target group.
- Project affected people will be involved early on in the decision-making process to develop mitigation measures and adapt the design wherever possible.
- Government authorities at national, regional and local levels will be consulted and project information and updates will be provided regularly.
- Partnerships will be developed with a variety of NGOs and local associations covering a range of issues.

- On-going communication and participatory consultation will be established throughout the lifetime of the Project.
- Responsibilities and accountability for stakeholder engagement within the company will be established.
- The project will aim to be inclusive and two-way communication channels will be developed.
- Accurate documentation will be kept, including stakeholder mapping rated by category, activity and relationship, communication registers, minutes of meetings and other tools.
- Lenders and relevant Government authorities will be engaged on performance monitoring outcomes, incidents and any changes to the Project's scope, design or operation that may materially change its environmental and/or social risks and impacts.

2. STAKEHOLDERS

2.1 DEFINITION

Stakeholders are defined as people or groups who are interested in, affected by, or can affect the outcome of a project. Stakeholders may be individuals, interest groups, government agencies, non-governmental organizations, financial or corporate organizations. They may include politicians, commercial and industrial enterprises, labour unions, academics, religious groups, national social and environmental groups, public sector agencies and the media.

2.2 STAKEHOLDER IDENTIFICATION

Samta has developed a stakeholder mapping tool to analyze and rate all stakeholders based on the following criteria:

- Risk level;
- Level of influence;
- Relationship; and
- Mitigation measures for each stakeholder identified.

The tool requires that stakeholder mapping be a continuous process where new stakeholders are mapped as and when identified, and that the overall stakeholder map be reviewed every 6 months.

Stakeholder mapping for the Project is ongoing. Samta will identify Project stakeholders as follows:

- Identification of individuals, groups, local communities and other stakeholders who may be affected by the Project positively or negatively and directly or indirectly, especially those directly and negatively affected by the project activities, including those who are in disadvantaged or vulnerable situations;
- Identification of a wider range of stakeholders who can influence the outcome of the project through their knowledge of the affected communities or political influence on them;
- Identification of stakeholders legal representatives, including elected officials, non-elected community leaders, leaders of informal or traditional community institutions, and elders in the affected communities, and
- Compilation of impact area maps and plotting the affected communities within the geographical territory, which should assist in defining or updating the project footprint.

The methodology for identifying vulnerable households consists of establishing criteria by correlating quantitative criteria, such as level of income with social vulnerability. The methodology is based on the Multidimensional Poverty Index (MPI), a composite statistical indicator used by the United Nations Development Programme and the World Bank's multidimensional measure of

poverty. It is also structured around the three essential factors of production in rural communities (human capital, agricultural land, and economic nets) and a composite factor measuring living conditions by integrating non-monetary elements (e.g. mosquito net use, access to electricity). The parameters to identify vulnerable households are outlined below.

TABLE 2-1 VULNERABILITY PARAMETERS

Factor	% of indicator	Indicator	Weighting
Economic nets	30%	Economic diversity	10%
		Support from nationals	7.5%
		Livestock ownership	7.5%
		Stable youth employment	5%
Human capital	25%	Percentage of valid arms in the household	10%
		Adult literacy	10%
		Percentage of adults trained	5%
Living conditions	25%	Quality of housing	7.5%
		Access to electricity	7.5%
		Use of nets	5%
		Possession of motorised devices	5%
Farmlands	20%	Access to productive land	10%
		Land tenure security	10%

2.3 CATEGORISATION

The following stakeholder categories have been identified for the Project.

TABLE 2-2 STAKEHOLDER CATEGORISATION

Stakeholder Category	Description
Local communities	<ul style="list-style-type: none"> Ameur Seflia local commune
Local authorities	<ul style="list-style-type: none"> Ameur Seflia Local Authorities Kenitra Provincial Authorities Rabat-Salé-Kénitra Regional Authorities
Representatives of the local population	<ul style="list-style-type: none"> President and elected representatives of the commune of Ameur Seflia
National government	<ul style="list-style-type: none"> Environment Department: through the Environmental Control Division, verifies, among other things, compliance with the provisions of environmental regulations by the company's organisations. Once the environmental certificate has been issued by the CNEI or CREI, this Division is responsible for monitoring and detecting breaches of environmental laws and requirements once a project has been commissioned. Ministry of Industry and Trade, which issues authorisations for industrial units. Ministry of Justice: responsible for the operation of the courts involved in resolving disputes.

Stakeholder Category	Description
Other Government Administrations	<ul style="list-style-type: none"> • Commission Régionale Unifiée d'Investissement (CRUI) ; • Representatives of the main ministries at regional level on the CRUI: <ul style="list-style-type: none"> ◦ Regional Department for Infrastructure and Water ; ◦ Regional Transport Directorate ◦ Sebou Water Basin Agency; ◦ Regional Department of Town Planning ◦ Regional Tourism Directorate ◦ Energy and Mines ◦ Regional Department of Health ◦ Regional Department of Agriculture and Maritime Fishing; ◦ Regional Department of Trade and Industry; ◦ Regional Directorate for Water and Forests; ◦ Regional Directorate for Culture;
Lenders	<ul style="list-style-type: none"> • Financial institutions
AFZ Administration	<ul style="list-style-type: none"> • MedZ
Associations	<ul style="list-style-type: none"> • AFZ tenants • Metals recycling associations • Others to be identified as relevant
Labour	<ul style="list-style-type: none"> • Contractors • Labour unions • Staff • Chamber of commerce and industry: made up of business leaders elected by their peers.
NGOs	<ul style="list-style-type: none"> • To be identified by Samta.
Local Businesses	<ul style="list-style-type: none"> • To be identified by Samta.
Media	<ul style="list-style-type: none"> • National and local media (tv, radio and print).
Stakeholders directly affected by the project	<ul style="list-style-type: none"> • Residents who will be affected by the works and the nuisance during operation; • Waste suppliers and future customers

2.4 STAKEHOLDER DATABASE

Stakeholders (identified through stakeholder mapping) will be registered in a Stakeholder Log which will contain full stakeholder details, including preferred methods of communication and language, and will be updated by the Social Superintendent regularly in cooperation with other departments.

Based on the outcome of the stakeholder mapping and categorization, a stakeholders matrix will be maintained which captures the strategic importance of each stakeholder and the overall approach to engagement management as per the template below:

TABLE 2-3 STAKEHOLDER MATRIX TEMPLATE

Stakeholder	Engagement objective	Area of interest / implication for strategy	Engagement & disclosure management program	Relationship Manager
Kingdom of Morocco	Keep and potentially improve the support for the Project at the Presidential level	<ol style="list-style-type: none"> 1. Ensuring all levels of the executive power are supportive and cooperative in the Project development. 2. Create job opportunities and new infrastructure for the country 3. Receiving royalties// tax revenue 4. Diversification of the economy 	<ol style="list-style-type: none"> 1. Keep close communication with Ministers and other indirect channels that are in close communication with President's Office 2. Send regular project briefings 	CEO
Ministry of Environment	Minimize the potential for Project disruption and delays due to Government approvals and permitting	<ol style="list-style-type: none"> 1. Environmental approvals and licenses Image of the country as a model for Environmental Protection and sustainable business. 2. Environment protection laws 	<ol style="list-style-type: none"> 1. Meet regularly to discuss procedures, review timeline, review progress, update on findings from EIES 2. Send regular project briefings 3. Send annual reports 	EHS Manager
Ministry of Land	Keep and potentially improve the support for the Project at the Ministerial level to ensure land access is granted	<ol style="list-style-type: none"> 1. Declaration of PIN. 2. Support land acquisition for the resettlement 	<ol style="list-style-type: none"> 1. Send regular project briefings 2. Send annual reports 3. Meet on a quarterly basis 	Director General
Governor of Kenitra	Keep and potentially improve the support for the Project at the Local Authority level	<ol style="list-style-type: none"> 1. Impacts to infrastructure within regional – roads, accommodation, basic services (water, waste), emergency services, ambulance, fire, etc.) 2. Impact to regional economy 3. Employment opportunities for residents and Local Content Strategy 4. Impacts to communities' lifestyle 5. Impact on the cost of living 	<ol style="list-style-type: none"> 1. Meetings as needed with relevant personnel 2. Consultation through legal processes. 3. Invitation to visit camp 4. Send regular project briefings 5. Send annual report 	Director General
Préfet of kenitra	Keep and potentially improve the support for the Project at the Local Authority level	<ol style="list-style-type: none"> 1. Impacts to infrastructure within prefecture – roads, accommodation, basic services (water, waste), emergency services (ambulance, fire, etc.) 2. Impact to regional economy 3. Employment opportunities for residents 4. Impacts to communities' lifestyle 5. Impact on the cost of living 6. Impact on the prefecture responsibilities 7. Local Content Strategy 	<ol style="list-style-type: none"> 1. Meetings as needed with relevant personnel 2. Consultation through legal processes. 3. Invitation to visit camp 4. Send regular project briefings 5. Send annual report 	Director General

Stakeholder	Engagement objective	Area of interest / implication for strategy	Engagement & disclosure management program	Relationship Manager
Sous-Prefectures , Commune Urbaine de Kenitra	Keep and potentially improve the support for the Project at the Local Authority level	<ol style="list-style-type: none"> 1. Impacts to infrastructure within prefecture – roads, accommodation, basic services (water, waste), emergency services (ambulance, fire, etc.) 2. Impact to regional economy 3. Employment opportunities for residents 4. Impacts to communities' lifestyle 5. Impact on the cost of living 6. Impact on the prefecture responsibilities 7. Local Content Strategy 	<ol style="list-style-type: none"> 1. Routine meetings with sous prefects and other members 2. Attendance and presentations 3. Grievance mechanism in place (tracking & response) 4. Send regular project briefings 5. Send project brochure 6. Invitation to visit camp 	Director General
Employees	Ensure they are equipped with accurate information	<ol style="list-style-type: none"> 1. Continued employment 2. Benefits to local communities 	<ol style="list-style-type: none"> 1. Provide updated key messages on a regular basis 2. Heads of department can also read them with staff 	HR Manager
Other community members	Ensure that all potentially affected persons are aware of the Project and understand the legal procedures to be followed (EIES)	<ol style="list-style-type: none"> 1. Project's environmental performance 2. Employment opportunities 3. Impact to local economy 4. Impact to social fabric 5. Increased cost of living 6. Ensuring that local residents are prioritized for benefits (investments, employment, etc.) 	<ol style="list-style-type: none"> 1. Community-wide meetings/presentations 2. Notice board 3. Grievance mechanism in place (tracking and response) 	EHS Manager
Conservation groups (e.g. NGOs such as Renatura, WCS, CI)	<ol style="list-style-type: none"> 1. Minimize the potential of Project disruption or delays due to protesting the Project, objections, poor media. 2. Obtain support from specific NGOs 	<ol style="list-style-type: none"> 1. Project's environmental performance 2. Impacts to endangered species and biodiversity 3. Long-term impacts 4. Impacts on water quality 5. Mine closure issues – post-mine land use 	<ol style="list-style-type: none"> 1. Meetings and consultation 2. Consult during EIES process 3. Civil society forums 4. Sector specific studies 5. Grievance mechanism in place (tracking and response) 6. Site visits 	EHS Manager
Research and educational institutions	Get maximum benefit from existing research and educational institutions	<ol style="list-style-type: none"> 1. Agricultural development 2. Bio-diversity research 3. Career and skills development 	<ol style="list-style-type: none"> 1. Meetings and communication as required 2. Recruitment program for University Graduates (National level) and high school graduates (Prefet and s/p level) 	Plant Manager
Shareholders and partners	Shareholders and partners	<ol style="list-style-type: none"> 1. Project's SHEC and operational performance 2. Returns on investment 3. Meeting budgets and production capacity 	<ol style="list-style-type: none"> 1. Audits (SHEC, insurance, risk) 2. Site tours 3. Meeting and on-going communication 4. Shareholder and partner report 	Director General

Stakeholder	Engagement objective	Area of interest / implication for strategy	Engagement & disclosure management program	Relationship Manager
Media	<ol style="list-style-type: none"> 1. Use the media to project a positive image of the project. 2. Develop contacts with key members of the media to ensure an accurate message is transmitted 	<ol style="list-style-type: none"> 1. Impacts to local area – infrastructure, employment, regional economy, community way of life, cost of living/lifestyle, support services 2. Socio-economic impacts and opportunities 3. Source of funding for infrastructure investments 4. Environmental impacts (water, biodiversity, air pollution, resources management) 5. Operational developments 6. Employment opportunities 7. Revenue raised for the State (royalties and taxes) 	<ol style="list-style-type: none"> 1. Actively engage media –search for opportunities to provide them key messages 2. Prepare press releases Invite them to milestone events 3. Use media to publicise key dates, explain processes and announce approvals 	HR Manager
Ministry of Industry	Minimize the potential for Project disruption and delays due to Government approvals and permitting	<ol style="list-style-type: none"> 1. Ensuring Project advances to construction and production phase 2. In charge of the Project on behalf of the Government 	<ol style="list-style-type: none"> 1. Meet regularly to discuss progress and review timeline together and identify potential delays 2. Send project briefings 3. Send quarterly and annual reports 	Director General
Ministry of Investment	Keep Informed the progress of the project to Investment ministry level to get the Subsidy investment as per project completion schedule.	<ol style="list-style-type: none"> 1. Ensuring Project advances to construction and production phase 2. Communication of the progress of the project 	<ol style="list-style-type: none"> 1. Meet regularly to discuss progress and review timeline together and identify potential delays 2. Send project briefings 3. Send quarterly and annual reports 	Director General
Customers and supplier	Supply of Raw material and sell the finished material	<ol style="list-style-type: none"> 1. Ensuring the timely and as per defined quality, supply the raw material for the process 2. Ensuring the timely delivery of the finished goods as per defined quality to customer 	<ol style="list-style-type: none"> 1. Keep close communication with customer and supplier with the plant operation head. 2. Meet regularly to discuss quality, any deviation, customer complains etc. 	COO

2.5 VULNERABLE GROUPS

Samta is committed to ensuring specific measures will be established to ensure affected vulnerable households are integrated into the project's engagement process. Should vulnerable groups be identified during stakeholder mapping, the following measures will be implemented as necessary:

- Meetings at the home of the vulnerable person / household or another mutually convenient location;
- Support in understanding the grievance mechanism;
- Development of livelihood community programs that are suitable for vulnerable households;
- Transportation assistance to project related meetings and capacity building programmes; and
- Assistance in opening bank accounts.

3. ENGAGEMENT

3.1 PREVIOUS CONSULTATIONS

Previous consultations with the public and Government stakeholders took place as required by the ESIA process and as part of project planning.

TABLE 3-1 PREVIOUS PROJECT CONSULTATIONS

Consultation type	Details of consultation	Timeframe
ESIA public enquiry	A Public Consultation Process was conducted as part of the ESIA process. This included a public inquiry in the municipality of Ameer Sefia comprising advertisement of the project in two newspapers, as stipulated by the ESIA regulatory procedures. No objections to the project were received.	5 September 2023 – 25 September 2023
Focused stakeholder engagements	Meetings and formal communications with MedZ (AFZ Management Agency) throughout project planning and land acquisition.	December 2022- July 2023
	Authorization to settle in a free zone from the Governor of Rabat	February 2023- July 2023
	Granting for subsidy of Investment Agreement with the AMDIE/Ministry of Industry.	Oct 2022- Dec 2022
	Granting for subsidy of Investment Agreement with the AMDIE.	July 2023- Feb 2024
Environmental Authorisation process	Engagement with Env Agency comprising submission of ESIA application and ESIA reporting documentation as well as ongoing communication throughout the ESIA process.	July 2023-Jan 2024
Other government authority engagement	Construction approval of Plant & Civil structures	Jan 2024-March 2024
	Approval for storage of Natural Gas/Propane.	April 2024-Aug 2024
	Approval of Operation of a backup Diesel Generator	July 2023-Jan 2024
	Water Supply from ONEE grid	Feb 2024-April 2024
	Power Supply from ONEE Grid	Feb 2024-April 2024

3.2 DOCUMENT DISCLOSURE

Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the Project. The Project will provide the following information to stakeholders:

- Purpose, nature, scale and duration of the project;
- Risks to, and potential impacts on, stakeholders and proposed mitigation plans highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and differentiate measures to mitigate these;
- The stakeholder engagement process, and opportunities and ways in which stakeholders can participate;
- The time and venue of any envisaged public consultation meetings, and the process by which meetings are notified, summarised, and reported; and
- The process by which any grievances will be managed.

Document disclosure will be in a manner that is accessible and culturally appropriate and take into account any specific needs of the group. Information disclosure with Moroccan stakeholders will be in French and/or Arabic, as appropriate. In this regard, Table 3-2 below presents Samta's wider Moroccan information disclosure plan (as potentially relevant to the Project).

TABLE 3-2 SAMTA MOROCCO DISCLOSURE PLAN

Means of Engagement	Information to be disclosed	Timeframe
Dedicated website for the Project in English and French (possibility of a facebook group)	ESIA Executive Summary and Project Description. SEP. Commitment Register. Newsletter, brochures, grievance mechanism, and other public information.	As soon as documents have been validated. To be maintained throughout Project lifetime.
Participatory Monitoring Community Unit	Participation in the scheduled water, noise and air quality monitoring.	During operations.
Theme specific brochure to be disseminated in the villages and posted on the community boards and a semi-annual newsletter.	Brochures, Newsletter and other written documentation.	2 times a year (newsletter) and as required by the communities and the Project.
Information sessions safety, health, environment and conservation.	Traffic safety, sanitation, health, environment conservation, fire awareness.	During construction and operations.
Focus group discussions	Theme specific.	During construction and operations.
Individual discussions (e.g. vulnerable households).	Theme specific.	During construction and operations.
Information sessions with SMEs regarding qualifications and local content.	Project procurement requirements and conditions (e.g. health and safety)	Immediately

Means of Engagement	Information to be disclosed	Timeframe
Public information and consultation meeting	Opening, presentations and introduction of the purpose of the meeting by the local authorities; Presentation by the project promoter (e.g. of certain technical aspects of the project, the impact study, etc.), possibly assisted by the specialist consultants who prepared these studies.	After the ESIA has been completed and before construction work begins.
Information desk at company headquarters	ESIA documents	Throughout the PP engagement process.

3.3 INFORMATION SHARING

Stakeholders will be notified, and information may need to be shared with stakeholders, in the following scenarios:

- Legislated engagement triggered by Project activities;
- Changes to Project scope which may have E&S impacts or require engagement as part of legislative or Lender requirements;
- Incident management or responses to grievances; and
- Stakeholder engagement programmes (e.g. grievance mechanisms, ongoing engagement programmes).

The Project will maintain a table or list of meetings, activities or opportunities for comment, specifying the following for any such events:

- Reasons for engagement;
- Consultation / comment period;
- Relevant stakeholders;
- Means of notification;
- Locations and dates;
- Information shared; and
- Links to minutes of meetings and comments received.

The table below lists the type of notification to be used for each stakeholder group. The Stakeholder database will include the contact details and preferred method of communication for each stakeholder.

TABLE 3-3 MEANS OF NOTIFYING STAKEHOLDERS OF ENGAGEMENT PROGRAMMES

Engagement Type	Method of Notification
Public consultation	<ul style="list-style-type: none"> • Notification through media including online platforms, local notice boards, radio and print media (local, regional and/or national as appropriate). • Mobile text message or delivered notices to registered Interested and/or Affected Parties.
Public disclosure & feedback	<ul style="list-style-type: none"> • Online and physical documents at agreed and publicized locations.
Government consultation	<ul style="list-style-type: none"> • Written (email or delivered notice) communications through official channels. • Direct communication with relevant assigned Government case officers.

Engagement Type	Method of Notification
Committees & focus groups	<ul style="list-style-type: none"> • Written (email or delivered notice) communications. • Direct communication with committee and group members.
General information panels and grievance boxes	<ul style="list-style-type: none"> • Online and physical documents at agreed and publicized locations.

4. GRIEVANCE MECHANISM

4.1 OBJECTIVES OF THE GRIEVANCE PROCEDURE

Samta has prepared a grievance procedure to formalise a system to handle grievances received from communities, individuals, NGOs and the local government. It also aims to ensure grievances are treated efficiently and in a transparent manner. The procedure will be shared and implemented internally within the project and with all project staff, community members and their local representatives. The Project will consult with the communities and local authorities prior to finalizing the procedure.

The objectives of the procedure are:

- To have a process by which grievances from communities, groups, individuals, local authorities, NGOs and other local stakeholders can be processed efficiently, constructively, and in a timely and transparent manner. The goal is to resolve grievances amicably and minimize the use of the legal system.
- To manage social risks.
- To provide an accessible and socially acceptable process to enable communities and local stakeholders to express their grievances and concerns.
- To establish a transparent relationship based on mutual respect with the communities and other local stakeholders.
- To establish operational responsibility regarding grievances and establish a course of action to manage the grievances in a timely manner.

4.2 GRIEVANCE CHANNELS

Complainants are free to choose their method of raising a grievance; the following channels are in place for them to do so:

- Grievances can be submitted in English, French or Arabic.
- Contact any member of the project staff; the project representative will collect details of the complaint, and the complaint will be handed to the Samta Mining Community Department.
- Via email Samta.morocco@samta.net or contact listed on Samta website www.samtamines.com.
- Completion of the Samta Grievance form (see Appendix B), which will be available online and at the AFZ entrance, and can be submitted at the Samta grievance box located at the AFZ entrance, or posted/delivered to Samta's Moroccan Head office in Casablanca and addressed to the Community Department.
- File a grievance by phone.
- Raise the grievance or issue at a public meeting held by Samta.
- Through a community representative, such as village leaders, village committees, district offices, civil society, groups, associations or religious leaders.

4.3 OVERVIEW OF THE GRIEVANCE PROCEDURE

There are four steps outlined in the Grievance Procedure to resolved grievances:

1. **Registration of grievances:** Once the relevant information is collected from the grievant (via the grievance channels), the Community Relations Coordinator will enter the grievance into the Grievance Register and inform the Social Responsibility Manager.
2. **Investigation of the grievance:** The Community Engagement Officer will discuss with the claimant the issue and obtain maximum information from them. Investigations will include discussions with the Samta Mining department/Contractor concerned. The grievance will then be classified based on subject, using the Company's classification description, by department, and by severity, as per the Grievance register.
3. **Treatment of the grievance:** Grievances will be handled according to the outcome of the investigation (i.e. if the problem can be solved immediately; if the grievance is not justified; if the grievance is legitimate and requires financial or in-kind compensation; if the claimant is not satisfied with the proposed solution). The Grievance procedure outlines appropriate treatment in each case.
4. **Closure:** The Social Responsibility Manager will determine if the grievance has been closed to the satisfaction of the claimant. Once it has been closed, the information will be entered into the Grievance Register.

The following table outlines the timeframe required to resolve grievances.

TABLE 4-1 GRIEVANCE RESOLUTION TIMEFRAMES

Action	Delay
Samta employees and contractors to inform Community Relations Department	24 hours
Registration of grievance	24 hours
Investigation	Maximum 7 days after receiving the grievance
Resolution of grievance	Emergency situations – Immediate response. Unsafe conditions, nuisance or disturbance, employee behaviour, traffic, etc. – 1 to 2 days. Other issues – 30 days.

4.4 GRIEVANCE MONITORING AND REPORTING

Grievances will be submitted and recorded as follows:

- Monthly report
- Annual report
- Government quarterly report
- Grievance register
- Daily operations meetings
- ESHS internal meetings
- Reporting to lenders
- Reporting to team management meetings

The Grievance Procedure will be reviewed every 6 months after implementation to determine if changes need to be made. This will include a review of the Grievance Register, classification system, satisfaction of grievants, number of similar grievances, resolution time, and category of grievance.

4.5 ROLES AND RESPONSIBILITIES OF THE GRIEVANCE PROCEDURE

The table below outlines the various roles and responsibilities across the Samta Moroccan operations regarding the management of grievances as per the Grievance Procedure.

TABLE 4-2 ROLES AND RESPONSIBILITIES FOR GRIEVANCE MANAGEMENT (WIDER SAMTA MOROCCO OPERATION)

Role	Responsibility
Chief of Operations (COO)	Ensure adequate financial and human resources are available to properly manage grievances.
Project Manager	Develop controls for project team, contractors and suppliers to minimize the damage related to construction and operational activities likely to generate grievances from the community, and check performance of contractors.
Area Managers under COO	Implement controls and take measures to minimize potential causes of grievances by the project team, contractors and suppliers. Make sure that staff and contractors enforce the procedure. Provide solutions to resolve the grievance with the Community Relations Coordinator. Assign the responsible department the task of providing technical solutions to the grievance(s) together with the Community Relations Coordinator.
Community and Government Relations Manager	Review the Grievance Mechanism Procedure, in particular issues that might arise from local government. Report all grievances from local government. Consult and communicate the availability of the Grievance Mechanism Procedure with the province Governor. In cooperation with the Social Responsibility Manager, provide "solutions" to grievances raised by the Prefet and/or Governor. Support the Social Responsibility Manager with all community grievances that have been reported to the Prefet and/or Governor.
Manager (HSSE)	Providing guidance on best practices for solving grievances. Liaise with department heads to ensure grievances are well understood and contractors are informed about the procedure and proper way to manage grievances.
Social Responsibility Manager	Prepare the Grievance Procedure Mechanism and drive its implementation. Provide amendments to the grievance management system, if required, and provide solutions to manage risks and improve stakeholder engagement. Keep the COO, CEO and Manager-HSSE informed of the status of grievances rated 3-Moderate to 5-Catastrophic.
Community Relations Coordinator	Regularly review communication and management tools to identify potential risks and recurring events. Inform supervisors immediately upon receipt of a new grievance. Coordinate and oversee the management of the appropriate treatment in order to resolve the grievance. Find solutions in collaboration with other services involved and effectively follow the progress of the resolution of the grievance. Measure the severity of the grievance or the level of risk according to the Samta Mining definition. Establish rates for compensation in collaboration with other departments and stakeholders involved. Inform other Samta Mining services and contractors based on site, of the existence of this procedure. Liaise with the resettlement coordinator for all grievances related to resettlement. Keep the Camp Lead and Project Manager informed of progress regarding resolution of grievances.
Community Engagement Office	Oversee the implementation and monitoring of the treatment of grievances. Ensure that all project staff report all grievances. Ensure that all grievances received in writing receive a written response (Annex 3). Ensure that all grievances are registered in the management tool (Grievance Register). Ensure each grievance is followed up and a response is officially submitted.

Role	Responsibility
	to the claimant. Coordinate grievances in conjunction with the Community Relations Coordinator Ensure daily monitoring of the Grievance Register: updates, completeness and quality of data. Provide Social Responsibility Manager with the data needed for the preparation of monthly reports.
Community Liaison Officers	Inform the claimant and/or the members of the community about potential solutions. Report all grievances received to the Community Relations Coordinator. Inform communities of the existence and availability of the grievance procedure, particularly groups identified as vulnerable within these communities. Respond to grievances that are easy to resolve and inform the Community Relations Coordinator. Provide suggestions to improve management of the grievances, based on practical experience. Serve as a mediator between the stakeholders and the project. Develop and implement the Grievance Mechanism Procedure consultation tools and record all consultation meetings and comments in the Communication Register.
All Samta Staff	In the absence of a member of the Community Department, receive grievances from an individual or a community. If the grievance has been received verbally, record as much information as possible, including: the name and surname of the claimant, contact information and name of village, date and brief description of the grievance. Avoid making any recommendations or proposing solutions regarding the grievance to the claimant without the presence of a member of SM Community Relations Department. Communicate all grievances received
Contractors and Sub-contractors	When requested, provide support and solutions to address grievances, in particular those that have been caused by the contractors/sub-contractor. Communicate all grievances received.
Stakeholder Committees (as relevant)	Identify culturally appropriate grievance solutions in collaboration with SM and the claimants, mediate confrontation between parties when the claimant disputes the outcome of the treatment of the grievance, and in collaboration with SM determine when the Grievance needs to be taken to a higher level to be resolved.

5. ROLES & RESPONSIBILITIES

The Project will assign individual responsibilities to manage stakeholders, however, the overall accountability for stakeholder engagement lies with the CEO, who will be assisted by the Relationship Manager. The role of the Relationship Manager is to:

- Improve two-way information flow.
- Build trust,
- Nurture relationships and
- Provide a company focal point for each stakeholder.

6. MONITORING & REPORTING

6.1 KEY PERFORMANCE INDICATORS

Project stakeholder engagement data will be incorporated into Samta's wider Moroccan Operations indicators to track the effectiveness of stakeholder engagement.

TABLE 6-1 SAMTA'S MOROCCAN OPERATIONS STAKEHOLDER ENGAGEMENT KPIS

Key Performance Indicator	
Communication	Number of brochures disseminated
	Visual aids prepared
	Positive and negative media events
	Press releases
	Announcements in community boards
	Awareness campaigns
	Number of people attending awareness campaigns
Stakeholder Engagement	Number of consultations held with communities
	Number of men and women participating in the consultations/information sessions
	Information meetings with communities
	Number of recommendations made by stakeholders, recording of recommendations and whether they have been addressed by project
	Number of grievances
	Number of grievances resolved within specified delay
	Number and type of capacity building delivered to communities
	Update and implementation of stakeholder engagement programme

6.2 ENGAGEMENT RECORDS

The Project will maintain records of all engagements and comments received as follows:

Meeting Register: All meeting details (including date, participants, stakeholder category, type of meeting, issues discussed, and actions agreed) will be recorded in the Meeting Register. Minutes of meetings and lists of participants will also be prepared for important discussions.

Comments Register: All comments and grievances received from stakeholders along with associated resolutions will be maintained.

The Meeting Register and Comments Register will be reviewed periodically and the Stakeholder Matrix will be updated accordingly to ensure management alignment with evolving stakeholder interests, expectations and influence.

6.3 ACTION PLANS

Action plans (as per the template in Appendix C) will be developed to ensure that stakeholder concerns are managed and addressed. These action plans will be populated and maintained in alignment with the Stakeholder Matrix, Meeting register and Comments Register to ensure all stakeholder concerns are assigned to the relevant management process and ultimately addressed. Reference numbering can be utilized to link comments and outcomes between registers and action plans.

6.4 REPORTING TO LENDERS

E&S performance monitoring outcomes and Project updates will be reported to Lenders in line with Applicable Standards and specific Loan Agreements. In this regard, the Project will develop:

- E&S monitoring procedures and reporting templates;
- Communication protocols to cover construction and operational phase E&S monitoring and reporting; and
- Assessment updates and communications protocols around change management.

6.5 INCIDENTS

The Project will develop protocols to promptly notify relevant Moroccan Governmental Agencies and Project Lenders of any environmental or social incident or accident relating to Samta or the project, which has, or is likely to have, a significant adverse effect.

APPENDIX A MOROCCAN PUBLIC CONSULTATION
AND INFORMATION SHARING
REQUIREMENTS FOR IMPACT
ASSESSMENTS

NATIONAL PUBLIC INFORMATION AND CONSULTATION REQUIREMENTS

The requirements of Moroccan legislation on public information and consultation are mainly to be found in the regulations relating to impact assessment.

The requirements for consulting and informing the public in the context of environmental and social impact assessments are set out in Decree no. 2-04-564 of 5 Kaada 1429 (4 November 2008) "establishing the procedure for organising and conducting the public enquiry for projects subject to environmental and social impact assessments", drawn up under Law no. 12-03 on environmental impact assessments and promulgated by Dahir no. 01-03-60 of 10 Rabii I 1424 (12 May 2003).

The main provisions of this decree are as follows

- The request to open a public enquiry must be submitted by the petitioner, accompanied by a file containing the following documents in Arabic and French:
 - an information sheet highlighting the main technical characteristics of the project that is subject to the public enquiry;
 - a non-technical summary (NTS) of the preliminary draft impact assessment, i.e. a document that is clear and comprehensible to the public, in particular the main information and data contained in the EIA, especially those relating to the positive and negative impacts of the project on the environment and the measures envisaged to eliminate, reduce or compensate for the negative impacts of the project on the environment; and
 - a site plan showing the boundaries of the area where the project is expected to have an impact.
- The public enquiry is opened by order of the prefecture or governor of the province concerned within a period not exceeding ten (10) days from the date of the request.
- The conduct of the public enquiry is entrusted to a committee chaired by the local administrative authority of the place where the project is to be carried out and made up of:
 - the president(s) of the municipality or municipalities concerned or his/her representative;
 - the representative of the government authority responsible for the environment (Ministry of Energy, Mines and the Environment, MEME);
 - the representative of the government authorities responsible for the sector affected by the project at national or regional level, as appropriate; and
 - any person invited by the chairman to assist the committee in its work, including an expert, if deemed necessary, for certain aspects.
- The order to open a public enquiry must specify:
 - the nature of the project, its consistency and location;
 - the population affected by the public enquiry within the impact zone of the project subject to the EIA;
 - the opening and closing dates of the public enquiry;
 - the place(s) of consultation and the place(s) where public comments and proposals will be collected;
 - the names and positions of the chairman and members of the commission, who are responsible for carrying out the public enquiry.
- The order with the request to open the public enquiry is brought to the attention of the public at least fifteen days before the opening date by publication in at least two daily newspapers, one of which must be in Arabic, authorised to receive legal notices, and

posted in the premises of the municipalities concerned. This notice must be posted throughout the public enquiry. In addition, the Commission may use any other appropriate means of communication, including audiovisual means, to ensure that the necessary information on the public enquiry reaches the population.

- For the duration of the enquiry, the chairman of the commission must take all necessary steps to give the population concerned access to the consultation file, at least by making it available at the offices of the municipalities concerned.
- The chairman shall also make public a register in which to record comments and suggestions on the project.
- The public enquiry will last twenty (20) days. At the end of this period, the commission must draw up the public enquiry report on the basis of the observations recorded in the register and summarising the observations and proposals made by the population affected by the project.
- The public enquiry report and the register will be sent by the Chairman to the Chairman of the National Committee for Impact Studies (CNEI), or to the Chairman of the Regional Committee for the area affected, within eight (8) days of the closing date of the public enquiry.

To sum up, Moroccan law requires a 20-day public enquiry, during which the population, informed in advance by the Ministry's regional services through press publications, is invited to consult the social and environmental project documentation (including a non-technical summary) and to provide their observations in a register, which will then be taken into account in the commission's final report.

By making the summary of the EIA available, the public enquiry enables the population concerned to find out about the possible repercussions of the project on the environment and their mitigation measures, and to gather their comments and proposals.

Moroccan regulations do not specifically require public meetings, although they are not outlawed. In practice, most major projects not only provide the public with project documentation, but also organise information meetings and consultations as part of public enquiries.

MOROCCAN PUBLIC ENQUIRY PROCESS

The public enquiry (PI) process for projects subject to an environmental impact assessment is summarised in the diagram below:

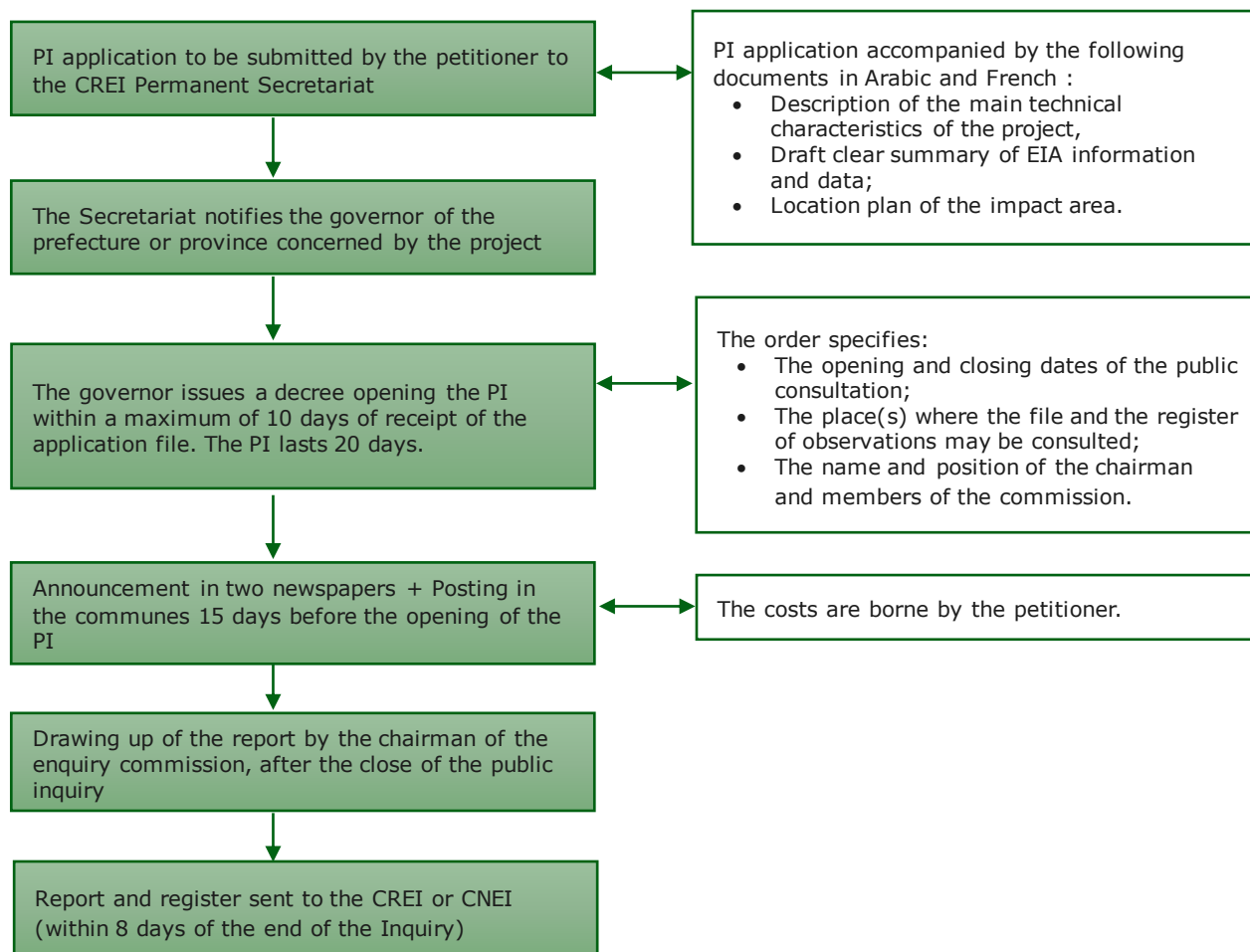


FIGURE A - 1 PROCESS OF THE PUBLIC ENQUIRY RELATING TO THE ENVIRONMENTAL IMPACT STUDY UNDER MOROCCAN LEGISLATION AND REGULATIONS

APPENDIX B SAMTA GRIEVANCE FORM

Grievance / Complaints Reporting Form

Date	
Name and contact details (leave blank if anonymous)	
Samta Operation / Area /Location	
Nature of Grievance / Complaint	

Grievance reporting mail ID: Samta.morocco@samta.net

APPENDIX C

STAKEHOLDER ENGAGEMENT ACTION
PLAN TEMPLATE

STAKEHOLDER ENGAGEMENT ACTION PLAN TEMPLATE

[illegible]