

FEDOROVO

RESOURCES

Fedorova Tundra Project

Environmental and Social Impact Assessment

Stakeholder Engagement Plan

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LIST OF ABBREVIATIONS

EBRD	European Bank for Reconstruction and Development
ESIA	Environmental and Social Impact Assessment
IFC	International Finance Corporation
IFIs	International Finance Institutions
IP	Contact Water Pond
MIPN	Minor Indigenous People of the North
EIA	Environmental Impact Assessment
PAP	Potentially Affected Parties
SR	Scoping (Preliminary Environmental and Social Assessment) Report
PS (IFC)	IFC Performance Standard
RF	Russian Federation
SEP	Stakeholder Engagement Plan
SER	State Environmental Review
SME	Small and Medium-Sized Enterprises
FS	Feasibility Study
ToR	Terms of Reference
ICP	Informed Consultation and Participation
FPIC	Free Prior Informed Consent
GOK	Mine and Beneficiation Plant
BAT	Best Available Technique

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1. INTRODUCTION

The Fedorova Tundra deposit, located in the Lovozero District, Murmansk Region (Figure 1), is one of the world's largest platinum and palladium fields in the world.



Figure 1. Map of the Project Area

In 2001, the Barrick Gold Company (Canada) established the Fedorovo Resources CJSC which owns the license to explore, mine and process ores from the Fedorova Tundra deposit. The Project was suspended in 2009 for economic reasons.

The process was resumed in late 2020 by the Russian consortium comprising both private and public enterprises². Fedorovo Holding LLC, acting as the Client, owns the Fedorovo Resources Company (Operating Company), which has extended the mining license until 2034. Currently, the Operating Company is conducting additional geological exploration in the Fedorova Tundra field and finalising the Mining Feasibility Study including reserve estimation.

The Operating Company is firmly committed to environmental and social accountability and strictly follows RF legislative requirements. The company is also striving to implement the project in a manner that is consistent with good international practice. The International Finance Corporation (IFC) requirements and Equator Principles (EPs)* form the core of the guiding framework for the Project; other relevant standards, guidelines, approaches and recommendations adopted by various international finance institutions (IFIs, ICMM) are applied as required.

¹ The map has been developed by Ecoline based on information provided by the Fedorovo Resources JSC and Golder Associates Company.

² The Project structure is described in more detail in the Fedorova Tundra Project Scoping Report and subsequent documents.

* Detailed information on the Equator Principles (EPs) is provided herein on page 15.

The development of the bankable FS and ESIA compliant with IFC requirements has now commenced, with the preparation of design documentation as required by the RF legislation to start shortly. The OVOS (national EIA) process (including public consultation) would be undertaken as required once the design documentation has been prepared. The details of the OVOS process are discussed separately. Ore mining and concentrate processing at the Fedorova Tundra site are planned to start in 2027.

Ecoline Environmental Assessment Centre has been appointed to conduct the ESIA (as per international lender's requirements) and national environmental impact assessment (OVOS) for the Project.

This Stakeholder Engagement Plan (the Plan or SEP) has been developed in compliance with IFC PS1 and describes the approach to and programme of stakeholder engagement activities aligned with RF legislation and IFI standards (Figure 2). This Plan is a living document that will be updated as new information becomes available through consultation, survey and design. Public consultation required as part of the OVOS and ESIA processes would be combined as much as possible. However, considering timing differences between the bankable FS and national design processes, there would be a limited space for doing so.

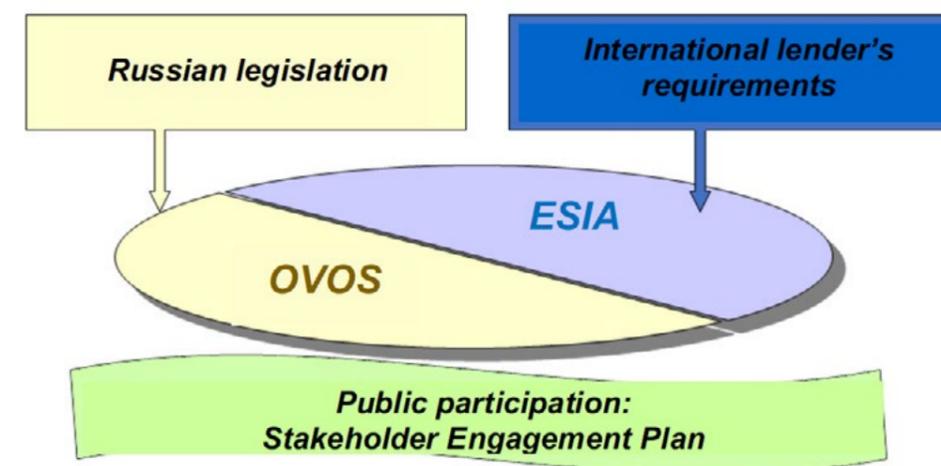


Figure 2. Impact Assessment and Public Participation

2. PROJECT OVERVIEW

The proposed mine is planned as two open pits and the processing plant would be capable of processing 8–16 million tonnes of ore per year. The proposed Fedorova Tundra Project site is planned to be located in the south-western part of the Tsaga River Basin, to the east of the water divide extending between the Kitsa and Pana River Basins (Figure 3).

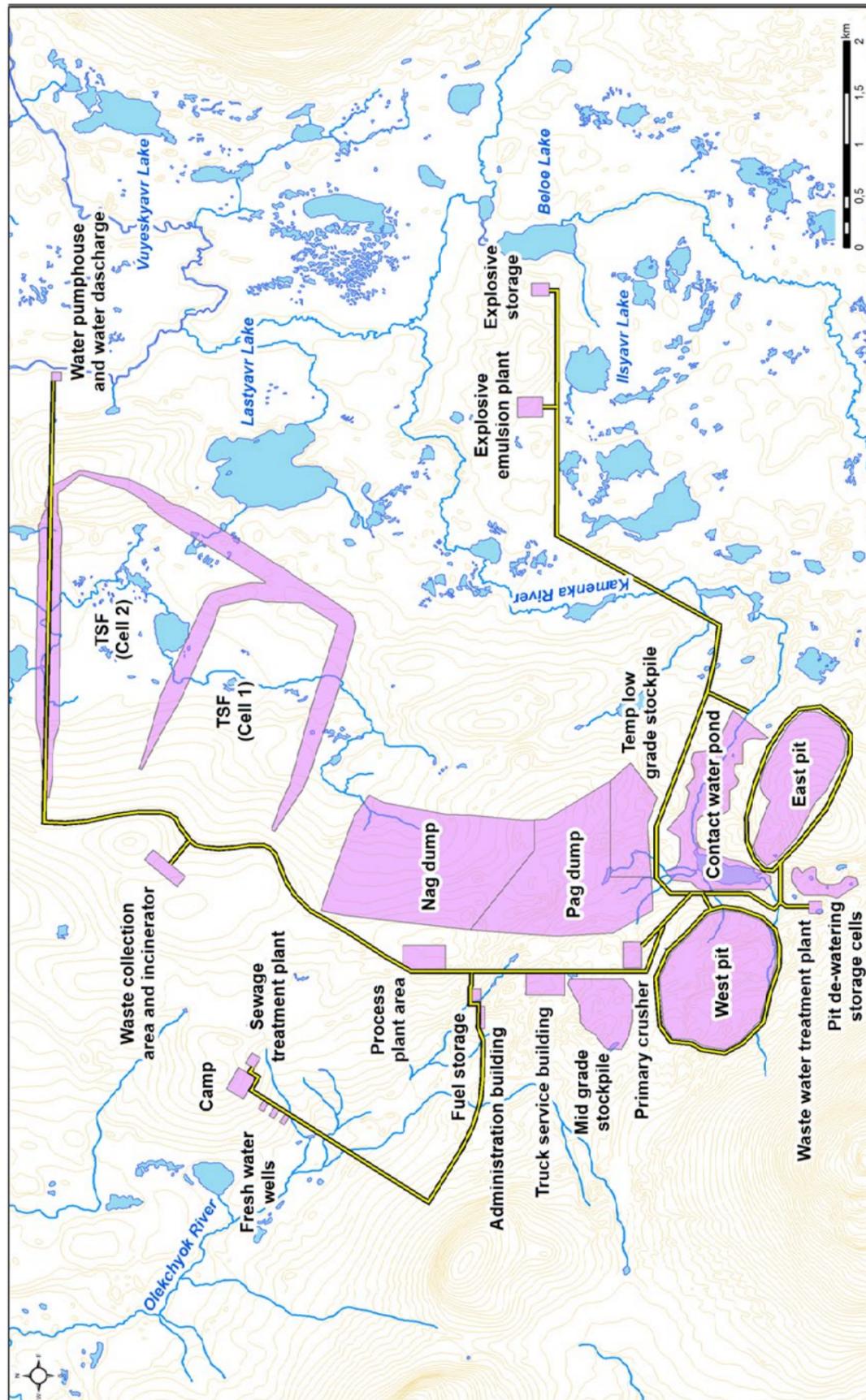


Figure 3. Preliminary Layout of Project Facilities³

³ Developed by Fedorovo Resources JSC

Key Project facilities are planned for the upper reaches of the Kamenka and Olekchyok Rivers, left-bank tributaries of the Tsaga River. The Project site is estimated to occupy 2,250 ha of land (including standby land).

According to the mine development schedule, pre-mining and stripping works would start two years before the commissioning of the processing plant. The mine would reach its design capacity three years after the commencement of mining operations and maintain that for the next 18 years. The preliminary mine development plan is presented below in Table 1.

Owing to its multiplying effect, the Project is expected to create about 50004 new jobs in the region, including about 1200 positions for well-paid, skilled personnel to work directly at the mine site.

Table 1. Preliminary Mine Development Plan (to be updated as part of design process)⁴

Year	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Total
Run-of-mine ore, million t	12	23.8	32.1	30.7	35.1	34.7	32.9	36.6	35.4	34.7	59.9	70	71.9	74.9	71.5	45.9	44.4	44	21.7	6.8	820
Ore, million t	0	5.9	7.2	8.1	8.2	8.1	8.3	8.3	8.1	8	14	15.9	16.4	16.9	16.5	16.2	16.1	16.2	16.1	5	220
Overburden, million t	12	17.9	24.9	22.6	26.8	26.6	24.6	28.3	27.3	26.6	45.9	54.1	55.6	58	55	29.7	28.3	27.7	5.7	1.7	600

2.1. Beneficiation Plant⁵

The beneficiation plant would have a capacity of 8 thousand tonnes of ore per annum (first stage) and 16 thousand tonnes of ore per annum thereafter (second stage). The plant would use staged flotation processes to produce concentrate (100-120 thousand tonnes per year (first stage) and 200-250 tonnes per year (second stage). The hourly ore throughput would be 993 t/hour (first stage) and 1995 t/hour (second stage).

2.2. Tailings Storage Facilities

The beneficiation plant is planned to have a closed-loop water supply system. Before being supplied to the beneficiation plant, reclaim water would be treated at the tailings storage facility to remove suspended solids.

After thickening, flotation tailings would be pumped to the tailings storage facility occupying 770 ha and planned for west of the Lastyavr Lake within the valley of the left-bank tributary of the Tsaga River. To contain seepage, the TSF base and dam wall would be covered with a polymeric membrane liner. Tailings would be transported to the tailings storage facility via an above-ground tailings pipeline designed as a gravity-fed system.

A water recirculation system consisting of pump stations at the TSF site and water pipelines is designed as a closed-loop system preventing the release of contaminated process water to the environment. Reclaim water would be pumped from the tailings storage facility to the beneficiation plant via a pipeline running parallel to the tailings pipeline. If there is a disruption to the tailings and water pipelines, process water from the beneficiation plant would be driven by gravity to the tailings storage facility.

⁴ Provided by the Fedorovo Resources JSC

⁵ Preliminary EIA



Figure 4. Photo Illustrating the Development of a Tailings Storage Facility with a Lining System ⁶

The water balance for the beneficiation plant assumes that pit water and surface runoff from the industrial site would be also accumulated at the tailings storage facility, which would also be designed to contain water from the water reservoir if necessary. With the proposed water recirculation system, the tailings storage facility would be a zero-discharge TSF having a capacity of 256 million tonnes.

Overburden Dumps

Overburden dumps would occupy 428 ha and would be located 200 m south-east of the Vostochny (Eastern) Pit. Runoff from the dumps would be captured and diverted to the pit water pond using interception drains established around the site.

2.3. Transport Infrastructure, Communications, Resources and Labour Required

Vehicles and equipment with diesel-electric and diesel transmission are planned to be used at the Project site. An oil leakage control system would be developed and implemented to prevent oil from penetrating the soil.

It is assumed that office premises, housekeeping facilities and employee amenities at the Project site would use raw water at 110 thousand m³/a. The proposed closed-loop water supply system would ensure zero discharge to the environment and water bodies. Prior to reuse, domestic wastewater would be treated biologically. A sludge treatment system would be provided for the activated sludge accumulated at the Project site.

Dedicated treatment facilities are planned for pit water and surface runoff; these treatment facilities would be designed taking local hydrogeology, orography and geomorphology into account.

⁶ Photo credit: <https://geosvit.com.ua/>

An engineered waste landfill would be provided at the site for solid industrial and domestic waste disposal. Other resources and materials required at the Project site include energy resources, water, ore, floatation agents, mechanisms and spare parts, fuels and lubricants, explosives and others.

Personnel

Employment would be on a fly-in/fly out system. Personnel would be sourced mainly from the Murmansk Region (Apatity, Kirovsk, Monchegorsk, Murmansk, Olenegorsk etc.). Employees would be brought to/from the Project site from/to the assembly point in Apatity by road (bus). The Company is actively exploring opportunities for cooperating with educational institutions across the Murmansk Region that could train workers and technical specialists for the Project.

Transportation of Employees and Goods

A Category V earth road of about 50 km would be designed and built to connect the Project site with the former Oktyabrsky settlement, to go around the settlement. The transportation of employees and goods from Apatity to Oktyabrsky would use the existing concrete road that is currently in operation.

Transportation of Goods and Export of Finished Product

A transfer terminal (warehouse) with a single-ended rail line is planned for Apatity. Goods required for the Project would be transported by railroad to the transfer terminal in Apatity and then delivered to the Project site by road extending for 42 km from Apatity to Oktyabrsky and for further 50 km from Oktyabrsky to the Project site. Some goods could be brought by sea to Murmansk, transported by road to Apatity and then delivered to the Project site. Finished product is planned to be transported in 2-tonne tote supersacks by road to Apatity where it would be transferred to rail cars and shipped out to customers.

During construction, large items (oversized goods) including equipment, mining machinery and metal structures would be shipped to the Murmansk seaport, then transported to the Titan station by railroad and further to the Fedorova Tundra (FT) site by road. Sizeable goods are not planned to be transported to/from the FT site on a regular basis during operations.

3. APPLICABLE REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

3.1. Russian Legislation

3.1.1. Environmental Impact Assessment and Public Consultation Process

In the RF, public consultation on the proposed projects forms an integral part of the national environmental impact assessment (EIA/OVOS) process. Public consultation is organised and facilitated by the Project proponent jointly with the relevant local authorities.

According to the EIA Regulations, the national environmental impact assessment procedure is conducted in three phases, including public consultation:

- Notification, preliminary assessment and compilation of OVOS ToR;
- Environmental impact assessment per se and preparation of the draft OVOS Report;
- Finalisation of the OVOS Report.

Stakeholder consultation should be conducted at each stage of the process. The EIA Regulations are flexible with respect to the form of the public consultation; consultation activities are planned for each of the three stages depending on the Project and developmental stage, potential environmental impacts and public interest.

New Requirements were added to the Environmental Impact Assessment Materials in December 2020⁷ to come into effect on 1 September 2021. The new requirements would apply to all projects submitted to State Environmental Review (SER) from that date onwards.

The new requirements for public consultation leave the decision on whether the OVOS ToR should be discussed with stakeholders to the discretion of the Operating Company. Depending on the epidemiological situation, they also allow stakeholder engagement to be moved online.

That said, face-to-face meetings are an important component of engagement as they help build trust and cooperation among stakeholders. Such face-to-face meetings (roundtables, focus groups, public hearings etc.) would be therefore used wherever the epidemiological situation allows.

According to the new requirements, OVOS materials for mineral resource projects should include, among other things, the analysis of proposed technology solutions against the requirements of the best available technologies (BATs), justification of process standards, actions on ensuring the interests of local (indigenous) communities, measures on protecting subsoil resources during drilling, sealing, operation and closure, and many other things. New OVOS scope and content requirements will be presented in more detail in the OVOS and ESIA Reports.

3.1.2. Minor Indigenous People

The Russian Federation has a well-defined body of legislation concerning indigenous minorities of the North, Siberia and Far East⁸. The legislation includes a number of bylaws and regional acts that are in place where indigenous minorities are concentrated.

The Federal Law No. 82-FZ “On the Guaranteed Rights of Indigenous Minorities in the Russian Federation” defines indigenous minorities¹⁰ as those native to a specific region where their ancestors have lived and maintain a traditional lifestyle, economic practices and crafts, have a total number of less than 50 thousand people and identify themselves as a distinct ethnic community (Clause 1, Article 1).

⁷ RF Ministry of Environment Order of 01.12.2020 No. 999 “On the Approval of the Requirements to the Environmental Impact Assessment Materials” (registered with the RF Ministry of Justice on 20.04.2021 No. 63186).

⁸ Federal Law of 30.04.1999 No. 82-FZ (as amended on 26.07.2019) “On the Guaranteed Rights of Minor Indigenous People in the Russian Federation”.

⁹ Federal Law No. 104-FZ (as amended on 27.06.2018) “On the General Principles Underpinning the Organisation of Small-Numbered Indigenous Communities of the Peoples of the North, Siberia and the Far East of the Russian Federation”.

¹⁰ Federal Law of 30.04.1999 No. 82-FZ (as amended on 26.07.2019) “On the Guaranteed Rights of Minor Indigenous People in the Russian Federation”. Article 1.

The Accountability Standard for the Residents of the Russian Arctic Region Governing the Engagement with Indigenous Minorities of the Russian Federation was adopted in 2020¹¹. It requires the residents of the Russian Arctic region to be guided by the following principles in their engagement with the indigenous minorities of the North:

1. Support the sustainable development of indigenous minorities, improvement of their living standards and preservation of their native habitats;
2. Ensure the participation of indigenous minorities in decision making on issues affecting their rights and interests when implementing natural resource management projects in their traditional lands;
3. Cooperation on improving socio-economic situation in the areas where indigenous minorities have traditionally lived and maintained their resource use practices in the course of conducting business by a resident of the Russian Arctic region;
4. Business activities conducted by a resident of the Russian Arctic region should be transparent for indigenous minorities and their organisations, government agencies and local authorities when it comes to any environmental and socio-economic issues affecting the interests of indigenous minorities;
5. Minimise any adverse impact resulting from business activities conducted by a resident of the Russian Arctic region in a manner that takes account of social, environmental and natural vulnerability of indigenous minorities and the Russian Arctic region in general.

3.2. International Lender’s Requirements

IFC requirements have been used as a benchmark for assessing environmental and social impacts associated with the implementation of the Fedorova Tundra Project.

The International Finance Corporation (IFC) is an agency financing private sector projects in transitional economies in an environmentally and socially sustainable manner. IFC’s Sustainability Framework includes a Policy on Environmental and Social Sustainability, Performance Standards and Access to Information Policy.

3.2.1. Information Disclosure and Public Consultation

IFC’s information disclosure requirements to investment projects are articulated in:

- IFC’s Access to Information Policy that defines general principles and approach to information disclosure (IFC, 2012);
- Performance Standard (PS) 1 “Assessment and Management of Environmental and Social Risks and Impacts”, outlining principles and approach to information disclosure and stakeholder engagement that should be maintained by IFC clients on their projects (IFC, 2012).

¹¹ RF Ministry for the Development of the Russian Far East and Arctic of 23 November 2020 No. 181 “On the Approval of the Accountability Standard for the Residents of the Russian Arctic Region Governing the Engagement with Minor Indigenous People of the Russian Federation, Living or Maintaining their Traditional Economy in the Russian Arctic Region”. 19 February 2021.

The Operating Company engages stakeholders in order to build and maintain constructive relationships with, first of all, communities affected by the Project and exposed to risks associated with the Project implementation. IFC has established the following key principles underpinning the stakeholder engagement process:

- thorough identification of all stakeholders, their expectations and concerns with regard to the Project;
- early disclosure of information and feedback mechanisms, designed to ensure all stakeholders have real access to information and are able to provide comments;
- engagement with all stakeholders (i.e. ensuring that the process is inclusive, not exclusive); special focus is concentrated on the parties affected by the Project's environmental aspects and vulnerable groups.

Stakeholder consultation forms an integral part of the project preparation and implementation process. Consultation serves to communicate information to stakeholders and receive feedback on their expectations, preferences and concerns, and ultimately ensure that the views and thoughts of the public are considered in decision making.

To be effective, stakeholder consultation should:

- be based on prior disclosure of relevant and adequate information including design documentation, plans and programmes;
- begin early in the ESIA process and continue throughout the Project life;
- focus on the Project's risks and adverse environmental and social impacts as they arise and on proposed mitigation measures designed to prevent, minimise, abate or offset these risks and impacts.

Similar to other IFIs, the approach adopted by the IFC includes consistent analysis of stakeholders, their expectations and concerns, their ability to exert influence on the Project and opportunities for cooperation. There is a special focus on those people who could be affected by the Project and vulnerable groups whose wellbeing could deteriorate as a result of the Project. Appropriate consultation methods for these groups should be carefully selected and specific impact prevention and mitigation measures, adjusted to take account the interests of vulnerable groups.

It is important to note that stakeholder consultation is not limited to any specific Project stage such as design development and ESIA; regular consultation continues throughout the Project lifecycle. IFC recommends developing and maintaining a Stakeholder Engagement Plan (SEP) scaled to the Project risks and impacts and development stage, and tailored to the characteristics and interests of stakeholders. As per IFC requirements, this document should include the following information:

- Stakeholder identification including vulnerable groups and analysis of their interests and concerns;
- Measures to develop constructive dialogue and cooperation with stakeholders; appropriate communication and feedback channels that meet national law, respect local culture and traditions, and are tailored to the preferences of local communities;
- Description of consultation processes, feedback collection tools and methods used to communicate ESIA findings to stakeholders;
- A stakeholder grievance redress mechanism.

IFIs recommend explore and using alternative information disclosure and stakeholder engagement methods during the COVID-19 pandemic. More specifically, the use of project websites as much as possible to publish information, prepare and disseminate brochures, use mailing list management solutions to disseminate information by e-mail and messengers (e.g., WhatsApp), use social media to publish information and receive feedback (vk.ru), disseminate information using mass media and information boards is encouraged. The following stakeholder engagement tools are recommended to be used in these circumstances: online or telephone surveys and polls, engagement through social media, through employees living in the Project area, and through TV and radio programmes.

3.2.2. Indigenous People

IFC PS7 "Indigenous People" uses the term "indigenous people" in generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees:

- self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture;
- a distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

Performance Standard 7 recognizes that Indigenous Peoples, as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalized and vulnerable segments of the population. Private sector projects can create opportunities for the participation of Indigenous Peoples, and benefits from project-related activities.

When dealing with Indigenous People, the stakeholder engagement process outlined in PS1 should be adjusted to meet the requirements specified in PS7, including, inter alia:

- Involving indigenous Peoples' representative bodies and organizations, as well as members of the affected communities of indigenous peoples;
- Providing sufficient time for indigenous peoples' decision-making processes.

If a proposed project is expected to affect indigenous communities, the Operating Company should take all steps required to minimise adverse impacts and develop an Indigenous Peoples Plan which also could form part of a broader Community Development Plan.

One of the key objectives articulated in PS7 is organizing and facilitating a more effective informed consultation and participation (ICP) process for indigenous people as a way toward achieving free, prior and informed consent (FPIC) of indigenous peoples which is required in the following circumstances:

- Impacts on land and natural resources subject to traditional ownership or under customary use;
- Relocation of indigenous peoples from land and natural resources subject to traditional ownership or under customary use;
- Critical cultural heritage¹².

3.3. Equator Principles

The Equator Principles (EP) is a framework document of good international practice for managing risks associated with large infrastructure and industrial projects. The EP document includes 10 risk management principles aligned with the IFC Performance Standards. In short, EP are intended to provide a minimum standard for environmental and social accountability that should be met to ensure responsible risk decision making.

The EP are dynamic and updated on an ongoing basis. The current (4th) version came into effect in July 2020¹³. Fedorovo Resources JSC has declared its commitment to EP. As of May 2021, some 118 Financial Institutions (FIs) from 37 countries have officially adopted the EPs.

The Equator Principles are listed below along with summary information about each of the 10 principles¹⁴:

- **Principle 1: Review and Categorisation** – based on the magnitude of potential impact, projects proposed for financing are categorised by EPFI into categories A, B and C.
 - **Category A** – Projects with potential significant adverse environmental and social risks and/or impacts that are diverse, irreversible or unprecedented;
 - **Category B** – Projects with potential limited adverse environmental and social risks and/or impacts that are few in number, generally site-specific, largely reversible and easily addressed through mitigation measures;
 - **Category C** – Projects with minimal or no adverse environmental and social risks and/or impacts.
- **Principle 2: Environmental and Social Assessment** – the EPFI require the client to conduct an appropriate assessment process to address and manage the relevant environmental and social risks and scale of impacts of the proposed project.
- **Principle 3: Applicable Environmental and Social Standards** – applicable IFC policies, performance standards and guidelines are recommended to be followed on all matters not covered in the EP framework.

¹² Critical cultural heritage consists of one or both of the following types of cultural heritage: (i) the internationally recognized heritage of communities who use, or have used within living memory the cultural heritage for long-standing cultural purposes; or (ii) legally protected cultural heritage areas, including those proposed by host governments for such designation. – PS8 “Cultural Heritage”.

¹³ <https://equator-principles.com/wp-content/uploads/2020/01/The-Equator-Principles-July-2020.pdf>
The 4th version of the document is now available only in English. However, the 3rd version (2013) is also available in Russian: https://equator-principles.com/wp-content/uploads/2018/01/equator_principles_russian_2013.pdf

¹⁴ EP would be considered in more detail in the ESIA Report that would be disclosed for public consultation.

- **Principle 4: Environmental and Social Management System and Action Plan** – develop and maintain an environmental and social management system (ESMS) and environmental and social action plan (ESAP).
- **Principle 5: Stakeholder Engagement** – for projects financed by EPFI, the client is required to demonstrate effective stakeholder engagement as an ongoing process in a structured and culturally appropriate manner with all stakeholder groups.
- **Principle 6: Grievance Mechanism** – for all Category A and, as appropriate, Category B projects, the client is required to establish effective grievance mechanisms designed for use by affected parties and workers.
- **Principle 7: Independent Review** – for all Category A and, as appropriate, Category B projects, an independent environmental and social consultant will carry out an independent review of the assessment process including ESMS and ESAP to determine compliance with the Equator Principles.
- **Principle 8: Covenants** – an important strength of EP is the incorporation of covenants linked to compliance. For all aspects where the project is not in compliance with the environmental and social covenants, the EPFI will work with the client on remedial actions to bring the project back to compliance.
- **Principle 9: Independent Monitoring and Reporting** – over the life of the Project, EPFI will require independent monitoring and reporting on the Project compliance with the environmental and social covenants.
- **Principle 10: Reporting and Transparency** – The following client reporting requirements apply to:
 - Category A and B projects: a summary of the ESIA Report including a summary of climate change and human rights risks and impacts;
 - Projects emitting over 100 thousand tonnes of greenhouse gases (GHG) – an annual public report on GHG emission levels;
 - EPFI encourage the client to share commercially non-sensitive Project-specific biodiversity data with the Global Biodiversity Information Facility (GBIF.org) and relevant national and global data repositories.

3.4. Good International Industry Practice

IFC's good practice publications are considered as a source of Good International Industry Practice (GIIP) approaches. The publications provide additional guidance for achieving good standards of stakeholder engagement (i.e., IFC's Good Practice Handbook on stakeholder engagement¹⁵) and management of grievances (i.e., EBRD's Grievance Mechanism Guidance Note¹⁶ and IFC's Good Practice Note on Addressing Grievances from Project-Affected Communities¹⁷).

4. GENERAL APPROACH TO STAKEHOLDER ENGAGEMENT

Fedorovo Resources JSC builds relationships with stakeholders in line with the RF legislation, IFI's requirements and best international practice.

4.1. Environmental Assessment Process and Stakeholder Engagement

The Project development and environmental and social assessment processes are aligned with the Russian legislation and IFI requirements. Both processes (national and international) are closely linked and use the same information (background data, surveys, modelling, etc.).

Due to the specifics of national and international project planning cycles and procedural requirements applied to them, two separate sets of design and environmental and social assessment documents are required for obtaining approvals/permits from the national authorities and IFIs.

To ensure compliance with Russian legislation and regulations, the Operating Company is currently developing key technical solutions that would provide a basis for preparing design documentation to be submitted to the State Environmental Review and State Review at the next stage of the project development cycle.

4.2. Stakeholder Engagement Experience

The Project has a long history and some experience with stakeholder engagement. Back in 2007 and 2008, Barrick Gold (Canada) initiated and held meetings with stakeholders to discuss issues raised by the latter on the envisaged project. A Stakeholder Engagement Plan was produced with implementation starting in 2008. The suspension of the project brought SEP implementation to a halt as well.

¹⁵ IFC. Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets. Available at: http://www.ifc.org/wps/wcm/connect/938f1a0048855805beacfe6a6515bb18/IFC_StakeholderEngagement.pdf?MOD=AJPERES

¹⁶ EBRD. 2012. Grievance Mechanism Guidance Note. Available at: <https://www.ebrd.com/downloads/about/sustainability/grievance-mechanism.pdf>

¹⁷ IFC. 2009. Good Practice Note. Addressing Grievances from Project-Affected Communities. Guidance for projects and companies on designing grievance mechanisms. Available at: <https://www.ifc.org/wps/wcm/connect/cbe7b18048855348ae6cfe6a6515bb18/IFC%2BGrievance%2BMechanisms.pdf?MOD=AJPERES&CACHEID=cbe7b18048855348ae6cfe6a6515bb18>

Project development has now resumed on the initiative of the Russian investors. Fedorovo Resources JSC keeps the public informed about the Project through mass media, corporate website and direct engagement with non-governmental organisations, public agencies and local authorities.

In order to meet international lender requirements, Fedorovo Resources JSC plans to take the following steps¹⁸:

- Complete the national environmental impact assessment of the Project (OVOS).
- Complete the environmental and social impact assessment (ESIA) as required by the International Finance Corporation (IFC) and World Bank.
- Establish a community engagement mechanism aligned with good international practice and underpinned by the Accountability Standard for the Russian Arctic region residents.
- Participate in important community development projects and ensure that local communities are involved in their implementation.

Fedorovo Resources JSC is committed to implementing the Fedorova Tundra Project in a manner that demonstrates a high level of social accountability. To this end, the Company is considering the following measures¹⁹:

- Provide focused training and subsequent employment to local youth to perform jobs required for the Project.
- Implement a programme of assistance to educational institutions.
- Support important public events and volunteer initiatives in the Lovozero District.
- Implement corporate social accountability programmes in the municipalities involved in the Project (Lovozero District, Apatity town, and Kirovsk town).

4.3. Approach to Stakeholder Engagement Planning

Stakeholder engagement planning is based on good international practice and includes:

- Stakeholder identification and analysis.
- Stakeholder engagement/consultation programme.
- Grievance mechanism.
- Monitoring and reporting.

The Stakeholder Engagement Rules are presented in Annex 2.

¹⁸ <https://fedorovoresources.com/>

¹⁹ <https://fedorovoresources.com/>

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholders are those social groups whose interests may be affected by the Project, who can affect the Project or who are interested in discussing the Project's environmental and/or social aspects. Stakeholder identification and analysis is one of the key elements of the engagement planning.

5.1. Stakeholder Identification

Ensuring a systematic stakeholder identification and analysis is required by IFIs and many international standards. Stakeholder identification is a process based on regular consultations and ongoing analysis of stakeholder engagement outcomes.

For the purposes of analysis, Project stakeholders have been grouped into the following key categories:

- Internal stakeholders including companies involved in the Project, their executives, personnel and shareholders, as well as contractors and subcontractors engaged in the Project and benefitting from it (investors, shareholders etc.); and
- External stakeholders including organisations and individuals not involved in the Project (as employees of the Operating Company, contractors and subcontractors), authorities that are involved (or would be involved) in the Project approval process; local communities affected by the Project, and interested public.

The present SEP focuses on the Company's engagement with external stakeholders which are identified using the following criteria:

- Impact: the Project could significantly affect certain community groups (potentially affected parties or PAPs).
- Influence: certain stakeholder groups could exert significant influence on the Project implementation process (influential stakeholder parties or ISPs).
- Partnership: opportunities exist for building partner relationships between the Company and certain community groups (potential partners or PPs).
- Interest: certain groups or individuals showing interest in the Project or interested in discussing its social and/or environmental aspects.

The initial list of stakeholders is presented in Annex 1 and would be amended and updated in the course of consultations.

5.2. Stakeholder Analysis

Based on publicly available information and consultation held in 2007–2008, a summary analysis of stakeholders, their interests, expectations and concerns was conducted to inform the stakeholder engagement planning process. For stakeholder classification, potentially affected parties and influential stakeholders were identified as those that require additional attention. Additional consultations are planned to be held to ensure a better understanding of the Project's

social consequences and identification of appropriate mitigation/enhancement measures; these consultations would be used to verify information on stakeholder expectations and concerns in respect of the Project.

All other stakeholders who might be interested in consultations/discussions on the environmental and social aspects of the Fedorova Tundra Project (interested stakeholders) have been invited to take part in the public consultation process and would have a full access to all consultation resources/meetings. More information about stakeholders interests and concerns will be gathered through consultation/engagement process. Based on this information, the SEP will be reviewed/amended/updated. The community development plan will be developed and implemented at the later stages of the Project.

Potentially Affected Parties (PAPs)

- Reindeer herders engaged in reindeer grazing activities and traditional use of living natural resources in the vicinity of the Fedorova Tundra Project site ("Tundra" APC).

This group could be potentially exposed to both environmental and social impacts of the Project, both positive and negative.

- Residents of communities located within the Project's area of influence:
 - Lovozero District residents using the area adjacent to the Project site for hunting, gathering etc.
 - Residents of neighbouring communities (Lovozero and Krasnoschelié villages, Revda township, Kirovsk town²⁰).

This group could be potentially exposed to both environmental and social impacts of the Project, both positive and negative.

- Residents of communities located along the Project routes (Kirovsk town, Apatity town):

Limited potential impacts and risks, both environmental and social, could arise in connection with the Project (a detailed assessment would be undertaken as part of ESIA).

- Vulnerable groups in the affected communities (young families, elderly and single people, people with disabilities):

These groups could be most exposed to the Project's adverse impacts and least able to benefit from it. International lenders require that these people / groups of people be identified for projects financed by the lenders and special attention paid to them when planning impact prevention and mitigation measures. It is recommended that the Operating Company incorporate specific measures for these people and groups of people in their corporate social accountability programmes.

- Small and medium-sized businesses in the Project area:
 - Reindeer herding crews and tribal communities in the Lovozero District. These entities produce agricultural products and may be interested in cooperation.
 - Tourism businesses in the Lovozero District (including tribal communities involved in tourism services). Lovozero District is an attractive tourism destination having a well-preserved and varied biodiversity and cultural assets associated with the traditional cultures of indigenous minorities of the North. For example, Lovozero attracts tourists

²⁰ Here and further in the text of this document, Kirovsk town refers to the Kirovsk Town Municipal District within its territorial limits.

as a centre of Sami culture, while the Seidozero and Lovozero Lakes and Tsaga River contain scenic water tourism routes²¹. It is expected that the Project would not affect local tourism businesses. A detailed assessment will be provided in ESIA, to be built on consultation and other assessment activities. Local tourism organisations might experience positive impact as a result of improved transport infrastructure and easier access to the region.

Stakeholders Involved in the Project Approval Process:

- Murmansk Region government
 - Murmansk Region Ministry for the Development of the Arctic and Regional Economy
 - Murmansk Region Development Corporation JSC
 - The Centre for Support of the Peoples of the North
 - Murmansk Region Ministry of Labour and Social Development
 - Murmansk Region Ministry of Natural Resources, Environment and Fisheries
 - Regulatory and supervisory authorities
 - The Baltic-Arctic Interregional Department of RosPrirodNadzor (Federal Environmental Supervision Authority)
 - The North-Western Department of RosTekhNadzor (Federal Technical Supervision Authority)
 - The Murmansk Region Department of Federal Service for Supervision in Consumer Rights and Human Wellbeing
 - Other authorities
 - Local authorities
 - Lovozero District Administration
 - Lovozero Village Administration
 - Revda Township Administration
 - Apatity Town Administration
 - Kirovsk Town Municipal Entity Administration.
- Parties Interested in Participating in the Project Consultation
- All other stakeholders that might be interested in the Project and are willing to be consulted. These could include:
 - Educational, scientific and research organisations:
 - Kola Science Centre of the Russian Academy of Sciences;
 - Murmansk State Technical University (MSTU);

²¹ The information sourced from websites dedicated to tourism and blogs posted by tourists: <http://wmbel.by/index.php/eshche/tsaga-pana-varzuga>
<http://www.flint.by/reports/Varzuga/>
etc.

- Murmansk Arctic State University (MASU);
- Northern National College (the branch of the Olenegorsk Mining Industry College), Lovozero village;
- Olenegorsk Mining Industry College, Olenegorsk town;
- Georgy Golovanov's Apatity Polytechnic College;
- Khibiny Technical College – the MASU branch in Kirovsk;
- Lovozero Secondary General School;
- The branch of the Murmansk Region Consumers Union Cooperative College, Revda township;
- Environmental and social non-governmental organisations (NGOs) interested in contributing to the Project consultation process (will be identified in the course of consultations):
 - WWF in the Barents Sea Region. This environmental organisation operates in the region and has officially expressed its interest in the Project;
 - Kola Wildlife Conservation Centre. This organisation implements research, conservation and awareness raising projects in the region and may be interested in discussing the Project's environmental and social impacts;
 - Kola Coordination Centre "Geya" NGO²². Though this organisation does not have a formal status, it continues to implement environmental protection and awareness raising projects in the region. They are known to keep an eye on large industrial facilities operating in the region and may be interested in the proposed Project;
 - Bellona Murmansk. This organisation implements environmental commercial projects and operates in the Arctic region;
 - International Social and Environmental Union – an expert community that may be interested in a major project and its social and environmental impacts;
 - "New Town" – Murmansk Regional Non-Governmental Organisation Supporting Comprehensive Socio-Economic Development;
 - Apatity Town Pensioners Association – a social NGO that has not shown interest in industrial projects but may be interested in cooperation on social issues;
 - Apatity Town Council of Youth Organisations – may be interested in cooperation in the area of training and employment.
- Non-governmental organisations representing indigenous peoples of the North:
 - Russian Association of Indigenous Minorities of the North, Siberia and Far East;
 - Lovozero District Sami Community;
 - Iz'vatas Interregional Public Association – a Komi-Izhma Peoples Community in Lovozero District;

²² <https://kec.org.ru/52/>

- Kola Sami Association;
- Saami Council – international non-governmental organisation;
- Murmansk Region National and Cultural Autonomy of Indigenous Sami Peoples.
- Local and regional mass media:
 - Lovozerkaya Pravda newspaper;
 - Murmansk Vestnik newspaper.
- Others.

6. STAKEHOLDER ENGAGEMENT PROGRAMME

An effective stakeholder engagement process includes the following activities:

- early disclosure of adequate information about environmental and social aspects of the Project;
- organization of two-way communication and feedback process;
- development and maintenance of a stakeholder grievance mechanism.

6.1. Information Disclosure

At this stage, public consultation is planned as part of the bankable Environmental and Social Impact Assessment (ESIA).

As the national Environmental Impact Assessment (OVOS) moves forward, the OVOS reports would be also disclosed to the public for consultation.

Public access to the information disclosure package on the Fedorova Tundra Project would be available on:

- The official website of Fedorova Tundra JSC (<https://fedorovoresources.com>) where stakeholders are able to review information about the Project, ask questions and receive answers from the Company's authorised representatives; information leaflets and training materials (as appropriate).

The website includes a dedicated Project section that will contain information about the Project including a complete set of ESIA and OVOS documents and relevant design information.

- Project Information Offices would be maintained in Apatity, Lovozero and Revda, where hard copies of Project reports would be available for the public. The Project Information Offices are located at:
 - **Apatity:** Central Municipal Library, Pushkina Street, 4. Tel./Fax: (81555) 7-08-39, +7 (900) 943 14 72. Opening date: 21 June 2021.
 - **Lovozero:** Lovozero Inter-community Library, Branch No. 1, 184592, Murmansk Region, Lovozero District, Lovozero Village, Vokuyeva Street 2; Tel./Fax: 8(81538)43-592. Opening date: 21 June 2021.
 - **Revda:** Lovozero Inter-community Library, Murmansk Region, Revda, Pobedy Street, 25. Tel: 8(81538)43-592. Opening date: 21 June 2021.

Project updates and announcements will be published through local and regional media, official websites of local and regional administrations, social media and other mechanisms.

6.2. Consultation

The Project will organise and facilitate inclusive consultation with all stakeholders. Some events would bring together all stakeholders but there would be also be thematic consultations intended for specific stakeholder groups.

Broader consultation activities include public consultations as part of both the ESIA and OVOS processes. Thematic activities can include meetings to discuss specific issues and problems identified in the ESIA and OVOS, intended for specific stakeholder groups. These issues could include, for example, land use, use of local workforce, IP communications and engagement, community development opportunities at various stages of the Project lifecycle etc.

In certain unfavourable circumstances such as a pandemic, all stakeholder engagement events involving public gatherings would be moved online; other alternative stakeholder engagement methods would be also employed.

Table 5. Stakeholder Engagement Programme

Activity	Target Group	Disclosure Materials	Date	Responsibility	Venue
1. Providing Common Communication Tools					
Open the Project Information Offices in Apatity, Lovozero and Revda	Local communities, indigenous peoples associations, other stakeholders	Stakeholder Engagement Plan; All ESIA and OVOS documents as they become available; Booklets and other information materials	21.06.2021	Fedorovo Resources, Ecoline	Lovozero Revda Apatity
1.1.	12	17.9	From 21.06.2021 onwards	Fedorovo Resources	fedorovoresources.com
2. ESIA Consultations 15.06.2021 – 28.02.2022					
2.1. Stage 1. Preliminary Environmental and Social Assessment (Environmental and Social Scoping)					
A series of meetings with stakeholders (as part of the social survey)	Local administrations, local communities and vulnerable groups, non-governmental organisations and associations	Environmental and Social Scoping (PESA) Report; SEP; Presentation materials; Project booklets	15.06.2021–07.07.2021	Company / ESIA Consultant; Lovozero District Administration	Lovozero, Apatity, Revda
2.1.1					
Disclosure of the Scoping (PESA) Report and SEP	All stakeholder parties		June 2021 (to be confirmed)	Company / ESIA Consultant	Company website, Project Information Offices
2.1.2.					
A series of roundtable meetings	All stakeholder parties		June 2021	Company / ESIA Consultant	Lovozero, Apatity, Revda
2.1.3.					
Receive feedback from stakeholders	All stakeholder parties		July – August 2021	Company / ESIA Consultant	Company website, Project Information Offices
2.1.4.					
2.2. Public Consultations as part of the full-scale ESIA process December 2021 – February 2022					
Disclose ESIA materials and make them available through the Public Information Offices and Company website	All stakeholder parties	ESIA Report Non-Technical Summary; Environmental and Social Action Plan; Stakeholder Engagement Plan; Environmental and Social Management Plan; Specific Management Plans		Company / ESIA Consultant	Public Information Offices, Company website, mass media
2.2.1.					
Hold public hearings to discuss ESIA materials	All stakeholder parties		4–17 January 2022	Company / ESIA Consultant Lovozero District Administration	Apatity, Lovozero
2.2.2.					
Receive and review comments from stakeholders	All stakeholder parties		February 2022	Company / ESIA Consultant; Lovozero District Administration	Public Information Offices, Internet
2.2.3.					

Activity	Target Group	Disclosure Materials	Date	Responsibility	Venue
3. Public Consultations as Part of OVOS Process to be conducted for each Project component subject to the State Environmental Review (to be identified later) in 2022					
3.1. OVOS ToR Consultations					
Discuss the OVOS ToR (as required by the current legislation)	All stakeholder parties	OVOS ToR	January 2022	Company / ESIA Consultant	Public Information Offices, Internet
3.1.1.					
3.2. Public consultations as part of the full-scale OVOS process					
Conduct public hearings as part of OVOS process	All stakeholder parties	OVOS materials	March–April 2022 (to be confirmed)	Company / ESIA Consultant; Lovozero District Administration	Lovozero
3.2.1.					
4. Thematic consultations with stakeholder groups					
Engagement with indigenous communities and support for traditional lifestyles	Indigenous communities in the Lovozero District, tribal and neighbourhood communities	Indigenous Community Assistance Plan	2021–2022	Company / ESIA Consultant / Council of the MICN Representatives, tribal community representatives	Lovozero
4.1.					
Support for community development	Lovozero District Community	Local Community Development Plan	2021–2022	Company / ESIA Consultant / Lovozero District Administration	Lovozero
4.2.					
Other topics for discussion would be identified through consultation					

7. GRIEVANCE MECHANISM

Various disagreements, disputes or conflicts could arise in the course of the Project. In order to prevent and/or resolve them in a timely and effective manner, IFIs require establishing and maintaining a permanent mechanism for receiving and resolving public grievances and petitions (IFC PS1).

Stakeholder grievances can be submitted to Fedorovo Resources JSC in writing (via the Project Information Offices or by mail to the Operating Company's official address), by e-mail, by completing a grievance form on the Company's official website, or by telephoning the Operating Company during working hours.

Contact information for filing grievances will be published and posted on the Company's website, on community websites and on information boards across the Project area. A grievance can be written in any form and can be anonymous. He/she would only be required to indicate a point of contact (telephone number, postal or e-mail address or otherwise) so that the Company would be able to send a reply. The reply to a grievance could also be posted on the Company's website.

All incoming grievances would be recorded in a dedicated stakeholder grievance logbook. Each applicant/complainant would be informed about the complaint registration number on the day of filing (for complaints submitted personally or by phone) or within three days upon receipt (for complaints sent by ordinary or electronic mail).

The time required to process each complaint would depend on the complexity of the matter but should not exceed 30 days from the date of filing. The reply would be communicated to the address/telephone number specified by the applicant.

Both signed and anonymous grievances would be accepted. However, if a grievant wants to receive a written reply, he or she has to provide reliable contact details. A grievance filed (including anonymous grievances) will be assigned to a competent specialist for reply and identifying appropriate correction measures. The time limit for handling a grievance is 30 days. Each prepared reply will be approved by the Project management and sent to the aggrieved party. Copies of all grievances and replies will be kept by the Operating Company.

Contact Information

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8. MONITORING AND REPORTING

Successful stakeholder engagement requires continuous effort, performance monitoring, analysis and adapting to changing circumstances and stakeholder information needs. Fedorovo Resources JSC will implement the SEP and monitor and analyse the efficiency of stakeholder engagement activities. The initial list of indicators that will be used by the Company for monitoring and improving stakeholder engagement performance throughout the Project is provided below:

- Status and progress of actions identified in the SEP;
- Number of participants in public consultation events;
- Number of people who visit Project Information Offices;
- Number of stakeholder comments and suggestions received by the Operating Company via different feedback channels;
- Number of compliances and grievances received from stakeholders regarding the Project;
- Number of publications covering the Project in the local, regional and federal mass media;
- Types/categories of inquiries lodged via the Project Information Offices;
- Types/categories of stakeholder comments and suggestions, and communication channels used to provide them;
- Key types of grievances (working conditions, land use, environment, labour relations etc.);
- Number of grievances processed in time;
- Number of pending grievances.

When the Project proceeds to the construction stage, the Operating Company would prepare and publish an annual Environmental and Social Accountability Report that must include the following information:

- Project progress;
- The Company's contribution to local/regional socio-economic development;
- The Company's contribution to the combined impact on the environment from industrial operations taking place in the district/region;
- The Company's current environmental and social performance indicators;
- Changes in the Company's environmental and social performance compared to the previous reporting period;
- Measures on improving environmental and social performance implemented over the reporting period;
- Measures on improving environmental and social performance planned to be implemented in the future;
- Local/regional socio-economic development indicators and Company's contribution;
- Charitable activities and environmental/social initiatives undertaken by the Company/with the Company's involvement.

ANNEX 1. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder Party	Role in the Project	Expectations / Concerns
Potentially Affected Parties		
Reindeer herders that could graze their reindeer in the Project area	Tundra APC graze their reindeer in the area of the proposed Project site which would affect a standby grazing area that is not used	Expectations are being verified
Revda township residents	Nearest residential area to the Project site	Could expect employment opportunities (to be verified during consultations)
Kirovsk town residents Apatity town residents	Settlements located along the Project's access route	To be verified during consultations
Lovozero District residents maintaining traditional lifestyle (reindeer herders, gatherers, hunters)	Could use the Project's area of influence as a source of biological resources	To be verified
Stakeholders Having Influence Over the Project		
Governmental and Regulatory Authorities		
Russian Federation Government	Interested in fostering socio-economic development in the Arctic region	Plan to provide support by compensating the cost of infrastructure improvements financed by the Project investors
Murmansk Region Government	The Project implementation is personally overseen by the Murmansk Region Governor A.V. Chibis	To be clarified
Murmansk Region Development Corporation JSC	Attract investors, support industry and infrastructure development in the region	The Project is supported by the Murmansk Region Development Corporation
Murmansk Region Ministry for the Development of the Arctic and Regional Economy	Is responsible for regional economic development	Expect that the Project would contribute to the region's wellbeing (the estimated amount of taxes paid by the Project to the regional budget over the Project life is 90 billion RUB)
Centre for Support of the Peoples of the North	Represent interests of indigenous communities	Expectations and concerns to be verified through negotiations
Murmansk Region Ministry of Labour and Social Development	Provide employment support to local residents and recruitment support to local companies	Expect information on professions required for the Project (to be verified)
Murmansk Region Ministry of Natural Resources, Environment and Fisheries	Regulatory functions with regard to mineral resource uses, land uses and forestry	To be verified
The Baltic-Arctic Interregional Department of RosPrirodNadzor (Federal Environmental Supervision Authority)	Regulatory and permitting functions	Expect the Project to be compliant with the national environmental legislation
The North-Western Department of RosTekhnadzor (Federal Environmental, Technical and Nuclear Power Supervision Authority)	Regulatory and permitting functions	Expect the Project to be compliant with the national occupational health and safety legislation

Stakeholder Party	Role in the Project	Expectations / Concerns
Municipal Authorities		
Apatity Town Administration	To be verified	To be verified
Kirovsk Town Administration	To be verified	To be verified
Lovozero District Administration	To be verified	To be verified
Lovozero Village Administration	To be verified	To be verified
Revda Township Administration	To be verified	To be verified
Environmental and Social NPOs		
GEYA Non-Governmental Environmental Organisation	Though this organisation does not have a formal status, it continues to implement environmental protection and awareness raising projects in the region.	They are known to keep an eye on large industrial facilities operating in the region and could act as a stakeholder interested in the proposed Project. Their expectations and concerns would be verified
WWF in the Barents Sea Region	This organisation operates in the region and is committed to ensuring the ecosystem conservation in the Barents Sea region	They have sent an official letter to the Company, requesting to consider them as a Project stakeholder
Russian Association of Minor Indigenous Peoples of the North, Siberia and Far East	To be verified	To be verified
Kola Sami Association	To be verified	To be verified
NGO for Support of the Murmansk Region Sami Communities, their Legal Awareness Raising and Conservation of Cultural Heritage (OOCMO)	To be verified	To be verified
Iz'vatas Interregional Public Association – a Komi-Izhma Peoples Community in Lovozero District	To be verified	To be verified
Kola Wildlife Conservation Centre	This organisation implements research, conservation and awareness raising projects in the region	Could be interested in discussing the Project's environmental and social impacts
Bellona Murmansk	This organisation implements environmental commercial projects and operates in the Arctic region	To be verified
International Social and Environmental Union	An expert community comprising environmental and social impacts	Could be interested in discussing a major project and its social and environmental impacts
"New Town" – Murmansk Regional Non-Governmental Organisation Supporting Comprehensive Socio-Economic Development	Their focus is on the regional socio-economic development	Could be interested in the Project's social aspects

Stakeholder Party	Role in the Project	Expectations / Concerns
Local Businesses		
Local tourism businesses (to be verified)	Provide services to tourists, organise tourist routes	Expect that the Project impacts would not affect tourist sites
Tribal Communities		
Piras tribal community	To be verified	To be verified
Charr tribal community	To be verified	To be verified
Suima tribal community	To be verified	To be verified
Inces Peiv tribal community	To be verified	To be verified
Kildin tribal community	To be verified	To be verified
Vuavskhes tribal community	To be verified	To be verified
Chigar tribal community	To be verified	To be verified
Research and Education Organisations		
Kola Science Centre of the Russian Academy of Sciences	Conduct research and educational activities in the Project area	Could be interested in cooperation (scientific research and development projects)
Murmansk State Technical University (MSTU)	Train professionals and specialists	Could be interested in training professional staff for the Project
Murmansk Arctic State University (MASU)	Train professionals and specialists	Could be interested in training professional staff for the Project
Northern National College (the branch of the Olenegorsk Mining Industry College), Lovozero village	Located in the municipality hosting the Project	Could be interested in training professional staff for the Project
Georgy Golovanov's Apatity Polytechnic College	Located close to the Project area	Could be interested in cooperation and providing training services (practical training courses for students, training staff for the Project)
Lovozero Secondary General School	Located in the municipality hosting the Project	Could be interested in cooperation (professional orientation, environmental awareness, social support)
The branch of the Murmansk Region Consumers Union Cooperative College, Revda township	Located in the nearest settlement to the Project area	Could be interested in cooperation and providing training services (practical training courses for students, training staff for the Project)
Khibiny Technical College – the MASU branch in Kirovsk	Located close to the Project area	Could be interested in cooperation and training staff for the Project
Mass Media		
Lovozerkaya Pravda newspaper	Could disseminate information about the Project	To be verified
Murmansky Vestnik newspaper	Could disseminate information about the Project	To be verified

ANNEX 2. STAKEHOLDER ENGAGEMENT RULES

The following rules are proposed to be used to ensure effective stakeholder engagement and consultation as part of the Environmental and Social Assessment (ESIA) process:

1. Dissemination of information:

- Key information on ESIA and national OVOS materials is provided in Russian.
- The Project Information Offices would be organised and maintained to improve access to information and documents presenting the results of completed assessments, and receive comments and inquires from stakeholders.
- Environmental and social impact assessment materials would be disclosed and made available for the public. A short non-technical summary reflecting the results and findings of the national OVOS and bankable ESIA would also be prepared.
- Stakeholders would be able to indicate their preferable methods of communicating information.

2. Registration of participants at the public consultation events:

- The registration of participants to ESIA consultations is voluntary and aims to ensure that the participant's views, questions and suggestions are heard and considered; participants are free to introduce themselves as they wish. The registration of participants to OVOS consultations is subject to the procedure specified by RosPrirodNadzor.
- The Company would maintain the data base of all participants to the public consultation process including their names and contact details, which would be used solely for ensuring more effective communication, providing replies to inquires and receiving comments from stakeholders; any other personal data would not be requested and included in the data base.

3. Filing and responding to inquires:

- All inquires will be answered via the same communication channel that has been used by an inquirer (for example, a question submitted in writing through the Project Information Office would be answered by providing a reply in writing to the Project Information Office; a question asked orally would be answered orally). A reply is normally provided within 30 days. If a reply cannot be provided immediately and requires additional research and analysis, the Company would indicate the time required to prepare the reply.
- Stakeholders are able to lodge their inquires through the Public Information Offices; all incoming comments, questions and complaints would be filed;
- The Company would review the incoming questions, comments and suggestions with a view to improving, inter alia, proposed solutions; public consultation does not mean that any approvals and/or endorsements are required from the public;
- All public meetings as part of the ESIA consultation process will be organised by the Company jointly with the local elected authorities and community representatives;
- Meeting records will be maintained during all public consultation meetings; all comments will be thoroughly examined, all questions will be answered and public meeting records will be available in the Project Information Offices.

4. Any face-to-face consultations will be organised and conducted in strict compliance with all pandemic restrictions imposed to prevent the spread of coronavirus.

THESE RULES COULD BE AMENDED AND UPDATED THROUGH CONSULTATIONS WITH STAKEHOLDERS.

