



Environmental & Social Management System

Social Management Plan

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1 INTRODUCTION

1.1 Purpose

This Social Management Plan (SMP) has been developed by Centerra Gold Mongolia (CGM) for the exclusive application at the Gatsuurt Gold Project site. This Management Plan is one of a series of Management Plans that outline how CGM through its subsidiary, Boroo Gold Company (BGC) manages the social aspects of its Gatsuurt operations. The purpose of this Management Plan is to:

- Define the scope of the Management Plan and set out applicable management interfaces;
- Define roles and responsibilities;
- Outline the applicable Project Standards relevant to this Management Plan;
- Define Project commitments, operational procedures and guidance relevant to this Management Plan;
- Define monitoring and reporting procedures, including Key Performance Indicators;
- Define training requirements; and
- Set out references for supporting materials and information.

1.2 Application

The requirements set out in this Management Plan apply to all Gatsuurt operations and personnel, including contractors. The requirements of this Plan are applicable for all aspects of the Project, including mining operations at Gatsuurt, ore haulage and processing at the Boroo Gold Mine.

This Management Plan is based on the BGC Health, Safety and Environment Management System (HSEMS), which is implemented for all CGM operations in Mongolia and will provide the framework for the management of health, safety, environment and social aspects of the Gatsuurt Project. Any subsequent changes to the BGC HSEMS may result in changes to this Management Plan.

1.3 Commencement

This Management Plan applies from the commencement of construction of the Gatsuurt Project.

1.4 Authority and Management

This Management Plan will be reviewed on a two-yearly basis to determine whether any changes or updates are required to the plan unless a more frequent update is required to reflect changing project design or procedures.

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

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2 SCOPE

2.1 Scope of this Management Plan

This Management Plan applies to all construction and operations at the Gatsuurt Mine, mine related transport and ore processing at Boroo Gold Mine including contractor activities.

2.2 Overlaps with other Management Plans

This Management Plan is part of the overall suite of Management Plans developed for the Gatsuurt Project and as described in the BGC HSEMS:

- Stakeholder Engagement Plan;
- Traffic Management Plan;
- Surface Water Management Plan;
- Acid Rock Drainage Management Plan;
- Biodiversity Management Plan;
- Gatsuurt Mine Closure Plan; and
- BGC Tailings Management Facility Manual;

3 ROLES AND RESPONSIBILITIES

3.1 Key Roles and Responsibilities for Management Plan Implementation

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

Table 1: Key Roles and Responsibilities

Role	Responsibilities
BGC General Manager	Ensuring Project compliance with the Project Standards and other requirements set out in this Plan. Approval of this Plan and resources required for implementation.
BGC Director External Relations	Overall responsibility for Plan scope and implementation. Development, monitoring and revision of this Plan.
Community Relations Manager Media Relations Manager Manager of Health and Safety Mine Manager Government Relations Manager Manager of Human Resources Manager of Supply Chain / Procurement	Timely implementation of this Plan, including coordination with various operational departments, implementing organisations and other stakeholders. Monitor and report on plan implementation. Ensure communication and awareness of the Plan requirements to supervisors, employees and contractors.
Community Relations Officers	Primary liaison with community leaders and members in a specified

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Role	Responsibilities
	<p>location.</p> <p>Coordinates logistics for information and consultation meetings in location.</p> <p>Maintains community diary to record community interactions about Company-related issues.</p> <p>Submits monthly report on community diaries and CR activity in impacted areas.</p> <p>Participates in Joint Working Group meetings.</p>
Contractors	<p>Ensuring all assets under their control comply with Centerra and BGC's policies and procedures.</p> <p>Supplying certification and/or license in accordance with statutory requirements.</p> <p>Complying with BGC's requirements for social management.</p> <p>Reporting of all actual and potential social impacts to relevant supervisor or managing body.</p>
Employees	<p>Minimise the impact of their activities on communities / social context wherever practical and reasonable.</p> <p>Complying with the obligations outlined in this Management Plan, as well as any other relevant Gatsuurt environmental and social policies and procedures.</p> <p>Reporting of all actual and potential social impacts to relevant supervisor or managing body.</p>

3.2 Key Interfaces

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

- General Manager Operations, particularly in relation to security management and the safe implementation of off-site activities;
- Manager Environment, in regards to the communication of environmental issues that may impact communities including discharges, emissions, hazardous materials and land management;
- Mine Manager for the overall management of the Gatsuurt Mine;
- Manager of Health and Safety for the effective implementation of health and safety controls both internally and externally;
- Manager Human Resources, particularly in relation to labour management and employment;
- Media Relations Manager, particularly in relation to the management of communications with stakeholders, key public messaging, media relations, among others;
- Manager of Supply Chain, in relation to management of supplies, and relationships with local suppliers;
- Manager of Government Relations, in relation to media communications, management of community relations and government relations staff, and contact with the State Government, aimag and soum officials.

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4 PROJECT STANDARDS

Applicable Standards must be complied with for all Project activities (the “Project Standards”).

4.1 Applicable Mongolian Legislation

Applicable Mongolian Legislation related to this HMMP include:

- Law on Environmental Impact Assessment (In force in 1998, amended 2001, 2006, and 2012);
- Environmental Protection Law (In force on 5 June 1995, amended 17 May 2012);
- Law on Subsoil (In force on 29 November 1988);
- Minerals Law (In force on June 26, 2006);
- Law on the Protection of the Cultural Heritage (In force 8 June 2001, amended in 2004);
- Labour Law of Mongolia (In force on 14 May 1999, amended 13 December 2012);
- Law on Sanitation (In force on 7 May 1998).

4.2 Applicable Mongolian National Standards

Applicable Mongolian National Standards (MNS) related to this SMP include:

- MNS 900:2005 Environment. The human health protection. Security. Drinking water. Hygienic requirements and quality control.
- MNS 4990:2000. Occupational Health and Safety. Workplace environment. Hygienic requirements.
- MNS 3473:1983 Environment. Land. Land use. Terminology and determination.

4.3 DEIA requirements

Mongolian Detailed Environmental Impact Assessments (DEIAs) have been undertaken for this Project and outline required environmental management and monitoring requirements. Commitments made in the following DEIAs are applicable to this MP:

- BIOX® Plant DEIA (Nature Friendly LLC, 2010);
- Gatsuurt Haul Road DEIA (Gazar Eco, 2006); and
- Gatsuurt Mining DEIA (Nature Friendly LLC, 2009) and Gatsuurt Mining DEIA Addendum (Eco Trade LLC, 2014);

4.4 Other Commitments to and Requirements of Mongolian Government Authorities

Mongolia has entered into a number of International agreements that include commitments to act or refrain from acting in the manner prescribed in the agreement. The government of Mongolia has promulgated specific laws implementing specific international agreements; it has also incorporated provisions in national laws indicating that where the national law is inconsistent with international agreements to which Mongolia is a signatory, the requirements of the international agreement will prevail. Accordingly, the terms of international agreements to which Mongolia is a party need to be understood. Set out below is a brief summary of international agreements applicable to social management for the Gatsuurt Project.

- Labour Relations and Workers' Rights:
 - Forced Labour Convention, 1930 (No. 29), ratified 15.03.2005;
 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), ratified.06.1969;
 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98), ratified 3.06.1969;

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- Equal Remuneration Convention, 1951 (No. 100), ratified 3.06.1969;
- Maternity Protection Convention (Revised), 1952 (No. 103), ratified 3.06.1969;
- Abolition of Forced Labour Convention, 1957 (No. 105), ratified 15.03.2005;
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111), ratified 3.06.1969;
- Employment Policy Convention, 1964 (No. 122), ratified, 24.11.1976;
- Minimum Age (Underground Work) Convention, 1965 (No. 123) Minimum age specified: 18 years, ratified 3.12.1981;
- Workers' Representatives Convention, 1971 (No. 135), ratified 8.10.1996;
- Minimum Age Convention, 1973 (No. 138) Minimum age specified: 15 years, ratified 16.12.2002;
- Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144), ratified 10.08.1998;
- Occupational Safety and Health Convention, 1981 (No. 155), ratified 3.02.1998; and
- Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159), ratified 3.02.1998.
- Livestock Production:
 - Agreement for the Establishment of a Regional Animal Production and Health Commission for Asia and the Pacific (Entry into force in Mongolia on 8 May 2007).
- Cultural Heritage:
 - Convention for the protection of cultural property during armed conflict (Ratified in 1964);
 - Convention on the prevention measures of illegal entry and release of cultural heritage, as well as prohibition of the cultural heritage ownership transfer (Ratified in 1991);
 - World Cultural and Natural Heritage Convention (Ratified in 1990);
 - Convention on the Protection of Intangible Cultural Heritage (Ratified in 2005);
 - Convention for the protection and promotion of the diversity of cultural expressions (Ratified in 2005).
- Regulations:
 - Regulation on Conducting Archaeological, Paleontological Exploration, Excavation and Survey in the Territory of Mongolia;
 - Regulation on Guideline for Waste Disposal and Landfill by Citizens and Economic Entities;
 - Regulation on Air Quality Data Reports;
 - General Regulation on Organising Internal Monitoring on Operations of Economic Entities and Organisation;
 - Regulation on Developing Environmental Management Plans, Quality Assurance and Reporting;
 - Regulation on the Extraction Operations of Minerals from Small-Scale Mines.

4.5 Applicable International Standards and Guidelines

The International Organization for Standardization has established a series of broadly accepted standards for the management of environment and occupational health and safety, of which Centerra aligns with the following:

- ISO14001:2004 Standard for Environmental Management Systems
- OHSAS 18001 Standard for occupational health and safety management systems

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The European Bank for Reconstruction & Development (EBRD):

In accordance with EBRD's 2014 Environmental and Social Policy, EBRD seeks to ensure, through its environmental and social appraisal and monitoring processes, that the projects it finances:

- Are socially and environmentally sustainable;
- Respect the rights of affected workers and communities; and
- Are designed and operated in compliance with applicable regulatory requirements and good international practice.

EBRD Environmental and Social Performance Requirements include:

- PR 1: Assessment and Management of Environmental and Social Impacts and Issues;
- PR 2: Labour and Working Conditions;
- PR 3: Resource Efficiency and Pollution Prevention and Control;
- PR 4: Health and Safety;
- PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement;
- PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- PR 7: Indigenous Peoples;
- PR 8: Cultural Heritage;
- PR 9: Financial Intermediaries; and
- PR 10: Information Disclosure and Stakeholder Engagement.

4.6 Applicable Centerra Policies

This Management Plan is developed within the Centerra corporate policies that include policies for the protection of worker health and safety, environmental protection and sustainable development.

4.7 Boroo Gold Procedures

All CGM operations are implemented under the requirements of the BGC HSEMS in place at Boroo Gold Mine.

4.8 Other Industry Guidelines with which Gatsuurt has Committed to Comply

Other industry guidelines with which Centerra has committed to align, include:

- Extractives Industry Transparency Initiative (EITI) (Centerra is a signatory);
- Global Reporting Initiative (GRI), applying the G3 Index and the Mining and Metals Supplement;
- Voluntary Principles on Security and Human Rights;
- World Gold Council's Conflict-Free Gold Standard; and
- International Cyanide Management Code (as a gold miner and a cyanide consignor/transporter), (Centerra is currently a signatory and will seek ongoing certification).

5 MITIGATION MEASURES AND MANAGEMENT CONTROLS

5.1 Summary

This document outlines Gatsuurt's commitment and approach to mitigating social risks that may arise as a direct or indirect result of the Gatsuurt project.

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The intent of this Management Plan is to ensure sound social management for the Gatsuurt Project. This is achieved through the implementation of the management controls designed to minimise the risks and maximise the benefits associated with the social context of the Project, in accordance with Mongolian and relevant international standards.

Table 2 below presents the key management controls that Gatsuurt will operate to.

5.2 Plan Goals and Objectives

The overall objective of social management is, in the case of negative impacts, to avoid or, when avoidance is not feasible, minimise social impacts. In the case of beneficial impacts, the objective is to maximise these. These objectives will be achieved by:

- Establishment of social management priorities based on risk;
- Avoid or minimise negative social impacts;
- Maximise beneficial social impacts;
- Implementation of engineering controls, where practicable;
- Implementation of management controls to address remaining residual risk.
- Ensure appropriate risk based emergency management procedures are in place in the event of an incident.

These objectives will be pursued through implementation of this Management Plan, and will be measured and evaluated through the key performance indicators detailed in Section 7.2 below.

5.3 Key Stakeholders

Key external stakeholders of relevance to this management plan include (see Stakeholder Engagement Plan for detailed description):

Stakeholder	Area of interest/interaction
Government of Mongolia	Permitting, approvals, and monitoring of the Project.
Non-Governmental Organisations (NGOs) and Community-Based Organisations (CBOs)	Community Development, Corporate Social Responsibility; Issue-specific interests
Institutes and Academia	Compliance, Reporting
Impacted Communities	Groups of people directly and indirectly affected by the Project.

5.4 Management Controls

Based upon the identified impacts and opportunities in the Social Impact Assessment, the control measures detailed in Table 2 below will be put in place during construction, operations and mine closure phases of Gatsuurt Project.

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Table 2 Key Management Controls

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
SMP01	Economic	All	As agreed in CDA, develop a Community Development Management Plan to guide implementation of the Social Development Fund	Manager of Environment- Manager of Government Relations; Community Relations Manager; CROs	<ul style="list-style-type: none"> • Internal audit and inspection programme.
SMP02	Economy		<ul style="list-style-type: none"> • Conduct stakeholder engagement to design specific programming within the Community Development Agreement initiatives to focus on identifying targeted options for local economic development; these can be piloted during the operational phase of the Project, and scale up / increase as the mine moves into closure phase, including: <ul style="list-style-type: none"> ○ Develop a partnership with a professional body to manage the microfinance program under the CDA (a microfinance program was successfully developed at the Boroo Gold Project). ○ Distribute donations under the CDA according to a program of target areas at scheduled times in the financial year. ○ Introduce a grant program component and phase out donations under the CDA and ○ Prioritise CDA investment into human capital (rather than capital expenditure and infrastructure) for more sustainable outcomes. 	Community Relations Manager CROs	<ul style="list-style-type: none"> • SEP; • Community / stakeholder feedback (Grievance Mechanism); • Internal audit and inspection programme.

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
SMP03	Economy	All	<p>Implement community development activities under a "Cooperation Agreement (i.e. the CDA)" with the aimag and Project Area soums in compliance with the following:</p> <ul style="list-style-type: none"> Activities funded under the CDA are to be included in the aimag and community development plan; Determination of the investment program is to be based on the principles of sustainable development; and The investment program is aimed at improving the livelihoods of citizens and promoting SMEs and family businesses. 	<p>Community Relations Manager</p> <p>CROs</p>	<ul style="list-style-type: none"> Internal audit and inspection programme; Community / stakeholder feedback (Grievance Mechanism); Ongoing social baseline monitoring.
SMP04	Economy	All	<p>Implement a Local Procurement Policy and management plan to guide management of local suppliers, as agreed in CDA, including:</p> <ul style="list-style-type: none"> Procurement from a mix of project-affected soums/baghs to minimise local inflation effects. BGC specification and requirements are made clear on consistent quality, volumes, quantities and other specifications, and ensuring supplier contracts are clear in specifying such requirements and expected standards for delivery of goods and services; Prequalification survey implementation to screen for potential local suppliers; and Provide targeted SME Supplier training and development through a Supplier Development Program, to ensure local sourcing and procurement opportunities can be met through local suppliers. A minimum requirement for operation as a local business / service delivery in the local area is required - in much the same way that local employees will need to satisfy criteria for demonstrating a period of local residency - to qualify as a 'local supplier'. 	<p>Manager of Procurement and Supply Chain</p> <p>Manager of Human Resources</p> <p>Community Relations Manager</p> <p>CROs</p>	<ul style="list-style-type: none"> Local Procurement Policy; Local Procurement Management Plan; Supplier contracts records; Prequalification survey records; Supplier training records in Training Register; Training Management Plan.

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
SMP05	Economy	All	Support capacity building initiatives which build the ability of governments to effectively and transparently manage increased tax revenues and increased demands for social and public services, especially in support of vulnerable groups at the local level, and including through CGM's ongoing role as an EITI Supporting Company, through GRI reporting and in promoting Mongolia as an investment destination, at the national and international level.	Community Relations Manager; Manager of Government Relations; Media Manager.	<ul style="list-style-type: none"> • EITI Reporting; • GRI Reporting; • Media / Communications Records; • SEP.
SMP06	Labour and Working Conditions	All	<ul style="list-style-type: none"> • Coordinate with TVET schools on relevant training requirements such that the Mongolian workforce is able to uphold international workplace safety standards; and • As agreed in CDA, engage with soum Government departments to encourage applications from and ensure potentially suitable job seekers. 	Manager of Human Resources	<ul style="list-style-type: none"> • Meeting minutes with TVETs; • Formal memorandum of understanding with TVET; • Meeting minutes with Government.
SMP07	Labour and Working Conditions		<ul style="list-style-type: none"> • Provide vacancy notices that have clear position requirements; • Advertise vacancies in local community Labour Offices and on the CGM website; 	Manager of Human Resources	<ul style="list-style-type: none"> • Vacancy advertisements records.
SMP08	Labour and Working Conditions	All	Provide ongoing training for the Community Relations team, to facilitate their capacity to engage, visit communities and talk to those stakeholders potentially impacted by the Project, particularly on employment opportunities, requirements, application timing and assessment processes.	Manager of Human Resources Manager Community Relations	<ul style="list-style-type: none"> • Training and Competence Register. • Employment and Training Management Plan.
SMP09	Economy	Closure	<ul style="list-style-type: none"> • Research employers who CGM anticipated may be hiring, and identify the types of roles and in what numbers and communicate this to the workforce going through retrenchment; • Support the soum administrations in looking at alternate sources of employment / business development 	Manager of Human Resources	<ul style="list-style-type: none"> • Alternative employment opportunities communications memo; • Engagement records with soum administration on

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			opportunities; <ul style="list-style-type: none"> • Deliver collective redundancy requirements as provided for in the Collective Agreement; 		alternate sources of employment at mine closure; <ul style="list-style-type: none"> • Collective redundancy agreement implementation records.
SMP10	Labour and Working Conditions	All	Facilitate work readiness through training for potential employees.	Manager of Human Resources	<ul style="list-style-type: none"> • Training and Competence Register. • Employment and Training Management Plan.
SMP11	Labour and Working Conditions	All	Clearly delineate tasks and responsibilities for maintaining stakeholder relationships and on workforce requirements and timeframes.	Manager of Human Resources	<ul style="list-style-type: none"> • Employment and Training MP.
SMP12	Labour and Working Conditions	All	Provide ongoing training for the existing Mongolian labour force at Boroo.	Manager of Human Resources	<ul style="list-style-type: none"> • Training and Competence Register. • Employment and Training Management Plan.
SMP13	Labour and Working Conditions	All	Consider current / former Boroo staff in supervisory roles (as appropriate), including for training of new employees.	Manager of Human Resources	<ul style="list-style-type: none"> • Training and Competence Register. • Employment and Training Management Plan.
SMP14	Labour and Working Conditions	All	Retrain the existing processing workforce to be able to operate new equipment (in particular, the BIOX® plant); and	Manager of Human Resources	<ul style="list-style-type: none"> • Training and Competence Register. • Employment and Training Management Plan.

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
SMP15	Labour and Working Conditions	All	Use an expatriate workforce for a term-limited period.	Manager of Human Resources	<ul style="list-style-type: none"> • Employment and Training Management Plan. • Employment records.
SMP16	Labour and Working Conditions	All	<p>Ensure all employment contracts are in place, monitored and enforced, including of indirect employees for consistency and equity across the Project;</p> <p>Ensure employee complaint mechanism is in place.</p>	Manager of Supply Chain / Procurement	<ul style="list-style-type: none"> • Employment contracts records; • Internal audit and inspection programme; • Employee complaint mechanism and register of recorded complaints.
SMP17	Labour and Working Conditions	All	Implement the standard BGC employment contract template for Gatsuurt employees for consistency in approach within the CGM workforce, assuming Gatsuurt employees will also be part of the existing BGC union.	Manager of Human Resources	<ul style="list-style-type: none"> • Employment Contract records.
SMP18	Labour and Working Conditions	All	<p>Require compliance with, at minimum, the Labour Code, for all contractor workforces, including that a Collective Agreement must be in place with a number of provisions that go beyond compliance with the Labour Code;</p> <p>Employee Standards Review will be undertaken on a regular basis to ensure compliance with EBRD PR 2 requirements and labour code by all contractors.</p>	<p>Manager of Human Resources</p> <p>Manager of Supply Chain / Procurement</p>	<ul style="list-style-type: none"> • Internal audit and inspection programme; • Collective Agreement records.
SMP19	Labour and Working Conditions	All	Develop a Contractor Management Plan as the mechanism for ensuring contract compliance, in any instance where contractors are not unionised.	<p>Manager of Human Resources</p> <p>Manager of Supply</p>	<ul style="list-style-type: none"> • Contractor Management Plan

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
				Chain / Procurement	
SMP20	Labour and Working Conditions	All	Retain salary levels that are competitive in the employment market and consistent with existing BGC salaries, to minimise effects of inflation.	Manager of Human Resources	<ul style="list-style-type: none"> Ongoing social baseline monitoring reporting.
SMP21	Demography	All	Monitor demographic changes, in particular, any negative impacts of in-migration or relations between or within the workforce and the community, with the soum governments to enable tracking and appropriate response development where required.	Community Relations Manager	<ul style="list-style-type: none"> Ongoing social baseline monitoring reporting.
SMP22	Demography	All	Maintain the camp standards at construction camps to mitigate potential negative effects of this short term workforce, including: <ul style="list-style-type: none"> Requirement for contractor workforce to comply with the CGM requirements to work on site and at Contractor camps. Requirement for contractor compliance with the Boroo Drug and Alcohol Policy and CGM safety requirements. Requirement for contractors to match the preference for local labour hire as per CGM. 	Manager of Supply Chain / Procurement Manager of Human Resources Community Relations Manager Manager of Environment	<ul style="list-style-type: none"> Internal audit and inspection programme; Contractor Management Plan.
SMP23	Demography	All	<ul style="list-style-type: none"> Liaison by the Project with Government will include issues of law enforcement requirements to address increased Project-induced in-migrants; CGM will also work with the police and relevant Government agencies if required, to address any Project-induced antisocial behaviour. 	Community Relations Manager; Manager of Government Relations;	<ul style="list-style-type: none"> Meeting Minutes; Ongoing social baseline monitoring and reporting.
SMP24	Land Use and Livelihoods	All	Application of dust suppressant on the road to minimise dust generation during all phases of the Project. Additional	Manager of Environment;	<ul style="list-style-type: none"> Atmospheric Emissions Management Plan;

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
			measures include: <ul style="list-style-type: none"> • Additional periodic road grading. • Covering loads of trucks to prevent both release of dust off trucks and ore from falling off trucks. • Communications on volume and timing of haul truck movements as described in the Stakeholder Engagement Plan. • Maintain an improved gravel surface for the duration of construction, operations and closure. Mitigation of the impacts of dust generation from the TSF lifts will include: <ul style="list-style-type: none"> • Scheduling construction activity as far as practicable with agreeable weather conditions; localised dust suppression as required; • Minimise the movement of the volumes of construction materials; • Stakeholder notification and grievance mechanism in place. 	Community Relations Manager CROs Mine Manager	<ul style="list-style-type: none"> • SEP (Grievance Records); • Ongoing baseline monitoring and reporting. • Stakeholder notification records.
SMP25	Land Use and Livelihoods	All	<ul style="list-style-type: none"> • As agreed in CDA, include pasture / cropping improvement measures within activities funded through the CDA, to: <ul style="list-style-type: none"> ○ Support herders / farmers to improve herd / crop management and animal / crop health issues leading to improved livelihoods; ○ Promote herder / farmer joint collaboration initiatives to generate and diversify income; and ○ Preserve the pasture and livestock sector and nomadic culture. 	Manager of Environment Community Relations Manager CROs Logistics Manager.	<ul style="list-style-type: none"> • CDA Records; • Ongoing baseline monitoring and reporting;
SMP26	Demography	All	<ul style="list-style-type: none"> • Regular policing of the Gatsuurt area by CGM's existing security force as per existing operations and eviction of any illegal loggers that are encountered. 	Manager of Security; Community Relations Manager	<ul style="list-style-type: none"> • Security / Incident Records.

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SMP27	Demography	All	<p>Minimise landscape impacts by:</p> <ul style="list-style-type: none"> Limiting areas of vegetation clearance to the areas required to accommodate the Project, and Maintaining screening of the area as far as practicable through the narrow valley at the eastern end of the Gatsuurt site. <p>Land disturbance from borrow pits will be mitigated through using existing sites thereby minimising creation of new areas of disturbance. Borrow sites will be reclaimed after completion of materials extraction. The existing processes for land clearance and grassland rehabilitation will be applied, as has been successfully demonstrated through the Boroo project.</p>	Manager of Environment	<ul style="list-style-type: none"> SEP (Grievance Records); Land Clearance and Grassland Rehabilitation Procedure. Ongoing baseline monitoring and reporting.
SMP28	Demography		<p>Tree planting activities that protect high value forest areas to offset vegetation clearance, has the additional positive benefit of creation of seasonal jobs and revenue generation for local communities. Enhancement of this benefit is achieved through providing jobs for those communities directly impacted by the clearance, for example, as was applied in replanting of offset trees from Tunkhel by Tunkhel citizens.</p>	Manager of Environment Community Relations Manager CROs	<ul style="list-style-type: none"> Biodiversity Management Plan; Employment and Training Management Plan; Community Development Management Plan; Ongoing baseline monitoring and reporting.
SMP29	Demography	All	<p>Mitigation of the potential impacts of artisanal mining¹ post-closure include:</p> <ul style="list-style-type: none"> Development of a Mine Closure Plan, including social closure actions, through the Local cooperation council and in consultation with all relevant stakeholders (including artisanal miners), which will be updated from a conceptual to a detailed plan through the operations phase of the Project prior to detailed implementation at 	Manager of Environment Community Relations Manager CROs	<ul style="list-style-type: none"> Mine Closure Plan; Social Closure Working Group (meeting minutes); Engagement Records (SEP).

¹ Management measures specifically associated with Trespass and Illegal Mining (TIM) are included below. TIM has been addressed as a separate issue, given its manifestation at the Gatsuurt Project in late 2015.

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			closure. <ul style="list-style-type: none"> • Promote ownership of the closure plan by formalised artisanal miners through engagement with miners and other stakeholders to design closure landforms that match, or are sympathetic to, the pre-artisanal mining landscape. 		
SMP30	Demography	All	Closure impact mitigation measures include: <ul style="list-style-type: none"> • Re-vegetation and tree nursery project activity to be undertaken by local residents of the Project Area (see above in Demography section). • Enhancement of the positive economic benefits as a result of closure, see above Economy section. 	Manager of Environment Community Relations Manager CROs	<ul style="list-style-type: none"> • Closure Management Plan.
SMP31	Social Infrastructure	All	Actions to mitigate and enhance impacts to education include: <ul style="list-style-type: none"> • Update the Training Plan to reflect current Gatsuurt specific requirements such as the detailed human resource requirements and timing for the life of the Project. • Engage with TVET institutions (Mandal, Darkhan, Erdenet) for sourcing the pipeline of existing construction and mining skills talent, and for provision of work-readiness training to high potential construction and operations staff, prioritising those from the Project Area, for construction, operations and closure phases. • Design and implement a scholarship programme to encourage the study of subjects of relevance to the Project needs, targeting high potential graduates from the Project Area, weighted to Tunkhel bagh, for implementation in construction, operations and closure phases. • Review the BGC recruitment policy to ensure 	Manager of Human Resources; Manager of Supply Chain and Procurement Community Relations Manager CROs	<ul style="list-style-type: none"> • Training and Employment Management Plan; • Internal audit and inspection programme; • Scholarship Programme Implementation Records. • Recruitment Policy; • Engagement Records (SEP).

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			<p>consistency the Labour Code, Mongolian law and good industry practices.</p> <ul style="list-style-type: none"> • Map the training plan and skill needs of the Project with skill gaps in the Project Area to enable design of appropriate responses to improve opportunities for prioritization of recruitment of the local workforce by the Project. This will include monitoring mechanisms with targets for employment of people from the Project Area, including of women. • Engage with schools, TVET providers and universities to support industry learning through the operations phase. • Conduct ongoing implementation and review of the Training Plan to ensure that Project needs are met and align with policy for prioritisation of local employment and targets set at the construction phase. • Monitor effectiveness of workforce training delivery (in-house and third party) and implement any corrective actions as necessary. 		
SMP32	Health, Safety and Security	All	<p>Mitigation of impacts to health services from the Project include:</p> <ul style="list-style-type: none"> • Ensure that all CGM employees and contractors are provided with adequate health care for work-related issues and injuries that is independent of the local health care system; • Mitigate the potential pressure on health services resulting from in-migration through liaising with local health professionals to identify ways that the Project can provide sustainable, non-capital investments in the health services; and 	<p>Community Relations Manager</p> <p>CROs</p> <p>Manager of Procurement / Supply Chain</p> <p>Manager of Government Relations</p> <p>Manager of Health and Safety</p>	<ul style="list-style-type: none"> • Employee Health Care Provider Records; • Engagement records (SEP); •

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SMP33	Health, Safety and Security	All	<p>Mitigation of impacts to safety include:</p> <ul style="list-style-type: none"> Provision of induction, training and supervision in the first months of employment, for both staff and contractors. Implementation of training procedures and verification of competency to become familiar with the site and its hazards, as well as the hazards within the task and site's method to complete the task. Conduct risk assessments for new tasks, systems of work and plant. Contractor management requirement of a minimum level of OHS to be met through the contract duration, with action/penalties in response to any breaches. Implementation of prequalification / screening processes prior to contracting. Contract Performance monitoring including of inductions, daily safety toolbox meetings, monthly contractor management meetings on safety. MSDS in place for new materials, training for staff, including retraining and new training for BIOX® facility, with SOPs to be developed for the BIOX® facility. Emergency response plan in place, with ongoing training should it need to be implemented. 	<p>Manager of Health and Safety Community Relations Manager</p> <p>CROs</p> <p>Manager of Procurement / Supply Chain</p> <p>Manager of Government Relations</p>	<ul style="list-style-type: none"> Training Register; Training Procedures; Internal audit and inspection programme; Records of risk assessments conducted; Contractor OHS breach records; Contractor pre-qualification / screening records; Contractor Performance Monitoring Records, including inductions, toolbox meetings, management meeting records; MSDS Records; Emergency Response Plan.
SMP34	Health, Safety and Security		<p>To mitigate the risk of severe injury and death from emergency events such as industrial process and equipment accidents and explosions, CGM will implement the existing relevant measures from Boroo to Gatsuurt, including:</p> <ul style="list-style-type: none"> Review the Crisis Management Plan and Emergency Response Plan, already in place by CGM, for relevance to the Gatsuurt context. Disclose the Emergency Management Plan (EMP). Undertake engagement with emergency response 	<p>Mine Manager</p> <p>Manager of Health and Safety Community Relations Manager</p> <p>CROs</p> <p>Manager of Procurement / Supply</p>	<ul style="list-style-type: none"> Crisis Management Plan and Emergency Response Plan. Disclosure records / minutes; Engagement records on emergency response with relevant organisations; ICMC audit records.

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			<p>organisations on emergency response issues.</p> <ul style="list-style-type: none"> • Continue application of the International Cyanide Management Code (ICMC) for the manufacture, transport and use of cyanide to ensure good international industry standards are applied and maintained in how the company procures, transports, stores, uses, disposes of cyanide. 	<p>Chain Manager of Government Relations</p>	
SMP35	Health, Safety and Security	All	<p>To mitigate the potential threat to human health and life from gaining unauthorised access to any part of the Project site, during construction, operation and closure, the existing relevant mitigation measures from Boroo to Gatsuurt will need to be implemented:</p> <ul style="list-style-type: none"> • Exclusion of public from active mining areas to minimise impacts of blasting; • Use of security personnel to ensure no unauthorised public access; • Signage at all entrance/exist points and periodically on boundaries/fenced areas; • Regular stakeholder engagement program to notify of key safety issues on, around and offsite; and • Outreach program to periodically bring visitors for site visits in a controlled and safe manner. 	<p>Manager of Health and Safety Mine Manager Community Relations Manager CROs</p>	<ul style="list-style-type: none"> • Internal audit and inspection programme; • Stakeholder Engagement Records (SEP) on safety awareness; • Site visit records.
SMP36	Health, Safety and Security	All	<p>To mitigate the potential introduction and spread of communicable diseases related with construction and operation, the following mitigation measures will need to be implemented:</p> <ul style="list-style-type: none"> • Ensure health screening is being conducted for employees and contractors before contracting workers and on a periodic basis throughout their employment/contract; • As part of health and safety induction for workers, provide awareness training on STIs and other communicable disease prevention. Provide this training 	<p>Manager of Health and Safety Manager of Human Resources Community Relations Manager CROs</p>	<ul style="list-style-type: none"> • Health screening records; • Induction records; • Employee dismissal records.

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			<p>on an ongoing basis;</p> <ul style="list-style-type: none"> Work in collaboration with the onsite Project medical team to ensure that such awareness and education training is appropriately provided to both direct employees and contractors; and Identify opportunities to support local public health campaigns that focus on prevention of communicable diseases and STIs; and Strict enforcement of a policy of no prostitution around worker camps.. 		
SMP37	Health, Safety and Security	All	<p>To mitigate the potential safety and security related impacts from the Project, the following mitigation measures will need to be implemented:</p> <ul style="list-style-type: none"> Ensure that Project security is aware of the Project's goals to establish good relationships with local stakeholders; and the grievance mechanism for communities to voice concerns; additionally, ensure that security personnel receive and remain up to date on human rights and cultural sensitivity training to ensure the respect and protection of the local community and that security personnel are monitored. Implement and provide training in the Code of Conduct specific to security personnel, which outlines appropriate conduct, engagement and appropriate use of force, and audits of the application of the Voluntary Principles. Continue stakeholder engagement efforts to ensure that all potentially affected stakeholders know how to contact the company and to file grievances (in accordance with the Grievance Procedure). Provide workforce accommodation on site to minimise interactions with local communities while working (including the construction, operations and closure workforce). 	<p>Manager of Health and Safety</p> <p>Community Relations Manager</p> <p>CROs</p> <p>Manager of Human Resources</p> <p>Manager of Supply Chain / Procurement</p>	<ul style="list-style-type: none"> Training Register; Employment and Training Management Plan; Code of Conduct; Stakeholder Engagement records / Grievances Register; Camp Rules. Security personnel monitored.

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			<ul style="list-style-type: none"> Minimising the potential for speculative job-seekers/ economic opportunity seekers (as per Demography) thereby limiting potential for conflict with residents. Implement the Camp rules for employees and contractors mitigating interactions offsite with communities and training to ensure respectful and appropriate behaviours are understood and practiced at all times. Implementation of security staffing practices as per arrangements that have been in place at Boroo. 		
SMP38	Cultural Heritage	All	<p>CGM has put in place the measures to mitigate potential effects to archaeological heritage including:</p> <ul style="list-style-type: none"> Provision of accommodation for the workforce at Boroo to limit accessibility by employees and contractors to heritage resources. Interference with cultural heritage sites by employees and contractors is prohibited by the employee and contractor Code of Conduct. Minimisation of published detail about known heritage resources to prevent theft or damage to sites, unless based on the advice of cultural heritage experts. Implement the Chance Find procedure as the key policy that requires anyone working on the mine, to stop work and investigate any archaeological find they come across by chance, including cessation of work in the vicinity of potential significant finds and notification of relevant authorities. Consult with the Mongolian Academy of Sciences Institute of Archaeology prior to any disturbance of any known tangible cultural heritage sites. 	<p>Manager of Environment;</p> <p>Community Relations Manager;</p> <p>Manager of Human Resources;</p> <p>CROs;</p> <p>Media Relations Manager</p>	<ul style="list-style-type: none"> Employee Code of Conduct; Chance Finds Procedure; Internal audit and inspection programme.
SMP39	Cultural Heritage		<p>Measures to be implemented by the Project to mitigate potential effects to intangible heritage include:</p> <ul style="list-style-type: none"> Implementation of an induction program which includes 	<p>Manager of Environment;</p>	<ul style="list-style-type: none"> Induction records; Procurement records; SEP and Grievance

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			<p>cultural awareness training for all employees and contractors, developed with input from native expert citizens, to decrease likelihood of damage and disrespect to local heritage practices and sites.</p> <ul style="list-style-type: none"> • Avoid sourcing construction materials from locally sacred sites. • Ensure that the public's access to cultural heritage sites continues to be unimpeded by the Project's use of the Gatsuurt haul road throughout the Project life. • A stakeholder engagement and grievance process will be implemented to direct ongoing engagement with local stakeholders. The stakeholder engagement and grievance process will have a particular focus on those practicing herding traditions, and the Project's impacts and the mitigation measures to minimise any effects to the pasture and water resources that are a critical part of herding practice, and an ongoing and responsive program on pasture improvement (see also Land Use). • Furthermore, the Project will work with the soum governments and community groups to support local cultural events and conserve and reinforce local traditions and culture. • Should monitoring determine that ICH is being impacted, or community members express a concern in the future that it is being adversely affected; mitigation measures should be employed to minimise these effects. Potential mitigation measures include providing support to local institutions to be able to meet the information and educational needs of communities with respect to cultural heritage in response to evidence of the lack of local expertise in cultural heritage. CGM may also establish an oral-history program to be based in the soum cultural centre to enhance oral traditions in the 	<p>Community Relations Manager; CROs; Media Relations Manager</p>	<p>Mechanism and engagement and grievance records;</p> <ul style="list-style-type: none"> • Records of support to local cultural events; • Internal audit and inspection programme. • Ongoing baseline monitoring and reporting.

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			Project Area and also, prepare exhibits and public programs that inform local residents about intangible and tangible cultural heritage.		
SMP40	Artisanal and Small-scale Mining	All	<p>Develop a Strategic Action Plan with key partners and other Mongolian stakeholders (to be determined) including:</p> <ul style="list-style-type: none"> • Information Gathering & Analysis: <ul style="list-style-type: none"> ○ Conduct and update the social/security risk assessment; ○ Further identify and understand the core drivers and associated societal impacts of TIM activity; ○ Assess existing punitive measure options through liaison with the police and judiciary; and ○ Establish information gathering network protocols with key stakeholders. • Communication & Awareness Raising: <ul style="list-style-type: none"> ○ Develop and deliver a community-focused educational program to discourage intrusions and TIM activity; ○ Continue internal educational and awareness programs for all BGC employees regarding the risks of colluding with, or being involved with Trespass and Illegal Mining (TIM) related activity; ○ Work with soum leadership and police to implement an awareness campaign targeted to promote the respect for the rule of law and community policing concepts; ○ Check and reinforce community awareness on the BGC grievance mechanism and ensure that the Community Relations Department is fully aware of what constitutes an allegation of a human rights abuse and how to report it internally. • Government & Civil Society Engagement: <ul style="list-style-type: none"> ○ Engage with the Mongolian Government through various levels to campaign and seek 	<p>Manager of Security Community Relations Manager; CROs; Media Relations Manager Manager of Health and Safety Mine Manager Manager of Government Relations</p>	<ul style="list-style-type: none"> • Regularly updated social risk assessment. • Records of engagement and correspondence with key stakeholders. • Education program delivery records. • Grievance mechanism records. • Engagement records with Government and other

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
			<p>warning system and to gather potential evidence for prosecution;</p> <ul style="list-style-type: none"> ○ Ensure a Perimeter Protection Plan is implemented to strengthen the demarcations of the licensed area clearly and visibly using fencing, other barriers and appropriate signage (establishing concentric circles of control and buffer zones). ● Security Response: <ul style="list-style-type: none"> ○ Ensure that appropriate resources are available for personnel to effectively respond to possible threats including manpower, supervision, equipment – PPE, communications, and non-lethal options, etc.; ○ Ensure that appropriate training and levels of competency have been attained for personnel to effectively respond to possible threats including legal use of force, equipment use, field level risk assessment etc.; ○ Define what is considered a significant security incident and ensure it is reported internally (and externally to the Police) and dealt with accordingly (and also review the Emergency Response Plan in accordance with such incidents).; ○ Ensure the continuation of embedding international human rights principles, specifically those enshrined in the VPSHR, in all security related processes and actions; ○ Ensure human rights training is provided for all BGC personnel including Government security forces deployed for intervention. 		<p>Protection Plan.</p> <ul style="list-style-type: none"> ● Training records; ● Internal reporting records of security incidents. ● Record of regular reviews of Emergency Response Plan. ● Regular audits against VPSHR.

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6 IMPLEMENTATION SCHEDULE

6.1 Review and Revision of this Management Plan

This Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs of Gatsuurt. Revision of this Management Plan will be the responsibility of the Manager Environment, who is custodian of this Plan.

If material changes to operating procedures are required (as identified through the Management of Change procedure contained within the HSEMS), this Management Plan may be updated on an “as required” basis.

7 MONITORING

7.1 Overview of Monitoring Requirements

The Monitoring measures that are to be implemented during the operations phase to assess compliance with Project Standards (see *Section 4: Project Standards*) are described in the section.

In the event that monitoring identified non-conformance with Project Standards, these will be investigated and appropriate corrective actions identified.

7.2 Key Performance Indicators

The table below summarises the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

Table 3: Key Performance Indicators and Monitoring Actions

ID	KPI	Target	Monitoring Measure
HM-KPI 01	Number of reported non-compliances with the mitigation controls identified in this Management Plan.	Target: Zero Minimise and continued improvement in number of reported non-compliances	Internal audit results
HM-KPI 02	Time taken to respond to community grievances	Target: Acknowledge receipt of grievance within 3 working days; provide documented response to grievance within 14 working days.	Grievance reporting records and responses
HM-KPI 03	Awareness of community relations personnel on the requirements of this Plan	Target: 90 % of community relations personnel provided with awareness training on the requirements of and implementation of the social impacts management plan	Training records.

8 TRAINING

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All employees of CGM and selected Contractors for the Gatsuurt Project are required to complete training on aspects related to social management (see above in Table 2).

Records of all training completed shall be maintained.

9 AUDIT AND REPORTING

9.1 Internal Auditing

Operational area supervisors will carry out regular internal audits and inspections in relation to social management.

All incidents and non-conformances identified during these inspections are reported as per the requirements of the BGC HSEMS.

9.2 External Auditing

Conformance with this plan will be subject to periodic assessment as part of the BGC HSEMS audit programme and by Project Lenders.

9.3 Record Keeping

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