EPANKO GRAPHITE PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

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EPANKO GRAPHITE PROJECT
ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM
SMP01: STAKEHOLDER ENGAGEMENT PLAN (SEP)

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Contents

Acronyms & Abbreviations ................................................................................. 4
SEP - 1 Introduction ......................................................................................... 5
SEP - 2 Project Overview & Setting ................................................................. 7
SEP - 3 Legal and Policy Framework for Stakeholder Engagement .............. 11
  3.1. National Institutional Framework .......................................................... 11
  3.2. National Regulatory Requirements ....................................................... 12
  3.3. International Financing Standards ........................................................ 13
SEP - 4 Summary of Previous Stakeholder Engagement ............................... 15
  4.1. Exploration Phase Consultation .............................................................. 15
  4.2. Stakeholder Engagement for the ESIA .................................................. 15
  4.3. Engagement for Resettlement Planning ................................................. 16
  4.4. Resettlement Working Group & Technical Sub-committees ............... 18
SEP - 5 Stakeholder Identification & Analysis ................................................. 20
  5.1. Affected Communities/Parties ................................................................. 20
  5.2. Other Interested Stakeholders ............................................................... 22
  5.3. Ongoing Stakeholder Analysis, Tracking & Monitoring ....................... 25
SEP - 6 Engagement Approach, Communications Methods & Information Disclosure ......................................................... 26
  6.1. Overview of Stakeholder Engagement Approach ............................... 26
  6.2. Communication/Engagement Methods ................................................. 27
  6.3. Information Disclosure & Disclosure Materials ..................................... 29
SEP - 7 Stakeholder Engagement Action Plan ................................................ 30
SEP - 8 Roles & Responsibilities for Stakeholder Engagement ..................... 41
SEP - 9 Grievance Mechanism .................................................................... 43
  9.1. Grievance Mechanism General Principles & Timescales ...................... 43
  9.2. Grievance Mechanism Steps ................................................................ 45
SEP - 10 Stakeholder Engagement Management System: Management Measures, Monitoring & Reporting ................................................................. 47
  10.1. Information Management ................................................................. 47
  10.2. Monitoring & Evaluation .................................................................. 47
  10.3. Reporting ......................................................................................... 47
SEP - 11 Contact Details for Stakeholder Engagement .................................. 49

Annex A TanzGraphite Grievance Mechanism Forms:
  • Grievance Statement Form.
  • Grievance Receipt Acknowledgement Form.
  • Grievance Investigation Form.
  • Grievance Investigation Outcome Form.
Tables
- Table 5-1 Affected Parties Stakeholder Groups
- Table 5-2 Key National and Regional Government Authority Stakeholders
- Table 5-3 Key Local Government Stakeholders
- Table 6-1 Engagement and Disclosure Methods for Different Stakeholder Groups
- Table 7-1 Stakeholder Engagement Action Plan - Phase A: Pre-Construction & Resettlement Planning
- Table 7-2 Stakeholder Engagement Action Plan - Phase B: Resettlement Implementation (Phase Relocation Programme)
- Table 7-3 Stakeholder Engagement Action Plan - Phase C: Construction and Operations
- Table 8-1 Outline of Grievance Mechanism Steps

Figures
- Figure 2-1 Communities in the Project Area
- Figure 2-2 Main Project (Mine & Process Area within the RAP Area and Access Road)
- Figure 9-1 Outline Flow Chart For Grievance Process

Photos
- Photo 4-1 Epanko Village Meeting – Regional Commissioner and District Commissioner (21st October 2016)
- Photo 4-2 TanzGraphite Welcoming Ceremony (Daily News, 6th December 2016)
- Photo 4-3 Members of the Resettlement Working Group (September 2016)

Boxes
- Box 1-1 Stakeholder Engagement Plan (SEP) (2017)
- Box 6-1 TanzGraphite Stakeholder Engagement Programme Aims

Acronyms & Abbreviations
- ASM: Artisanal & Small-Scale Mining
- MLHSD: Ministry of Lands, Housing & Human Settlements Development
- CLO: Community Liaison Officer
- MPA: Mine & Processing Area
- CRO: Community Relations Officer
- MTL: MTL Consulting Company Limited
- DACs: Directly Affected Communities
- NEMC: National Environment Management Council
- DC: District Commissioner
- PAP: Project Affected Persons
- EIA: Environmental Impact Assessment
- PML: Property Matrix Ltd.
- EIAC: Environmental Impact Assessment Certificate
- PS: Performance Standard
- E&S: Environmental & Social
- RC: Regional Commissioner
- ESIA: Environmental & Social Impact Assessment
- RAP: Resettlement Action Plan
- ESMP: Environmental & Social Management Plan
- RPF: Resettlement Policy Framework
- ha: Hectares
- RWG: Resettlement Working Group
- IACs: Indirectly Affected Communities
- SDM: Social Development Manager
- IFC: International Finance Corporation
- SEP: Stakeholder Engagement Plan
- KNL: Kibaran Resources Ltd.
- TG: TanzGraphite (TG) Limited
- MEM: Ministry of Energy & Minerals
- Tzs: Tanzanian Shillings
- ML: Mining Licence
- TSF: Tailings Storage Facility
- MLA: Mining Licence Area
- WRD: Waste Rock Dump
SEP - 1 Introduction

The Epanko Graphite Project (the 'Project') is located in south-eastern Tanzania, approximately 370 km from Dar es Salaam. The Project is located within the jurisdiction of Epanko Village, a rural area in Ulanga District. Epanko Village comprises of 6 hamlets: Kazimoto, Epanko A, Itatira, Mbera, Luli and Epanko B. The Project is situated in rugged terrain approximately 6 km west of the town of Mahenge. The Project is being developed by TanzGraphite (TG) Ltd (“TG” or “the Company”). TanzGraphite is a Tanzanian subsidiary of the Australian company Kibaran Resources Ltd (“Kibaran” or “KNL”). TanzGraphite will develop and operate the Project.

The mine is expected to have an operational life of at least 20 years. The Project is currently at definitive feasibility level design stage with ongoing activities, including exploration activities to further understand the graphite resource and resettlement planning. The Company is aiming to commence production in 2018. The schedule will be further detailed as part of the resettlement planning during Quarter 1 2017.

The Project will provide major benefits to the local community in terms of employment, incomes and education and training. This document sets out the stakeholder engagement processes that will be implemented for the Project, including those actions to support the implementation of the Resettlement Policy Framework (RPF). The RPF document provides the framework for resettlement, compensation and assistance for those affected by the Project.

Underlying this SEP and the RPF and the actions contained within them is the commitment of TanzGraphite to ensure that the wealth created and benefits flowing from the Project are shared with the local community. This includes the opportunity to share in future income, employment, business opportunities and education flowing from the Project. Once in operation the Project will provide over 200 jobs and generate over $200 million in taxes for the national and local governments.

The Board and Management of TanzGraphite have extensive expertise in the mining sector from exploration through project development and operational management of a number of Projects in Australia and Africa. While working together on the first modern gold mine to operate in Tanzania the management team was recognised by the Tanzanian Government for their initiatives and commitment to the surrounding communities and the Environment winning the first two Presidential Awards.

Following submission of an Environmental & Social Impact Assessment (ESIA) to the National Environment Management Council (NEMC) TanzGraphite received its Environmental Impact Assessment Certificate (EIAC) (EC/EIS/1828) on the 23rd April 2015 which is a pre-requisite for a Mining Licence in Tanzania. In July 2015 TanzGraphite received a Mining Licence (548/2015) covering a Mining Licence Area (MLA) within Epanko of 9.49 km². An update to the ESIA has been prepared providing additional details on the Access Road and updated to meet the provisions of international financing standards of the International Finance Corporation (IFC)¹ and the Equator Principles². A draft of the updated ESIA (2016) has been submitted to NEMC and is awaiting approval. NEMC have requested a copy of the Resettlement Policy Framework (RPF) in order to approve the updated ESIA.

TanzGraphite will develop the Project to meet or exceed the legal and regulatory requirements of Tanzania and in a manner consistent with international best practice. One of the recommendations of international best practice is a comprehensive stakeholder engagement programme, including development and implementation of a Stakeholder Engagement Plan (SEP) that is scaled to the project risks and impacts and tailored to the characteristics and interests of the Affected Communities. TG have prepared and disclosed on its website http://www.kibaranresources.com.au/tanzgraphite/social-and-environmental a Stakeholder Engagement Plan (SEP), as well as the Resettlement Policy Framework (RPF) and other Environmental & Social (E&S) documentation.

² Equator Principles III (June 2013) http://equator-principles.com/resources/equator_principles_iii.pdf
Box 1-1 Stakeholder Engagement Plan (SEP) (2017)

This Stakeholder Engagement Plan (SEP) outlines the approach and actions TanzGraphite will undertake for engagement with stakeholders and local communities about the Project and the related land acquisition and resettlement programme. The SEP outlines Tanzgraphite’s approach to ensure Informed Consultation and Participation (ICP) using prior information sharing, discussion and consultation to enable participation of affected persons and interested stakeholders in the Project decision-making. This SEP builds on the Company’s major focus on community engagement. It identifies the main stakeholders affected by, or with an interest in, the Project, and includes actions for structured ongoing engagement with these stakeholders, particularly the local communities. The SEP includes a grievance mechanism for stakeholders and people to raise their concerns about the Project, including land and resettlement related complaints and issues. The SEP shall be a live document and will be updated periodically.

The future stakeholder engagement programme phases are outlined below:

- PHASE A: Pre-construction & Resettlement Planning.
- PHASE B: Resettlement Implementation (Phased Relocation Programme).
- PHASE C: Construction & Operations Phase.

Phases B & C may overlap as the relocation programme will be phased and access will be taken to specific areas for construction where relocation has been completed and compensation paid. Further details will be provided in the detailed RAP. This SEP covers the proposed engagement activities for these phases, however more detail is provided for engagement activities planned for Phases A & B. This is because engagement activities performed in these phases will provide at least some of the information as to the needs of the communities in the subsequent phases. Future updates of the SEP will include this information, and will eventually also include closure phase requirements as those details are established.
Project Overview & Setting

Project Overview

Graphite is regarded as a critical mineral for future global industrial growth, destined for industrial and technology applications including lithium-ion battery manufacturing. The favourable conditions for the development of the Project includes the potential long-term global demand of graphite which is expected to double within the next eight years. This is mainly driven by the growing number of applications in technology, industrial and new energy markets and finally by the fact that China which produces 75% of global graphite supply, is now restricting exports to protect domestic supplies.

The Project is located within the jurisdiction of Epanko Village, in rugged terrain approximately 6 km west of the town of Mahenge. Epanko Village comprises of the hamlets of Kazimoto, Epanko A, Itatira, Mbera, Luli and Epanko B in Ulanga District (Figure 2-1 shows the hamlets forming Epanko Village – there are other communities are along the Access Road (see Table 5-1)). The village includes a Primary School, an unfinished Dispensary and a Catholic Church.

The Project will involve open pit mining of two graphite deposits, and construction of a graphite flotation processing plant, Tailings Storage Facility (TSF) and associated Waste Rock Dumps (WRDs). There will also be infrastructure improvements associated with development of the Project and provision of an Access Road to the Mine and Processing Area (MPA); this is also known locally as the RAP Area. The general layout of the Project facilities is shown in Figure 2-2.

Project Setting

Generally, Ulanga District experiences a bi-modal rainfall pattern with long rains between March and May and short rains between November and January.

A survey of the area has identified the surface water sources - streams and springs - and also the uses of water by the local communities - wells, village bores and boreholes. The eastern side of the Project area is drained by perennial streams including the Ekauli and Mkoko streams. These flow into the Epanko/Shilangazi River which flows north and west out of the Project area, before joining the Mbili stream, which drains the western valley of the Project area. This combined stream flows northwards away from the Project area, eventually joining the Luli river, which flows eventually into the Kilombero River downstream. These streams in the Project area are mainly fed by springs emanating from the surrounding hills, as well as from rainwater run-off.

Water to supply the processing plant will be taken from a combination of rainwater captured from the upstream catchments, and surplus water taken from the wet tailings deposited in the Tailings Storage Facility, which will be treated before use. Together, these sources will be more than sufficient for the processing plant. Water from dewatering of the mine pits will be discharged into the Shilangazi stream. Additional groundwater will be pumped to supply drinking water for the accommodation camp, and for dust control of the haul roads. The total potable requirements for the worker accommodation camp, laboratory and site office averages 50m³ per day, and will likely be sourced from a borehole within the RAP Area.

The Project area includes agricultural land, with rural housing and community assets. Development of the Project, including the new Access Road (Figure 2-2), will require land acquisition, resettlement, compensation and livelihood restoration assistance. The Access Road route has been designed to avoid mining related traffic going through Mahenge town, in order to reduce community and road safety risks. The Project is preparing a Resettlement Action Plan (RAP) which establishes the detailed processes of land acquisition, compensation and resettlement, and identifies how these processes will be implemented. The Project has already prepared the pre-cursor to the RAP, the Resettlement Policy Framework (RPF). The RPF and RAP will comply with Tanzanian legislation and the requirements of international financing standards.

For the mine RAP Area, some households within Kazimoto, Epanko A and Itatira will be physically displaced. It is expected that the majority (approximately 90%) of households in Kazimoto and almost all households in Epanko A will need to be physically displaced. Around 45% of households in Itatira will be physically displaced with a further 20% being affected by economic displacement (loss of land) only. An estimated 322 households will be physically displaced from the RAP Area and be offered relocation by TG. Approximately 81 households own fields only (in the RAP Area) and will be economically displaced and eligible for compensation for this loss of land. These households live in various other communities in the surrounding area including from Luli, Mbera, Epanko B, Nawenge and Mahenge.
Figure 2-1 Communities in the Project Area
Figure 2-2 Main Project (Mine & Processing Area within the RAP Area and Mine Access Road³)

³ The mine Access Road land surveys are ongoing and may be subject to some slight deviations (e.g. to avoid graves etc.).
Project Area of Influence

Directly Affected Communities (DACs) will be those containing the land or assets that require physical and/or economic displacement or those that may be affected by potential impacts from the mine due to their close proximity to the MPA (i.e. the RAP Area) and new Access Road. This would include neighbouring communities with the potential of being impacted by changes in dust levels, noise and vibrations, access to employment opportunities, accidents, influx of people and increase in pressure on the water resources, etc.

Based on work to-date, the DACs are considered to include: the six (6) hamlets of Epanko Village: Kazimoto, Epanko A, Itatira, Mbera, Luli and Epanko B; Nawenge Ward (including Nawenge, Kisewe and Sangu Sangu Villages); Vigoi Ward (Mbagula and Makanga villages); and the host community in the final resettlement village site location. Investigations to confirm the resettlement village location are underway and further details will be provided in the RAP.

Directly Affected Communities along the Access Road will be those owning affected land that requires economic displacement or communities that may be affected by potential impacts due to their close proximity to the Access Road corridor. The DACs along the Access Road corridor are considered to be Epanko, Kisewe and Nawenge in the Nawenge Ward and Mbagula and Makanga villages in the Vigoi Ward. Further detailed investigations to identify all DACs along the Access Road corridor are underway along with the associated land & asset surveys and preliminary valuations.

The relocation of a portion of the hamlet of Itatira and a significant portion of the hamlets of Kazimoto and Epanko A will be necessary. Relocation is planned to occur approximately 12 - 18 months after the approval of the RAP. A phased approach to resettlement of the impacted hamlets is planned. Access will not be given to areas for construction before resettlement of households and payment of compensation for loss of land and assets.

Indirectly Affected Communities (IACs) are those residents, businesses, government officials and administrators of the villages and Wards who may be indirectly affected by employment opportunities (including communities that might provide workers to the mine), influx and the related pressure on resources and services. These communities potentially include Mahenge, Msogezi, Mdindo and Isongo. Each of these communities are within approximately 6-30 km of the Project.

The mine will operate initially on 5 days a week, 9 hours per day roster, with the exception of the processing plant which will be operating 24 hours a day, 7 day a week. TG has committed to the recruitment, training and development of local citizens for the Project. Priority for employment will be given to applicants from local towns and villages near the Project site, including Epanko Village. The total compliment of the mine will be approximately 213 employees, with over 200 of these being nationally and local community sourced employees. TG has committed to providing preferential access to skills training and employment opportunities for affected persons, including the Epanko Village households.

A full Project Description is provided within the TanzGraphite updated Environmental & Social Management Plan (ESMP) package.
SEP - 3  Legal and Policy Framework for Stakeholder Engagement

TG will develop the Project to meet or exceed the legal and regulatory requirements of Tanzania, in a manner consistent with international best practice. The key regulations and standards relevant to stakeholder engagement are summarised below.

3.1. National Institutional Framework

The national institutions responsible for overseeing the implementation of the Project and for environmental approvals for mining projects are:

- The Ministry of Energy and Minerals (MEM) is responsible for setting and monitoring the implementation of policies, strategies and laws related to energy and mineral resources. The Ministry's activities include the issuing of mining licenses and permits.

- The National Environment Management Council (NEMC) is responsible for environmental permitting and enforcement of environmental laws. As part of the permitting process, NEMC carries out reviews and monitoring of ESIAS and is an integral part of the ESIA process. NEMC is also responsible for facilitating public participation in environmental decision-making.

- The Ministry of Lands, Housing & Human Settlements Development (MLHHSD) has responsibility for land use planning and valuation and compensation at the national level.

SEP-5 Stakeholder Engagement & Analysis, provides a full list of the key institutions with respect to the Project, including those key stakeholders at the District, Ward, and Village level. The Government authorities and agencies who have been and will be consulted during the development of the Project and ESIA, are described in SEP-4 Summary of Previous Stakeholder Engagement and SEP-7 Stakeholder Engagement Action Plan, respectively.

Government Agencies Responsible for Environment Management

The administrative and institutional arrangements for environmental management for all sectors in Tanzania are stipulated in the Environmental Management Act No. 20 of 2004 (EMA). The Minister responsible for environment (Vice President’s Office) has overall responsibility for matters relating to environment. In discharging these issues, the Minister is assisted by the Director of Environment who is the technical person responsible for advising the Government and coordinating environmental management issues within the Government.

The National Environment Management Council is a corporate body under the Vice President’s office which is responsible for day-to-day environmental management issues and is responsible for undertaking enforcement, compliance, review, monitoring and assessment of environmental matters.

Each Ministry is required to have a Sector Environment Unit to advise the Government on issues specific to the sector and ensure the Ministry complies with the requirements of the EMA. At the Regional level, the Regional Secretariat is responsible for co-ordination of all advice on environmental management in their respective regions and liaison with the Director of Environment and the NEMC Director General on the implementation and enforcement of the EMA.

Environmental Management at Regional and District Levels

The Regional Administration Act No. 9 of 1997 provides for Regional Commissioners (RCs) to oversee Regional Secretariats, with District Commissioners (DCs) directly supervising the District Councils. Local authorities oversee the local planning processes, including establishing local environmental policies. The National Environmental Policy establishes a policy committee on environment at the Regional level chaired by the Regional Commissioner, mirrored by environmental committee’s at all lower levels, i.e. at the District, Division, Ward and Village or “Mtaa” councils.

At the Local Government level, an Environmental Management Officer should be designated or appointed by each City, Municipality, District or Town Council. In each City or Municipality or District, Environmental Committees should be established to promote and enhance sustainable management of the Environment.

The Village Development Committee is responsible for proper management of the environment in their respective areas. The District Council designates for each administrative area (including urban areas, wards, villages and other
neighbourhoods) an Environmental Management Officer to coordinate all functions and activities related to protection of environment in their area.

3.2. National Regulatory Requirements

The Tanzanian Government has several key regulatory requirements that relate to exploration and mining, the ESIA process, and stakeholder engagement. The key ones related to environmental management and stakeholder engagement of mining projects are summarised below:

**The Mining Act 2010:** Including Section 5, stating that minerals on, in or under the land are controlled and vested in the United Republic, i.e. the State. Section 6 states that no person shall, on or in any land, prospect for minerals or carry on mining operations except under the authority of a mineral right granted under the Mining Act.

**National Environmental Policy (1997) (NEP):** This Policy provides guidance on the overall responsibilities for the management of the environment at the national level. It contains a cross-sectorial policy for public participation and education. The NEP places emphasis on public consultation as an effective tool in the EIA process.

**Environmental Management Act (No.20/2004) (EMA):** ESIA studies are mandatory for all Projects applying for mining or special mining licenses in accordance with the Mining Act, 2010 and its associated environmental regulations. The Environmental Management Act also requires all mining projects to conduct an ESIA prior to commencement of any operations. The procedures for conducting ESIAs are set out in the Environmental Impact Assessment and Audit Regulations, (GN 349/2005). This Act provides the legal and institutional framework for sustainable management of the environment. This law sets out the principles for environmental management; environmental impact and risk assessments; prevention and control of pollution, compliance and enforcement; waste management; environmental quality standards; and public participation. This law sets out the obligations and responsibilities for impact assessments, including the requirements for public participation. The Act includes a list of types of projects that require EIAs, which includes mining projects.

**Environmental Impact Assessment and Audit Regulations (GN 349/2005):** These regulations set out the form and content of EIAs and details on the requirements and processes related to EIAs. These regulations include requirements for public consultation and disclosure during the EIA process. Article 17 of the regulations outlines the specific requirements for public participation which in summary comprise:

- The Company, in consultation with NEMC, should seek the views of affected and potentially affected stakeholders.
- Following approval of the Project Brief (during the scoping phase to inform the Terms of Reference (ToR)) the Company should publicise in public places, in a nationwide newspaper and on radio station(s) (in both Kiswahili and English languages) the Project and its likely impacts and benefits. They should also hold, where appropriate, public meetings with affected parties and communities to explain the Project, its effects and to receive their verbal or written comments.
- Following receipt of the EIA NEMC may decide to call a Public Hearing, if deemed necessary, with relevant communities and other stakeholders.

**Tanzania Women and Gender Policy (2000):** The overall objective of the Gender and Development Policy is to promote gender equality and equal participation of men and women through facilitation of access to education, child care, and employment and decision making.


The Constitution of Tanzania and land related legislation establish:

- Rights to own land, including customary land ownership.
- Classification of land, including customary land and communal land.
- Rights to compensation for loss of land.
- Power of compulsory acquisition of land when in the public interest, including for mining of minerals.

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4 Note for the purpose of this document ESIA is considered to be the same as EIA
• Establishment of wayleaves and rights of way.
• Obligations for holders of mining licences to implement plans for relocation, resettlement and compensation to people within the mining areas in accordance with the Land Act.
• Requirements for the serving of notices and disclosure of information relating to land acquisition and wayleaves.
• Methods for valuing land and assets and for calculating compensation due.
• Requirements for prompt payment of compensation.
• Rights for appeals and grievance resolution.

Tanzanian legislation relevant to Project land acquisition, compensation and resettlement planning (listed below) include requirements for public participation and engagement with affected persons:

- Land Act, Cap 113 R.E. 2002, as amended from time to time.
- Mining Act 2010.
- Land Acquisition Act, Cap 118 R.E. 2010.
- Village Land Act, Cap 114 R.E. 2002, as amended from time to time.

In addition, the new Valuers and Valuation Registration Act (recently enacted on the 1st Jan 2017) sets out requirements in areas such as cut-off dates for eligibility for compensation for loss of land and assets.

In addition to the key requirements above, there are a number of supporting laws that regulate environmental and social management in Tanzania. A more detailed description of the legislation relating to land acquisition, compensation and resettlement is included in the Project Resettlement Policy Framework (RPF).

3.3. International Financing Standards

TanzGraphite (TG) are seeking debt finance to develop the Project from international finance institutions (IFIs), including German KfW IPEX-Bank (KfW) who have adopted the Equator Principles III (EP III).

Equator Principles III (2013)

The Equator Principles III, adopted by 89 financial institutions in 37 countries around the world, impose a minimum set of requirements regarding environmental and social performance of companies. They are applicable to all new Project Finance transactions with a project capital cost over 10 million dollars and which may have significant environmental or social impacts. The Equator Principles were established in 2003 by a group of international lenders for managing social and environmental issues related to financing of development projects in the extractive industries sector. The Principles are based on the IFC Performance Standards but also include some additional requirements for Equator Principles banks.

For all Category “A” and Category “B” projects, the Project Sponsor is required to complete an Environmental Assessment (EA). For Category “A” projects the EA report is typically an ESIA. Each assessment, as well as the final EA document package, requires a variety of disclosure and consultation activities. The Principles state that the EA should address “participation of affected parties in the design, review and implementation of the project.” The Epanko Graphite Project would be considered a Category “A” project under the Principles. It is the intention of TG to meet the Equator Principles requirements.

International Finance Corporation (IFC) Performance Standards (PSs) on Environmental & Social Sustainability (2012)
The Company will develop the Project in accordance with the requirements set out in the IFC Performance Standards (2012). The IFC Performance Standards form part of their Sustainability Framework. Performance Standard (PS) 1 sets out the recommendations for stakeholder engagement which are summarised below:

- Stakeholder engagement is an on-going process that may involve: stakeholder analysis & planning, disclosure & dissemination of information, consultation & participation, grievance mechanism, and on-going reporting to Affected Communities.

- A SEP will be developed and implemented that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities. Where applicable, the SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable.

- Affected Communities will be provided with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.

- When Affected Communities are subject to identified risks and adverse impacts from a project, a process of consultation will be undertaken in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them.

- The extent and degree of engagement should be commensurate with the project’s risks and adverse impacts and concerns raised by Affected Communities.

- The consultation process will be tailored to language preferences of Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups.

- For projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation (ICP) process - (due to the physical displacement of households this SEP reflects this more in-depth approach to consultation).

- A grievance mechanism will be established to receive and facilitate resolution of Affected Communities’ concerns and grievances about the client’s environmental and social performance.

Specific requirements relating to community engagement are contained within other IFC Performance Standards, of particular relevance to the Project are those within PS 5 Land Acquisition and Involuntary Resettlement and PS 8 Cultural Heritage.

The IFC also have several guidance documents and Good Practice Notes (GPN) relevant to community engagement including "Stakeholder Engagement: A Good Practice Handbook for Companies doing Business in Emerging Markets (2007)". Inherent in much of this guidance literature is the critical importance of a sustained and carefully planned consultation programme with stakeholders, especially communities likely to be affected by the Project.

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1 IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts; 1 January 2012. pg 7-9.
SEP - 4  

Summary of Previous Stakeholder Engagement

Since the start of the Project development, TG have undertaken engagement with relevant government agencies at the National, Regional and District level, and with the potentially Affected Communities. Stakeholder engagement has been conducted in accordance with the relevant Tanzanian requirements. Also, the requirements of the IFC PSs (2012) have been considered in ensuring compliance with the internationally recognised good practices. The objectives of public participation and consultation to-date were to:

- Identify potential stakeholders that could directly/indirectly be affected by the Project both negatively and positively.
- Introduce the proposed Project to the stakeholders with special reference to its key components.
- Seek stakeholder views on critical issues that might affect them during the different phases of the Project.
- Obtain and establish baseline data that will be used for future monitoring and control.
- Ensure stakeholders views and concerns are considered in the preparation of environmental management and monitoring plans.
- Establish communication mechanisms between stakeholders and the Project proponent.
- Ensure that a sufficient level of community sensitisation engagement occurs prior to and during surveys and the preliminary valuation of land and assets.

4.1. Exploration Phase Consultation

Since commencing exploration of the Project TG have undertaken extensive engagement with relevant Government offices at the National, Regional, District, Ward and Village level. This has included with key stakeholders such as the Ministry of Energy & Minerals, Morogoro Regional Commissioner, Ulanga District Commissioner, Council and Officers, and Nawenge Ward Executive Office. The initial engagements during exploration were essential to build relations with key stakeholders and established a base on which to undertake the ESIA programme consultation and subsequent resettlement planning.

To inform the local affected communities of the exploration activities and seek necessary approvals for temporary land access for drilling and other studies TG have undertaken various engagement activities. These are now managed as part of the overall engagement for the resettlement planning programme (summarised below). Due to the lessons learnt during the exploration phase and early resettlement planning TG in 2016 heavily invested in its internal community relations resources in Mahenge and Epanko by establishing a permanent Social Development Team. The team is led by a Social Development Manager (SDM) supported by a Community Relations Officer (CRO) and two Community Liaison Officers (CLOs). This team is also supported on the resettlement side by the Tanzanian Registered Valuers (Property Matrix Ltd (PML)), Tanzanian Social Consultants (MTL) and an international resettlement planning and Environmental & Social consultancy, Zyl Consulting (ZC).

4.2. Stakeholder Engagement for the ESIA

During the original ESIA preparation and finalisation the stakeholders consulted included individuals, groups or organisations (including governmental and non-governmental) that might be affected by the Project activities. They were identified from the National, Regional, District, Ward, and Village levels. They included community members for the Nawenge, Epanko and Kisewe Village Councils, Nawenge Ward Development Committee (WDC) and different community groups including institutions, community based organisations (CBOs), Faith Based Organisations (FBOs) etc. Other stakeholders included Ulanga District Leadership, Regulatory Authorities (Occupational Health and Safety (OSHA) of Eastern Zone Mining Office, Government Chemist Laboratory Authority, Ministry of Water - Rufiji Basin Water Office, Ministry of Natural Resources and Tourism – Forest Department, and VPO-DoE, NEMC and Ministry of Energy & Minerals (MEM), TANROADS and TANESCO. The stakeholders were engaged in several ways including consultative meetings, Focus Group Discussion (FGD), and key informant interviews (KIIs).

Two rounds of public consultation meetings were held for the ESIA. Public consultation meetings were held during the scoping phase and a second round to discuss the initial results of specialist studies (ESIA). Posters and local and national media were also used to disseminate Project information.
Focus Group Discussions were conducted with different social groups in the community, including local farmers, youths, local leaders, and elders. Key informant Interviews were conducted with local leaders and extension officers including Ward Executive Officers (WEOs), Village Executive Officers (VEOs), teachers, agricultural officers, health officers and community development officers.

Throughout, specific regulatory requirements were followed such as the use of “Daily News” (for English) and “Mwananchi” (for Kiswahili) newspapers and announcements in Kiswahili and English on “Radio Ulanga FM” to advertise the consultation events, supplemented by local invitation letters and posters.

During the consultations, various positive and issues that may require mitigation related to the Project and the proposed activities were identified. The main issues that were raised by stakeholders included the following:

- The extent to which local communities would receive the benefits of the Project, such as provision of employment and contribution to the development of social services such as education, water, health and improvement of livelihood activities.
- That TG should minimise resettlement impacts as much as possible and if relocation is unavoidable those affected should be given a fair and prompt compensation considering all losses.
- Stakeholders expressed concerns that water sources in the Project area could be polluted by mining activities or that the Project might use large amounts of the available water resources.
- Concern that there will be a population increase in the area seeking employment and business opportunities that may lead to various social problems including increase in cost of living, increased rate of spread of HIV/AIDS and sexually transmitted diseases and increased crime.
- Concern about the potential impacts on air quality, vibration and noise, including that blasting practice may lead to physical destruction of houses and cause land tremors.
- Concern that the construction and mining activities may lead to disappearance of local species due to clearance of vegetation and cutting of trees.
- There was concern that during the construction phase heavy trucks and vehicles will be hired for hauling equipment and materials and may lead to the destruction of the access roads and that the Project might restrict the local residents from accessing the pathway from Epanko to Kisewe.
- Members of the surrounding communities were worried that access to natural resources including firewood, thatching material and hunting of wild mammals will be restricted.
- That the construction activities may affect the cultural resources that exist in the area, including graveyards and sacred places.

4.3. Engagement for Resettlement Planning

Stakeholder engagement and community relations activities are central to the resettlement planning for the Project. A range of stakeholder engagement activities with respect to resettlement planning have been underway since 2015, including with the local community, District, Regional and National stakeholders, such as the MLHHSD, the Ministry of Energy & Minerals (MEM) and District and Village leadership.

Over the last 18 months this has included the following key activities:

- Establishment and operation of the Resettlement Working Group (RWG) (see Section 4.4) and technical Sub-committees. The establishment of the Resettlement Working Group (RWG), including village and hamlet representatives was a key challenge to the resettlement planning. The Company sought assistance with trying to move the process forward from the District, the Regional Commissioner and, at a national level, the Ministry of Energy & Minerals (MEM). This resulted in a Task Force being established by the Regional Commissioner. The Task Force held community sessions where representatives from the hamlets were elected onto the RWG. Following this, the first RWG meeting was held on the 29th June 2016 with 4-6 weekly RWGs being held subsequently, plus technical Sub-committee meetings.
- TG Social Development Team - During Quarter 3 TG established a full-time Social Development Team in Mahenge and Epanko. Extensive consistent consultation activities have been undertaken during Quarter 4 2016 regarding resettlement planning to ensure the affected community were informed and understood the purpose of the surveys
and valuations and were supported to participate in the resettlement planning. During the initial surveys in 2015 household participation was very low. TG then undertook significant engagements early in 2016 with National, District, Ward and Village level stakeholders to enable an effective consultation forum to be established, the Resettlement Working Group (RWG). Participation in surveys and engagement meetings by Project Affected Persons (PAPs) is now good (as demonstrated by nearly 80% participation during the first rounds of surveys in late 2016) and the TG community relations office was established in Epanko Village during Quarter 4 2016.

- Extensive community sensitisation activities have been undertaken for the socio-economic and land & asset surveys, preliminary valuation and cut-off for eligibility for the mine RAP Area (2016), these have included:
  - TG with PML undertook extensive community sensitisation with households and hamlet heads to raise their awareness on the need to participate in the surveys and preliminary valuation and to plan the programme so households were available. TG also provided letters to households notifying them of the surveys and preliminary valuation programme. The District Commissioner made announcements encouraging households to participate on Ulanga Radio. TG with PML also are using Ulanga Radio as a communications tool. Also, PML (with the Morogoro Regional Valuer) made households aware during surveys that only assets present from the commencement of the survey and valuation exercise would be valued and eligible for compensation.
  - The Regional Commissioner and District Commissioner with facilitation from TanzGraphite held a village meeting in Epanko on 21st October 2016 to announce the survey & preliminary valuation programme and to encourage households to participate - Photo 4-1.

*Photo 4-1 Epanko Village Meeting – Regional Commissioner and District Commissioner (21st October 2016)*

- Epanko village meetings, hamlet focus group discussions and feedback sessions from the Resettlement Working Group (RWG) meetings.
- On-going engagement with the Regional Commissioner, including site visits and village meetings. Regional Officers also form part of the RWG, including for legal, minerals, valuation matters etc.
- On-going engagement with the District Commissioner and on-going engagement with relevant District officers, including District Executive Director and District Council. District Officers for various technical aspects have been involved centrally in several of the resettlement planning activities, including the officers responsible for land, town planning, environment, education etc. Engagements have also been undertaken with the District Chief Medical Officer.
- On-going engagement with Village and Ward Executive Officers.
- Using the Traditions & Cultural Heritage Sub-committee of the RWG engagement with the elders and traditional leaders has been possible. This has enabled TG to obtain a better understanding of the tangible and intangible cultural heritage sites and traditions in the Project area. PML, with TG and ZC, are in the process of surveying the cultural sites (including graveyards). This has required extensive engagement with this group to provide permission to the Company and its consultants to visit the sites. During December 2016, the Sub-committee held in Epanko Village a ceremony to officially welcome TG to the Project area, which was an essential step in the Project development – see Photo 4-2. TG are now supporting a series of rituals for the traditional leaders prior to completing the cultural heritage surveys during January and February 2016.
A formal **grievance mechanism** was operationalised by TG, with the process involving the Epanko Village Executive Officer and the RWG Grievance Recording & Disputes Resolution Sub-committee — see Section 8.

**Artisanal & Small-scale Mining (ASM)** - TG are in the process of engaging with this group of stakeholders. The socio-economic survey has collected data on the reliance at a household level on income generated from Artisanal & Small-scale Mining activity on both a regular and seasonal basis. This data, along with the mapping exercise which is currently on-going will be used to inform an Artisanal Miners Interface Management Plan. During the engagements to-date two representatives have been appointed to represent the informal miners operating within the RAP Area at the RWG. Formal ASM activity undertaken on Primary Mining Licenses (PMLs) or Gemstone Mining Licenses (GMLs) has been identified and licence holders contacted to determine the preferred engagement method. The majority of these licence holders are not based in Mahange and have opted not to participate in the RWG but to receive other correspondence.

### 4.4. Resettlement Working Group & Technical Sub-committees

A Resettlement Working Group (RWG) has been established for the Project by TanzGraphite. The RWG includes representatives of TG, the hamlets (including elders) and administrative representatives, including from a National, Regional, District, Ward and Village level. The hamlet representatives also holding meetings at a hamlet level to put forward summaries of the RWG discussions and seek inputs/views from the hamlets which are reported at the following RWG.

The following RWG Sub-committees have been established comprising of: hamlet representatives; relevant technical District and Regional officers; representatives of the Ministry of Energy & Minerals, the Wards and the Village Council; representatives of the artisanal miners; and the independent Community Legal Advisor (TG have provided funds to the Epanko Village Council to engage a legal advisor that will be available to the community members involved in resettlement activities):

- Education Sub-committee.
- Grievance Recording & Resolution Sub-committee.
- Health & Environment Sub-committee.
- Alternative Land Sub-committee.
- Alternative Roads Sub-committee.
- Valuation & Compensation Sub-committee.
- Livelihood Restoration Sub-committee.
- Traditions & Culture Sub-committee.
The RWG invite other technical persons and authorities whenever necessary to facilitate specific discussions, decisions and functions. The RWG is crucial for helping to implement the community engagement programme, enabling information to be disclosed in an appropriate understandable way and in acting as a grassroots group that can actively engage with local people/PAPs and receive their input and concerns. Key inputs to-date have included: views on compensation options; need to undertake detailed engagement on the valuation methodology; support with disputes (i.e. participation in surveys); identification of possible replacement land/locations for the resettlement village; support with establishing a representative Epanko Village leadership to be part of the RWG/resettlement planning etc.

RWG’s are held every 4-6 weeks. Technical RWG Sub-committee working sessions are also being held to move forward specific aspects of resettlement planning and obtain views from the stakeholders to inform key matters. Avoidance and mitigation measures for other topics raised during the ESIA process and exploration programme also continue to be addressed at a number of these RWGs and related forums.

A Memorandum of Understanding (MoU) has been established for the RWG to define the objectives, membership, roles and responsibilities and operational arrangements for the Resettlement Working Group.

The responsibilities of the RWG include:

- Acting as a conduit for communication between PAPs, the Company, various groups and institutions involved in the land acquisition, compensation and relocation process.
- Assisting in the dissemination of information regarding the relocation and compensation process to those impacted and advising on the need for community information regarding the mining project and land acquisition requirements and processes.
- Assisting in the identification of absent PAPs and vulnerable people in the land acquisition and resettlement process.
- Facilitating negotiation with affected communities on modes and options for resettlement, compensation, and livelihood restoration.
- Overseeing the process of compensation, resettlement, and livelihood restoration, and helping to ensure that the process is fair and transparent.
- Reviewing and assisting in resolving any disputes, complaints and concerns related to resettlement and compensation raised by communities/individuals.
- Conducting periodic meetings to review the progress of planning and implementation of the land acquisition and resettlement process.
- Providing progress reports to relevant authorities and the management of TanzGraphite.
To ensure meaningful and effective consultations, an essential element of the stakeholder engagement process is the careful identification of potential stakeholders and examining their concerns, expectations and preferences. The Environmental Impact Assessment and Audit Regulations, 2005 and the IFC Performance Standards propose a thorough identification of stakeholders. The identification of stakeholders for this Project followed the procedures outlined in IFC PS1 (2012); Assessment and Management of Environmental and Social Risks and Impacts. Section 26 of PS1 requires the proponent to identify the range of stakeholders that are directly or indirectly affected by the Project.

Following this guidance, the two principal groups of stakeholders are:

**Affected Communities/Parties**: people/entities directly affected by the Project and/or have been identified as the most vulnerable to change and who need to be engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures, namely:

- Households and farmers who will be physically displaced from their properties through the establishment of the Mine & Processing Area and its buffer zone.
- Households and farmers who have been economically-displaced through the loss of access to wells/springs etc., physical disturbance from air or noise emissions and/or reduced access to farming land.
- Vulnerable groups and persons.
- Residents who may be affected by employment opportunities, influx and the related pressure on resources and services.
- Businesses, government officials and administrators who may be affected by employment opportunities, influx and the related pressure on resources and services.
- Employees, Contractors and Subcontractors of TanzGraphite.

**Other Interested Parties**: people/entities that are interested in the Project and/or believe the Project could affect them, or they the Project, in some way:

- Residents of adjacent Wards and the Districts, as well as the general public of Tanzania.
- Civil society, NGOs and CBOs.
- Government of Tanzania, including government officials and permitting agencies at the national and regional level.

A summary of the current stakeholder analysis is provided below.

### 5.1. Affected Communities/Parties

Project Affected Communities/Parties have been classified into three distinct groups, who are each affected in different ways or to different degrees by the Project:

**Project Affected Persons (PAPs)**: Individuals and households affected by loss of physical and/or productive assets due to land acquisition and establishment of the Mine & Processing Area (also referred to as the RAP Area), Access Road and resettlement village are called Project Affected Persons (PAP’s). These are residents, land owners, land users, business owners and other members of the community who are eligible for compensation and/or other assistance as a result of physical and/or economic displacement.

**Directly Affected Communities (DACs)**: Are 1) those communities containing the land or assets that require economic or physical displacement or 2) due to their close proximity to the MPA, including the resettlement village, the new Access Road, and local roads are also considered to potentially be Directly Affected Communities. This would include neighbouring communities with the potential of being impacted by changes in dust levels, noise and vibrations, access to employment opportunities, accidents, influx of people and increase in pressure on the water resources, etc.

**Indirectly Affected Communities (IACs)**: Residents, businesses, government officials and administrators of the villages and Wards who may be indirectly affected by employment opportunities (including communities that might provide workers to the mine), influx and the related pressure on resources and services. Each of these communities are within approximately 30 km of the Project area at Epanko.
At this stage of the Project the potentially affected communities are those detailed in Table 5-1. The most affected subset of this group are those individuals/households physically and economically displaced by the Project (Project Affected Persons (PAPs)), then the residents in the villages directly affected by land acquisition and other impacts (Directly Affected Communities), followed by the other communities that could be indirectly affected by the Project or related activities (Indirectly Affected Communities).

Table 5-1 will be reviewed again following completion of the RAP.

Table 5-1 Affected Parties Stakeholder Groups

<table>
<thead>
<tr>
<th>Stakeholder Group/Persons:</th>
<th>Interest in Project or How Potentially Affected by Project:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Project Affected Persons (PAPs)</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Mine &amp; Processing (RAP Area):</strong></td>
<td>Individuals and households affected by loss of physical and/or productive assets due to land acquisition and establishment of the Mine and/or Access Road or resettlement village are called PAPs. These are residents, land owners, land users, business owners and other members of the community who are eligible for compensation and/or other assistance as a result of physical and/or economic displacement. This would also include any land owners/users or households affected by land access for the Resettlement Village site.</td>
</tr>
<tr>
<td>Households, landowners and business owners of Kazimoto/Epanko A/Itatira affected by land acquisition for the Mine.</td>
<td></td>
</tr>
<tr>
<td>Others who own or use land or own a business within the affected area but do not live in the listed hamlets.</td>
<td></td>
</tr>
<tr>
<td>Land owners/users and households directly affected by land access at the Resettlement Village (when confirmed).</td>
<td></td>
</tr>
<tr>
<td><strong>Access Road:</strong></td>
<td></td>
</tr>
<tr>
<td>Landowners of Nawenge/Kisewe/Mbagula villages (and other villages) affected by land acquisition for the Access Road.</td>
<td></td>
</tr>
<tr>
<td>Others who own or use land within the affected area but do not live in the listed villages.</td>
<td></td>
</tr>
<tr>
<td><strong>2. Directly Affected Communities (DACs)</strong></td>
<td>Are 1) those communities containing the land or assets that require economic or physical displacement (i.e. the PAPs) or 2) due to their close proximity to the proposed Mine, including the resettlement village, local roads and new access road are considered to potentially be Directly Affected Communities.</td>
</tr>
<tr>
<td><strong>Mine &amp; Processing (RAP Area):</strong></td>
<td></td>
</tr>
<tr>
<td>Communities containing PAPs (as above), plus:</td>
<td></td>
</tr>
<tr>
<td>Epanko Village: remaining hamlets of Itatira (i.e. households not physically displaced)/Mbera/Luli/Epanko B (see Figure 2-1).</td>
<td></td>
</tr>
<tr>
<td>Nawenge Ward (Nawenge, Kisewe and Sangu Sangu villages).</td>
<td></td>
</tr>
<tr>
<td>Vigoi ward (Mbagula and Makanga villages).</td>
<td></td>
</tr>
<tr>
<td>Resettlement Village Location.</td>
<td></td>
</tr>
<tr>
<td><strong>Access Road:</strong></td>
<td></td>
</tr>
<tr>
<td>Nawenge/Kisewe/Mbagula villages (and other villages identified during the land surveys).</td>
<td></td>
</tr>
<tr>
<td><strong>3. Indirectly Affected Communities (IACs)</strong></td>
<td>Residents, businesses, government officials and administrators of Mahenge and the Wards and villages who may be indirectly affected by employment opportunities, influx and the related pressure on resources and services. Reliance on Epanko for purchase of food products (banana and beans). Each of these communities are within approximately 6-30 km of the Project.</td>
</tr>
<tr>
<td>Mahenge, Msogezi, Mdindo and Isongo.</td>
<td></td>
</tr>
</tbody>
</table>

6 The SEP will be amended accordingly once the Resettlement Village location is confirmed.
Resettlement Working Group (RWG): Working in collaboration, TG, the Village and District level authorities and village representatives have established the Resettlement Working Group for the Project, a multi-stakeholder body that will guide the implementation of the land acquisition and resettlement programme for the Project (see Section 4.4). The RWG is assisting with the identification of PAPs and affected communities.

Vulnerable People and Groups

The Project recognises that vulnerable people require special consideration in the consultation process, as they may be unable to fully participate in mainstream consultation activities, and may also be disproportionately affected by some impacts, such as the loss of land.

Vulnerable or disadvantaged groups in the context of the Project may include, but will not be limited to:

- Women and women-headed households, due to cultural norms in Tanzania that limit their participation in decision-making, particularly in rural areas.
- Single-parent households.
- Youth in general, in particular, parentless children and child-headed households.
- People with a social stigmatism (i.e. albinism, fistula in women, people suffering from mental health issues).
- People with illness or disability and households with disabled members and those with illnesses.
- Elderly and infirm.
- Geographically remote households.
- Landless people including informal tenants.
- Family member’s otherwise dependent on family for housing and income.
- Households with a very low income and / or lack of food security (people in the local villages generally have very low incomes and practice subsistence agriculture).

TG will continue to define potentially vulnerable groups, and develop targeted consultation activities to ensure they are consulted on issues that affect them. The socio-economic survey of all households in the 6 hamlets of Epanko Village included questions on vulnerability and the process has been used to identify households with vulnerabilities. These individuals/households will be eligible for additional support if they are affected by physical and/or economic displacement due to the Project (as outlined in the Resettlement Policy Framework).

5.2. Other Interested Stakeholders

Other interested stakeholders are identified as groups that have the ability to influence the Project either as regulators or because they have special knowledge that can contribute to its design. This group includes National and Regional government, as well as regional and national NGOs, businesses, and other organisations.

Tanzanian Government Stakeholders

National government stakeholders include Ministries responsible for permitting and monitoring of the Project and other agencies that may provide support to Project development. Table 5-2 provides a summary list of key National and Regional level government related stakeholders and Table 5-3 local level government related stakeholders with an interest in the Project and that may be involved in the Project. Key areas of interest in or influence on the Project are also identified for each of these government stakeholders.
### Table 5-2 Key National and Regional Government Authority Stakeholders

<table>
<thead>
<tr>
<th>Authority</th>
<th>Interest in/Influence on the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>National</strong></td>
<td></td>
</tr>
<tr>
<td>Ministry of Energy and Minerals.</td>
<td>Energy use and production, mineral extraction.</td>
</tr>
<tr>
<td>Vice President’s Office (Division of Environment), within the Ministry of Natural Resources and Tourism. NEMC and Technical Advisory Committee (set up to review ESIAs).</td>
<td>Environmental management, prevention of pollution, permits, ESIA, biodiversity.</td>
</tr>
<tr>
<td>Ministry of Lands, Housing &amp; Human Settlements Development (MLHHSD), which includes the Chief Valuers Office.</td>
<td>Land disturbance permits and procedures, crop and grazing land and management. Specific roles of MLHHSD in relation to the RAP include: - Review and approval of the RAP; - Review and verification of the valuation process and compensation schedule through the Chief Government Valuer; and - Regulation and oversight of the land acquisition process including ensuring that compensation is paid or resettlement undertaken as agreed in the approval of the RAP.</td>
</tr>
<tr>
<td>Ministry of Transport and related Agencies (e.g. Tanzania Railways Ltd (TRL)).</td>
<td>Transport and logistics strategy and routes, traffic safety.</td>
</tr>
<tr>
<td>Ministry of Works and related Agencies (including Tanzania National Roads Agency (TanRoads) and TANESCO).</td>
<td>Impacts on the Tanzanian road network and any potential impacts to or use of national electrical facilities including during transport from and to Dar es Salaam.</td>
</tr>
<tr>
<td>Ministry of Water, Rufiji Water Basin Office.</td>
<td>Impacts on the water basin in general, including water use.</td>
</tr>
<tr>
<td>Ministry of Labour &amp; Employment.</td>
<td>Local employment and conditions, vulnerable people.</td>
</tr>
<tr>
<td>Ministry of Community Development, Gender &amp; Children.</td>
<td>Local and regional economic development, employment, vulnerable people.</td>
</tr>
<tr>
<td>Ministry of Education &amp; Vocational Training.</td>
<td>Skills and education of local people, employment.</td>
</tr>
<tr>
<td>Ministry of Finance.</td>
<td>Taxes, royalties.</td>
</tr>
<tr>
<td>Ministry of Natural Resources and Tourism, Tanzania Forest Services (TFS) Agency, including district and zonal level representatives.</td>
<td>Boundary of the forest areas, making sure no impacts on forest from the Project including from resettlement.</td>
</tr>
<tr>
<td><strong>Regional</strong></td>
<td></td>
</tr>
<tr>
<td>Regional Council (&amp; Regional Management Team), including the: Regional Commissioner; Regional Administrative Secretary (Assistant RAS dealing with Land); Regional Valuer; Regional Lawyer; and Regional Mining Officer (RMO).</td>
<td>Mineral and infrastructure development in region, influx/out-migration, employment, economic development. Land Acquisition – compensation and valuation of affected land and assets.</td>
</tr>
</tbody>
</table>
### Table 5-3 Key Local Government Stakeholders

<table>
<thead>
<tr>
<th>Specific Group/Persons</th>
<th>Interest in/Influence on the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>District Level: Ulanga District</strong></td>
<td></td>
</tr>
<tr>
<td>District Commissioner.</td>
<td>District Commissioner’s office is responsible for safety and security of people and properties in the District.</td>
</tr>
<tr>
<td>District Executive Director.</td>
<td>District Executive Director is responsible for all development activities in the District.</td>
</tr>
<tr>
<td>District Council.</td>
<td>District government oversees activities and administration in all Wards and villages.</td>
</tr>
<tr>
<td>District Officers (e.g. environment, land, agriculture, forestry, Cultural &amp; Traditions etc.).</td>
<td>District officials are on the Resettlement Working Group for the Project. Land and displacement issues, land use planning, employment, community health and community development are the key areas of interest.</td>
</tr>
<tr>
<td>District Water Department, Mahenge Township Water Authority and the Ulanga District Council Water Supply Authority.</td>
<td>Water use and water quality. Impacts on cultural sites and traditions.</td>
</tr>
<tr>
<td>Ward Level: Nawenge, Vigoi, Msogezi, Mdindo, Isongo</td>
<td>Ward government deals with day-to-day issues in villages. Ward officials are on the Resettlement Working Group for the Project. Wards are most interested in land, health, education, and environmental/forestry issues.</td>
</tr>
<tr>
<td>Ward Executive Officer.</td>
<td></td>
</tr>
<tr>
<td>Ward Council/Councillors.</td>
<td></td>
</tr>
<tr>
<td>Ward Officers (e.g. health, education, agriculture, etc.).</td>
<td></td>
</tr>
<tr>
<td>Village Level:</td>
<td></td>
</tr>
<tr>
<td>Nawenge Ward (Epanko, Nawenge, Kisewe and Sangu Sangu Village)</td>
<td>Village government manages village affairs including management of village resources incl. land, water, forests etc., conflicts and disputes, and maintain social order. Village officials from the hamlets within Epanko and hamlets in Nawenge/Kisewe/Mbagula villages affected by potential land acquisition are on the Resettlement Working Group for the Project. Villages are most interested in land and resettlement issues, employment and local economic development, water resources, cultural resources, influx and associated issues, and have high expectations of improved health, education and other infrastructure and services. Also, interested in effects on air quality, noise and vibration and biodiversity.</td>
</tr>
<tr>
<td>Vigoi Ward (Mbagula and Makanga villages)</td>
<td></td>
</tr>
<tr>
<td>Village Executive Officer.</td>
<td></td>
</tr>
<tr>
<td>Village Chairperson.</td>
<td></td>
</tr>
<tr>
<td>Village Council (&amp; Assembly).</td>
<td></td>
</tr>
<tr>
<td>Village Health Committee.</td>
<td></td>
</tr>
<tr>
<td>Hamlet Headman (Mwenyekiti).</td>
<td></td>
</tr>
<tr>
<td>Traditional Leaders (incl. the Mbui⁷)</td>
<td></td>
</tr>
</tbody>
</table>

### Non-Government Organisations (NGOs) and Other Civil Society Organisations

Other interested parties considered during the Project development related consultation include those who have the potential to influence the authorisation of the Project and assist in its delivery, such as NGOs, CBOs, media groups, businesses and so on. Initial identification of NGOs and CBOs was completed as part of the ESIA and has continued since. The existing local institutions and NGOs include CARITAS and Solidar Med, Primary Health Care Ulanga, local schools and the Diocese of Mahenge (Catholic Church) and Lutheran Church. There are also several agricultural based organisations including: Tanzania Fertilizer Company; Agriculture Seed Agency; Vista Tanzania, Mwanzo Bora, Cashewnutt Development

⁷ Mbui is the Kiswahili word for spiritual leader.
Fund Trust, MIVARF and the Ilonga research institute. Other interested non-governmental organisations may be identified as the resettlement planning and feasibility studies progress.

5.3. Ongoing Stakeholder Analysis, Tracking & Monitoring

Analysis of stakeholders will be ongoing in order to assess the best ways to engage with different groups, understand what information is important to them, and so on. TG will analyse its stakeholders by:

- Creating profiles of stakeholder groups to determine who and how much to engage.
- Identifying and verifying stakeholder representatives who can be relied upon to accurately communicate the results of engagement back to the people.
- Prioritising stakeholders based on the potential impacts of the Project on them, as well as their interests and influence on the Project.

At the current stages of the Project, the analysis of stakeholders is based upon available data and previous consultation. This will be reviewed following completion of the RAP.

A stakeholder engagement database and tracking system has been developed by TG and it incorporates mechanisms to log all meetings with stakeholders at national, regional and local levels and to track attitudes and perceptions of Project affected people and other stakeholders as the Project develops. The stakeholder tool is a spreadsheet. The Social Development Manager has overall responsibility for stakeholder tracking, supported by the CRO and two CLOs. This will include both engagement at a local and regional level as well as engagement at a national level, for example, meetings that might occur in or based out of the TG head office in Dar.
SEP - 6  Engagement Approach, Communications Methods & Information Disclosure

6.1. Overview of Stakeholder Engagement Approach

The Project is committed to a technically and culturally appropriate approach to information disclosure and stakeholder engagement. Since the beginning of the exploration activities and throughout the ESIA, the goal has been to ensure that adequate information is provided to local communities in which exploration activities are being conducted, and to ensure that relevant authorities are involved in the exploration permitting process. The ongoing stakeholder engagement programme will comprise three consecutive phases:

- **PHASE A:** Pre-construction & Resettlement Planning.
- **PHASE B:** Resettlement Implementation (*Phased Relocation Programme*).
- **PHASE C:** Construction & Operations Phase.

Phases B & C may overlap as the relocation programme will be phased and access may be taken to specific areas for construction where relocation has been completed and compensation paid. Further details will be provided in the detailed RAP.

The aims of TG’s approach the stakeholder engagement programme are summarised in Box 6-1.

**Box 6-1 TanzGraphite Stakeholder Engagement Programme Aims**

- Define the Project area of influence. Identify, map and assess Affected Parties and Other Interested Stakeholders, and how they may be affected by or interested in the Project.
- Identify stakeholder group representatives.
- Conduct stakeholder analysis to understand Project stakeholders and their patterns of interaction and groupings, so that appropriate methods and tools to engage them can be developed.
- Provide an action plan for consultation that allows for meaningful stakeholder input into the Project design phases (*Tables 7-1, 7-2 & 7-3*).
- Build long-term relationships between TG and the local communities.
- Ensure stakeholders have access to information on Project activities in a timely manner and that information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend.
- Ensure that vulnerable and disadvantaged groups (including women), are identified and that practical measures are implemented to include them in ongoing consultation.
- Establish clear mechanisms for managing stakeholders’ questions, concerns, and grievances and provide appropriate conflict resolution processes.
- Manage expectations among communities and other stakeholders.
- Document formal consultation and disclosure activities, define stakeholder tracking and records management system.

The TG stakeholder engagement programme is based on Informed Consultation and Participation⁸ with affected people, and designed to be fair and inclusive. Individual issues and concerns will be balanced with broader Project objectives; TG will seek to obtain *broad community support* for the Project.

The Company will aim to manage expectations by providing “consistent messages” and by explaining where uncertainties and unknowns exist in Project information.

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⁸ Informed Consultation and Participation (ICP) is a term used by the IFC in their Performance Standards.
6.2. Communication/Engagement Methods

Appropriate disclosure and engagement methods should correspond to the size and complexity of the Project and the social, cultural, and political setting. Table 6-1 shows the key methods and tools used and planned for the Epanko Graphite Project.

Table 6-1 Engagement and Disclosure Methods for Different Stakeholder Groups

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Proposed Engagement and Disclosure Methods</th>
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</table>
| Project Affected Persons; and Directly Affected Communities. | • Public meetings.  
• Resettlement Working Group and Sub-committees.  
• Small group meetings / focus groups, including those for vulnerable groups.  
• TG Mahenge and Epanko Village Offices & Hamlet Noticeboards.  
• Household surveys and household visits/individual meetings for vulnerable groups.  
• Local disclosure materials.  
• Third party support for affected people.  
• Ulanga Radio and local newspapers. |
| Indirectly Affected Communities.                   | • TG Mahenge and Epanko Village Offices (can be visited by members of any community).  
• Local and regional disclosure materials.  
• Some have representation on the RWG.  
• Ulanga Radio and local newspapers. |
• Resettlement Working Group and Sub-committees.  
• Written correspondence/formal progress reporting. |
| District / Ward / Village Authorities.             | • Individual meetings.  
• Resettlement Working Group and Sub-committees.  
• TG Mahenge and Epanko Village Offices.  
• Local and regional disclosure materials. |
| Community Based Organisations.                     | • Public meetings.  
• Resettlement Working Group and Sub-committees. Small group or individual meetings.  
• TG Mahenge and Epanko Village Offices.  
• Local and regional disclosure materials.  
• Ulanga Radio and local newspapers. |
| Businesses.                                        | • TG Dar es Salaam and Mahenge Offices.  
• Individual meetings. Pre-qualification processes.  
• Local and regional disclosure materials. |
| Project Employees.                                 | • Internal communications.  
• Individual discussions/briefings. |
| National/International NGOs.                       | • TG Dar es Salaam Office.  
• Individual meetings.  
• Newspaper, radio, website.  
• Local and regional disclosure materials. |
| General Public/Media.                              | • Newspapers, radio, website. Public meetings. |
| Financial Institutions.                            | • Individual meetings.  
• Disclosure materials, regular reports, website. |

Languages

In Tanzania the official languages are Kiswahili and English. There are also numerous local languages/dialects spoken throughout the country. In the communities in the Project area, the first language of majority of residents is Kipogoro, but
most also speak Kiswahili. It is important to note however, that it is only legal to publish documents in Kiswahili and English in Tanzania as both are classed as national languages. It is illegal to publish information in any of the local languages. Project documents will be prepared in English. TG will publish summary materials of key documents in Kiswahili and English for local villages, and where Kiswahili may not be widely spoken, the use of pictorial and/or verbal translation of materials will be performed.

Meetings

The RWG and other community meetings will be used to engage with broad groups on common issues. At this stage this is most likely to relate to the ongoing valuation process of land and assets in the mine RAP Area and along the proposed Access Road and engagement with other villages has generally progressed beyond this point to more tailored means of communication, including the hamlet feedback system for the RWG.

Public meetings will typically involve a range of activities such as presentations, poster displays, a question and answer period or roundtable discussions and dissemination of printed material. Records of attendees including disaggregated by gender will be collected for all public meetings. The NEMC also has the option to convene public meetings for certain activities and projects.

Resettlement Working Group & Hamlet Feedback System

As described previously, the RWG has been formed as a multi-stakeholder body that will guide the implementation of the land acquisition and resettlement programme for the Project. It will also be used as a general forum for community engagement. Representatives from the affected hamlets attend the RWG meetings and then feedback the key information from each meeting to their hamlets at community meetings. Should review of the proposed Access Road route indicate any additional communities could be affected by the Project, representatives from these communities will also be invited to the RWG meetings.

Small Group Meetings & Focus Groups

Small group meetings or village-based focus groups can be key methods used to engage local communities. The sub-committees of the RWG are performing a similar role in a number of ways, but it is still possible that additional small group meetings will be required. For example, to focus on specific segments of the community such as women, men, youth, and so on.

Household Surveys & Visits

Household visits have been utilised during the Household Socio-economic Survey for the land acquisition and resettlement programme. They will also be used when sensitive information needs to be shared or discussed with individual people or families, such as vulnerable people/families, or those being physically resettled. TG has focused on using local enumerators for land and asset surveys teams and will try to continue that approach as far as possible.

Third Party Support for Affected People

The Project intends to negotiate with those most affected by the Project, including those that will be physically and economically displaced, in a manner that allows them to actively participate in the planning process and on decisions that affect them. Experience with other projects in Tanzania (and elsewhere) has shown that without effective support, local communities cannot always understand the issues being discussed, nor their rights with respect to compensation or other such entitlements. As such, TG has provided funds to the Village for them to engage a third party legal advisor for the affected community councils to support them in this process, including helping to resolve any grievances and conflicts that may arise on the Project.

Epanko Community Relations Office & Officers

TG has established a community relations office in Epanko Village. This will serve as a general community liaison point but also as a Project Information Centre to disclose key documents, convey key messages, and allow stakeholders to obtain information about the Project. The Epanko office will be open regularly and will be staffed by a member of the TG Social Development team (e.g. local Community Relations or Liaison Officer). It will be a central repository for all relevant TG engagement materials and associated records. Noticeboards are also being established in each of the 6 hamlets of Epanko Village for disclosure of Project information.

The Social Development Manager also has an office at Mahenge and this office will also be used as a focal point for engagement as appropriate, along with the TG head office in Dar. Employees will also be TG’s ‘ambassadors’ within the local
community. Employees and consultants will be briefed regularly on the Project progress, and provided with approved messages and information they can describe if approached by members of the public during their fieldwork and other Project related activities.

6.3. Information Disclosure & Disclosure Materials

Mining Awareness Materials
Meaningful engagement can only be conducted with stakeholders who are informed about Project related activities and operations. In the area where the Project is located, there is little to no experience at the local level of particularly the early works associated with mining, such as exploration drilling versus mining itself, leading to perceptions that the mine might already be in operation when in fact only exploratory works are being conducted.

This means that stakeholders must be provided with a basic understanding of mining projects and the typical activities of such projects. This will build on the understanding that the communities gained of the type of activities and impacts and benefits associated with mining that they gained from stakeholder engagement conducted as part of the ESIA process. TG will provide information to PAPs to increase awareness of mining activities.

Notice Boards, Maps, Posters
Notice boards, maps, and posters and brochures will be used to disclose information to the RWG, stakeholders and PAPs. These tools will be available at the TG offices and used during stakeholder meetings and other public events.

Notice boards (with roofs for rain cover) will be constructed in each of the six hamlets of Epanko Village and an additional one in the school at Epanko to facilitate engagement, including providing updates on planning and project development. Notices with also be installed indicating the RAP boundary on each path entering the RAP boundary.

Leaflets and Brochures
An effective way to ensure consistent messages is to develop Project briefs/leaflets, with key information about the status of Project development and important milestones. In particular, short leaflets on certain topics such as the valuation methodology for land & assets and the entitlements matrix are planned to be developed and disseminated at the various venues and meetings. This material will be written in Kiswahili and English and sensitive to general education levels.

Website, Written Correspondence
These methods of communication will generally be more directed at potential national and international stakeholders. Written letters to individual households who are affected by the land acquisition are also being used to directly communicate key information. The updated ESIA, Resettlement Policy Framework, and ultimately the RAP, and SEP will also be disclosed on the TanzGraphite Website. These will be found at the following location: http://www.kibaranresources.com.au/tanzgraphite/social-and-environmental/.

The Company will set up a system for logging incoming letters and emails in Tanzania, directing them to the SDM for attention, documenting the Company’s responses and maintaining records. It will be Company policy to provide written responses or return phone calls within a defined period, wherever possible.

Local Media, Radio and Newspaper Articles
Information about the Project will continue to be advertised in local media. Short radio “spots” will be used to deliver key messages about topics of public interest such as consultation events, cut-off announcements, hiring for mine jobs. Representatives of the local radio, Ulanga radio, participate in the RWG and the station has been used every month or two for the Project to-date and more frequently to provide updates and notices for the resettlement planning.

Although newspapers are not as frequently used in the Project area or Mahenge, newspapers (e.g. the English language Daily News and Kiswahili Mtanzania), will be a useful form of communication for stakeholders based in Dar and express similar information to the radio spots. Locally the announcements for the Project from the District Commissioner have been published in Jambo Leo (Hello Today) and nationally in the Daily News. Occasional messages and Project news might also be broadcast on local or national television.
SEP - 7 Stakeholder Engagement Action Plan

A detailed Action Plan for Phase A: Pre-construction & Resettlement Planning and Phase B: Resettlement Implementation of the stakeholder engagement programme are provided below in Tables 7-1 & 7-2. Phase B will however have additional detail added as needed upon completion of the RAP. An outline Action Plan for Phase C: Construction & Operations is provided, which will be expanded upon in the next update of this SEP as an outcome of information gathered in Phases A and B.

Table 7-1 Stakeholder Engagement Action Plan - Phase A: Pre-Construction & Resettlement Planning

<table>
<thead>
<tr>
<th>ID</th>
<th>Purpose/Task &amp; Topic</th>
<th>Target Stakeholder Group</th>
<th>Actions &amp; Methods of Engagement</th>
<th>Schedule or Frequency</th>
<th>Responsible Parties</th>
</tr>
</thead>
</table>
| SEA-1| Introduction to the Project.                  | Affected Communities with Respect to the Access Road. | • Introduction meetings with local village leaders and Ward leaders if different. Invite of representatives of these communities to the RWG. Community feedback sessions to introduce the Project and anticipated main impacts of the Access Road, mitigation measures and next steps.  
   • Any subsequent individual meetings would be conducted as part of resettlement planning described below. | Q1/Q2 2017           | TG, RWG             |
| SEA-2| Mining Awareness Raising: Mining vs Drilling. | Ward/District Authorities.                   | • Resettlement Working Group – discuss best approach to raising awareness in the Affected Communities and raise awareness amongst this group at the same time.  
   • Use images to help visualisation of exploration drilling.  
   • Hamlet feedback system.  
   • Epanko Community Office: Used as a method to provide information for the topic, including images or other materials to help visualisation of exploration drilling. | [Ongoing since 2016]  | TG,RWG             |
|      |                                               | Affected Communities.                        |                                                                                                   | Q1/Q2 2017           | TG, RWG             |
| SEA-3| Updated ESIA & SEP.                           | International and National stakeholders      | • TanzGraphite Website disclosure.  
   • Hard copy available for viewing at the TG Head Office in Dar es Salaam. | Q1 2017              | TG                 |
|      |                                               | Ward/District/Regional Authorities           | • Make a short presentation of SEP document at the RWG.                                           | Q1 2017              | TG                 |
|      |                                               | Affected Communities                         | • Hamlet feedback system.  
   • One copy kept in TG Mahenge Office. | Q1 2017              | TG, RWG            |
| K    | Land Acquisition & Resettlement Planning, Including Negotiations for RWG Alternative Land Sub-committee. | RWG Alternative Land Sub-committee.           | • Identify the likely host communities and invite leaders to the RWG and plan for engagement with the host communities.  
   • RWG targeted presentation on the Village Planning and Project Brief for the Resettlement Site. Discussion should include the 'Technical, Environmental, Social, Economic and Stakeholder Acceptability' criteria that are proposed to analyse the resettlement site options and strategy. | Since Q4 2016. Q1 2017 Ongoing RWG | TG, RWG            |
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<th>ID</th>
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<th>Schedule or Frequency</th>
<th>Responsible Parties</th>
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</table>
|    | Compensation and Livelihood Restoration.  |                          | • Discuss sequencing of relocation and describe plan for RAP completion.  
• Solicit and record feedback/revise accordingly.  
• Specifically discuss any unique measures needed for vulnerable groups.  
• Meetings / briefings will be ongoing in accordance with the RWG 4-6 weekly schedule.                                                                                                                                                                                                     |                      |                    |
|    |                                           | RWG Alternative Roads    | • Identify the Affected Communities, invite leaders to the RWG and plan for engagement with their communities beyond the Project Introduction described above.  
• Describe plan for RAP completion regarding the Access Road.  
• Specifically discuss any unique measures needed for vulnerable groups.  
• Discuss TGs intention for road design, users post-construction and maintenance responsibilities.  
• Meetings / briefings will be ongoing in accordance with the RWG 4-6 weekly schedule.                                                                                                                                                      | Since Q4 2016        | TG, RWG |
|    |                                           | Sub-committee.           |                                                                 | Q1 2017 (Until Cultural sites surveys complete) | Ongoing RWG    |
|    |                                           |                          |                                                                 |                      |                    |
|    |                                           | RWG Traditions & Culture | • Focused presentation on the cultural resources that have been identified in ongoing surveys and plans to close any remaining gaps.  
• Agree a process to move and/or compensate for the graves and other cultural resources as appropriate, or where they are retained an agreement for access during Mine Life.  
• Enable the traditional leaders to inform the planning of the resettlement site as far as graveyard allocation & cultural considerations (certain traditions and blessings are already known to be important and are included in this plan).  
• Discuss sequencing of relocation and describe plan for RAP completion.  
• Throughout, demonstrate respect of the traditions and culture of the Village - this is considered key by TG.  
• Present the TG Cultural Heritage Management Plan when approved.                                                                                                                                                                                  |                      | TG, RWG |
|    |                                           | Sub-committee.           |                                                                 | Q1 2017              | Ongoing RWG    |
|    |                                           |                          |                                                                 |                      |                    |
|    |                                           | RWG Health & Environment | • Targeted presentation on the planning of the Resettlement Site, including Project Brief and Health Centre replacement facility.  
• Discuss sequencing of relocation and describe plan for RAP completion.  
• Targeted presentation on the ESMP, in particular the measures included for ongoing community health, safety and security and social development projects.  
• Solicit and record feedback/revise accordingly.  
• Specifically discuss any unique measures needed for vulnerable groups.  
• Meetings / briefings will be ongoing in accordance with the RWG 4-6 weekly schedule.                                                                                                                                                      | Q1 2017              | TG, RWG |
|    |                                           | Sub-committee.           |                                                                 |                      |                    |
|    |                                           | RWG Education Sub-       | • Targeted presentation on the planning of the Resettlement Site, in particular, those measures in place with respect to education (e.g. replacement school facilities).  
• Discuss sequencing of relocation and describe plan for RAP completion.                                                                                                                                                                                                                          | Q1 2017              | TG, RWG |
<p>|    |                                           | committee                |                                                                 |                      |                    |</p>
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<tr>
<th>ID</th>
<th>Purpose/Task &amp; Topic</th>
<th>Target Stakeholder Group</th>
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<th>Schedule or Frequency</th>
<th>Responsible Parties</th>
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<tr>
<td></td>
<td>SMP01: STAKEHOLDER ENGAGEMENT PLAN (SEP)</td>
<td>RWG Valuation &amp; Compensation Sub-committee</td>
<td>Presentation of the RPF for the Project (and ultimately the RAP). Discussions of valuation methodology and compensation options. Solicit and record feedback/revise accordingly. Prepare a summary leaflet on the valuation process, to be displayed on hamlet noticeboards. Specifically discuss the valuations/unit rates for physical and productive assets and Outline Entitlements Matrix and the best way to present these to the communities. Prepare a plan for negotiation and implementation of the RAP with PAPs. Establish &quot;Cut-Off Date&quot; with RWG. Present to the RWG the proposed procedure / announcements with respect to the cut-off procedure and gain feedback. Discuss sequencing of relocation and describe plan for RAP completion. Specifically discuss any unique measures needed for vulnerable groups.</td>
<td>Q1/Q2 2017 Ongoing</td>
<td>RWG, TG</td>
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<td></td>
<td>RWG Livelihood Restoration Sub-committee</td>
<td>Presentation of the RPF for the Project (and ultimately the RAP). Solicit and record feedback/revise accordingly. Specifically discuss the livelihood restoration measures and Outline Entitlements Matrix and the best way to present these to the communities. Prepare a plan for negotiation and implementation of the RAP with PAPs. Discuss sequencing of relocation and describe plan for livelihood restoration programme implementation in the RAP. Discuss local content and local labour options for the Project to maximise opportunities for local employment and skills development. Discuss the ways employment opportunities will be advertised and the associated recruitment process. Specifically discuss any unique measures needed for vulnerable groups.</td>
<td>Q1/Q2 2017 Ongoing</td>
<td>RWG, TG</td>
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<td>RWG Grievance Recording &amp; Disputes Resolution Sub-committee</td>
<td>Review the Project grievance mechanism (contained within this SEP), including agreeing how grievances are reported to and escalated to the RWG/sub-committee and recorded. Prepare a summary information of the process and how to lodge a dispute (English &amp; Kiswahili) for Affected Communities and share/present the summary leaflet at the RWG.</td>
<td>Q1 2017</td>
<td>RWG, TG</td>
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<td>ID</td>
<td>Purpose/Task &amp; Topic</td>
<td>Target Stakeholder Group</td>
<td>Actions &amp; Methods of Engagement</td>
<td>Schedule or Frequency</td>
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<td>National/Regional/District Authorities</td>
<td>• Specifically discuss any unique measures needed for vulnerable groups. • Specific meeting with the Chief Valuation Officer regarding the valuation process and steps to achieve the Final Valuation. This will supplement RWG discussions if it is felt that some additional time on the topic would provide additional comfort for TG and the authorities in ensuring a satisfactory process is undertaken. • Ongoing engagement with the District Land Officer and Town Planner regarding supporting preparation of the Village Plan for Epanko. • Coordination with TANROADS and TANESCO for permits and other planning to move equipment and goods from Dar es Salaam to site. Engagement with TANROADS regarding improvements to road corridor between Dar es Salaam and Mahenge. • Engagement with District on potential gazetting, shared use and maintenance of the mine Access Road. • Ongoing engagement with the Regional Mining Officer to identify mining or prospecting licence holders within the proposed resettlement site. • Engagement with District Medical Officer to obtain standard dispensary plan/Health Centre and to establish an understanding of existing district health programmes.</td>
<td>Q1 / Q2 2017</td>
<td>TG</td>
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<td>Project Affected Persons (PAPs): Physically and Economically Displaced People/Groups (Includes the resettlement host community and ASMs)</td>
<td>• Engage with the Village Council on alternative replacement land for the resettlement village. • Hamlet feedback system. • Prepare answers to Frequently Asked Questions (FAQs) on land acquisition and resettlement and ensure CRO &amp; CLOs can share these with PAPs, including during engagements in the TG Epanko community office. • A simple leaflet will be prepared on the valuation methodology and the outline entitlements matrix in the RPF and on the RAP process specific to the Project; this will be shared with PAPs and available / posted at the TG Epanko community office. • Ongoing socio-economic and land and asset household surveys to feed into the RAP. • Follow RPF/RAP procedure for announcement of the cut-off dates and comply with Tanzanian legal framework. • Periodic engagement with PAPs during resettlement planning and implementation via community meetings and small group meetings / Focus Group Discussions as needed (e.g. with women, men, farmers, artisanal miners, small businesses, or on specific topics such as compensation and livelihood restoration measures etc.). • Implement the measures from the Artisanal Miners Interface Management Plan (Two informal artisanal miners have been appointed by the artisanal miners to represent the group at the RWG).</td>
<td>Generally related to milestones in the RAP, with ad-hoc meetings as needed</td>
<td>TG, RWG</td>
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<td>Affected Communities</td>
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<tr>
<td>ID</td>
<td>Purpose/Task &amp; Topic</td>
<td>Target Stakeholder Group</td>
<td>Actions &amp; Methods of Engagement</td>
<td>Schedule or Frequency</td>
<td>Responsible Parties</td>
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<td>Additional needs will be discussed at RWG meetings and will also be based on needs identified by the SDM, CRO and CLOs as they go about their regular engagement with the community.</td>
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<td>TG</td>
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<td>Vulnerable People / Groups</td>
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<td>Separate consultation, as required, based on RWG meetings described above, detailed review of the household survey data as compiled in the RAP, and based on needs identified by the SDM, CRO and CLOs as they go about their regular engagement with the community.</td>
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<td>This could be in the form of individual or focus group meetings with vulnerable groups themselves or representatives of vulnerable groups/local CBOs working with vulnerable groups.</td>
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<td>As needed</td>
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<td>SEA-5</td>
<td>Grievance Management (All topics, pre-construction)</td>
<td>Affected Communities</td>
<td>Prepare a summary information/leaflet of the process and how to lodge a dispute (English &amp; Kiswahili). Disseminate summary leaflet: initially target PAPs, then roll out to all Affected Communities. Keep copies available at TG Epanko Office and available in the TG Mahenge office. As described in this SEP, maintain a booklet of forms for receipt of grievances in both the Epanko and Mahenge TG offices. Train TG staff on how to either receive a grievance directly or appropriately refer the grievance.</td>
<td>Forms available since Q3 2016 in TG office and Epanko Village Executive Office.</td>
<td>TG, RWG (Grievance Recording &amp; Disputes Resolution Sub-committee)</td>
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<td>SEA-6</td>
<td>Disclosure of RPF and RAP</td>
<td>International and National stakeholders</td>
<td>TanzGraphite Website. Hard copy available for viewing at the TG Head Office in Dar es Salaam and Kibaran Perth Office. Engagement with potential Project funders to demonstrate that land acquisition and RPF &amp; RAP meet legal and IFC PSS requirements.</td>
<td>Q1 (RPF), Q2 (RAP) 2017</td>
<td>TG</td>
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<td>Ward/District/Regional Authorities</td>
<td>Present each document at the RWG and discuss / confirm the best means to disseminate to the PAPs / Affected Communities. Of note several procedures will already have been determined with the RWG at this point such as the procedure for negotiations and procedure for communicating cut-off dates and will have been incorporated in the RPF and RAP. Prepare and disclose summary leaflet (in Kiswahili and English) of RPF and RAP (i.e. entitlements matrix and valuation methodology).</td>
<td>Q1 (RPF), Q2 (RAP) 2017</td>
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<td></td>
<td>PAPs / Affected Communities</td>
<td>Hamlet feedback system. Per the discussion with the Ward / District/Regional Authorities above. Prepare and disclose summary leaflet (in Kiswahili and English) of RPF and RAP (i.e. entitlements matrix and valuation methodology).</td>
<td>Q1 (RPF), Q2 (RAP) 2017</td>
</tr>
<tr>
<td>SEA-7</td>
<td>General schedule of site preparation and construction works</td>
<td>All stakeholders</td>
<td>Project schedule to be presented at the RWG. Hamlet feedback system for Affected Communities.</td>
<td>Project schedule updates shared</td>
<td>TG, RWG</td>
</tr>
</tbody>
</table>

**Notes:**
- **SEA-5**: Forms available since Q3 2016 in TG office and Epanko Village Executive Office.
- **SEA-6**: Engagement with potential Project funders to demonstrate that land acquisition and RPF & RAP meet legal and IFC PSS requirements.
- **SEA-7**: Stakeholder Engagement Plan (SEP)
### SMP01: STAKEHOLDER ENGAGEMENT PLAN (SEP)

**Table 7-2 Stakeholder Engagement Action Plan - Phase B: Resettlement Implementation (Phase Relocation Programme)**

<table>
<thead>
<tr>
<th>ID</th>
<th>Purpose/Task &amp; Topic</th>
<th>Target Stakeholder Group</th>
<th>Actions &amp; Methods of Engagement</th>
<th>Schedule or Frequency</th>
<th>Responsible Parties</th>
</tr>
</thead>
</table>
| SEB-1| Cultural Ceremonies                                                                   | Affected Communities                           | • The community **Leaving Ceremony** for the PAPs.  
  o This is a whole village ceremony to seek permission from the Ancestors that they are leaving the area and moving to a new location. The full village are invited, all traditional leaders, attendance from Government (District/Regional/National) and TG representatives. This starts on one day and runs through the night. Prayer rituals may then follow.  
  o **Timing:** Just prior to commencing construction of the resettlement village.  
  • The community ceremony for ‘Asking Ancestors for Protection for Relocating to the New Area’: This is a small ceremony when the first household moves to the resettlement site.  
  • **PAPs** (grave sites)  
  • A small ritual/ceremony will be performed prior to relocation of specific graves by the relevant family. TG will agree with Traditional Leaders/Elders a specific relocation procedure. | Just prior to commencing construction of the resettlement village.                      | Community, TG to provide provisions and attend.                                          |
| SEB-2| Land Acquisition & Resettlement Implementation, Including Negotiations for Compensation and Livelihood Restoration | RWG and its sub-committees                      | • Provide updates on the sequencing of resettlement actions and progress to-date. Engagement on phasing of the relocation of households to the resettlement village.  
  • Regularly discuss plans and needs for ongoing PAPs & Affected Communities engagement.  
  • At some point, perform a tour of the resettlement site: discuss plans for this and attendees (including PAPs).  
  • Include discussion of any lessons learned as activities are undertaken and how they might be incorporated in the programme going forward.  
  • Ongoing resolution of any grievances via the Grievance Recording & Resolution Sub-committee.  
  • Throughout, TG will demonstrate respect of the traditions and culture of the Village. | Ongoing RWG | TG, RWG |

(Actions for contract and employment opportunities are described in implementation below)
<table>
<thead>
<tr>
<th>ID</th>
<th>Purpose/Task &amp; Topic</th>
<th>Target Stakeholder Group</th>
<th>Actions &amp; Methods of Engagement</th>
<th>Schedule or Frequency</th>
<th>Responsible Parties</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>National/Regional/Disric/Ward/Village Authorities</td>
<td>• Meetings / briefings will be ongoing in accordance with the RWG schedule.</td>
<td>As needed</td>
<td>TG</td>
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<td></td>
<td></td>
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<td>• Ongoing meetings with the Chief Valuation Officer, as needed, to implement the programme.</td>
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<td></td>
<td>• Ongoing engagement with the District Land Officer and Town Planner, as needed, regarding implementing the Village Plan for Epanko.</td>
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<td></td>
<td>• Ongoing engagement with the Ministry of Lands, Housing &amp; Human Settlements Development, as needed, regarding registering land tenure for each household and potentially applying for certificates for housing.</td>
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<td>• Meetings and negotiations with the Village Council regarding the agreements for Community Land and Assets and items the Village Council have authority to agree upon on behalf of villagers.</td>
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<td></td>
<td></td>
<td>PAPs</td>
<td>• Hamlet feedback system. • Conduct individual meetings to present offers of compensation to PAPs and perform any appropriate negotiations per the PAP. Also, provide any update on RAP timelines in these meetings and a reminder of the Community Lawyer third party legal support and grievance mechanism available to PAPs. • Engagement on the phasing of the relocation of households to the resettlement village. • Periodic engagement with PAPs during resettlement implementation via small group meetings / Focus Group Discussions as needed (e.g. with women, men, farmers, artisanal miners, small businesses, or on specific topics such as compensation and livelihood restoration measures etc.). Timing to be focused around major milestones in the RAP implementation such as offers of compensation, proposals for livelihood restoration and once specific plans for resettlement of each party / village are known. These are to supplement individual meetings and so will primarily be used where it is apparent certain groups, such as women, would benefit from additional engagement to ensure the best implementation of the RAP. • At some point, engagements will likely include a tour of the resettlement village site. • Implement the measures from the Artisanal Miners Interface Management Plan • Epanko Community Office: Continues to function a general source of information on the Project and the resettlement process. • Engagement is expected to continue until at least the end of 2018, with an updated plan for engagement, specifically for post-implementation monitoring purposes continuing thereafter (this will be additional to actions described in Table 7-3 below).</td>
<td>Should generally be related to milestones in the RAP, with additional meetings as needed. Expected to continue until at least the end of 2018.</td>
<td>TG, RWG</td>
</tr>
<tr>
<td>ID</td>
<td>Purpose/Task &amp; Topic</td>
<td>Target Stakeholder Group</td>
<td>Actions &amp; Methods of Engagement</td>
<td>Schedule or Frequency</td>
<td>Responsible Parties</td>
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<td>Additional needs for engagement will be discussed at RWG meetings and will also be based on needs identified by the SDM, CRO and CLOs as they go about their regular engagement with the community.</td>
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<td>TG, RWG</td>
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<td></td>
<td>• Hamlet feedback system, including a reminder of how Affected Communities can access the Project grievance mechanism.</td>
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<td></td>
<td>• Engagement on phasing of the relocation of households to the resettlement village.</td>
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<td>• Epanko &amp; Mahenge TG Offices: Continues to function a general source of information on the Project and the resettlement process.</td>
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<td></td>
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<td></td>
<td>• Periodic engagement during resettlement implementation via FGDs as needed (e.g. with women, men, farmers, artisanal miners, small businesses etc.). These are to supplement the hamlet feedback system and so will primarily be used where it is apparent certain groups, such as women, would benefit from additional engagement to ensure the best implementation of the RAP.</td>
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<td></td>
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<td></td>
<td>• RAP implementation schedule to be posted on notice boards.</td>
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<td></td>
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<td></td>
<td>• Engagement is expected to continue until at least the end of 2018, with an updated plan for engagement, specifically for post-implementation monitoring purposes continuing thereafter (this will be additional to actions described in Table 7-3 below).</td>
<td>Should generally be related to milestones in the RAP, with additional meetings as needed. Expected to continue until at least the end of 2018.</td>
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<tr>
<td></td>
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<td></td>
<td>• Additional engagement needs will be discussed at RWG meetings and will also be based on needs identified by the SDM, CRO and CLOs as they go about their regular engagement with the community.</td>
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<td></td>
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<td>Affected Communities</td>
<td>• Separate consultation, as required, based on the RAP and based on needs identified by the SDM, CRO and CLOs as they go about their regular engagement with the community.</td>
<td>Should generally be related to milestones in the RAP. Expected to continue until at least the end of 2018.</td>
<td>TG</td>
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<td></td>
<td>• This could be in the form of individual or focus group meetings with vulnerable groups themselves or representatives of vulnerable groups/local CBOs working with vulnerable groups.</td>
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<td></td>
<td></td>
<td>Vulnerable People / Groups</td>
<td>• TanzGraphite Website.</td>
<td>Annually</td>
<td>TG</td>
</tr>
<tr>
<td>SEB-3</td>
<td>Annual Report Disclosure (Includes summary of Project progress against E&amp;S commitments)</td>
<td>International and National stakeholders</td>
<td>• Make a short presentation of the document at the RWG.</td>
<td>Annually</td>
<td>TG</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ward/District/Regional Authorities</td>
<td>• Make a short presentation of the document at the RWG.</td>
<td>Annually</td>
<td>TG</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Affected Communities</td>
<td>• Hamlet feedback system.</td>
<td>Annually</td>
<td>TG, RWG</td>
</tr>
</tbody>
</table>
### Table 7-3 Stakeholder Engagement Action Plan - Phase C: Construction and Operations

<table>
<thead>
<tr>
<th>ID</th>
<th>Purpose/Task &amp; Topic</th>
<th>Target Stakeholder Group</th>
<th>Actions &amp; Methods of Engagement</th>
<th>Schedule or Frequency</th>
<th>Responsible Parties</th>
</tr>
</thead>
</table>
| SEC-1 | Appointment of a Contractor for the project and ongoing procurements | Contractors / Suppliers Affected Communities | • Advertisements for employment and supplier opportunities on the TG website, local radio (major procurements), in national newspapers (major procurements), trade journals, at the RWG, hamlet feedback system (minor procurement), and via the community offices using notices on notice boards and word of mouth.  
• In all cases, describe the scope of work and recruitment / engagement process.  
• Supplier development programmes will also be considered. | Based on construction schedule | TG |
| SEC-2 | Construction and Commissioning Phase RWG (or whatever ongoing community forum has been agreed to at this stage) | RWG (or whatever ongoing community forum has been agreed to at this stage) | • Provide updates on the sequencing of construction activities and progress to-date.  
• Targeted presentation on the Environmental and Social Management Plan (ESMP) for construction and any social development programmes during this project phase, to include discussion of emergency planning and response.  
• Discuss plans and needs for ongoing community engagement.  
• Ongoing resolution of any grievances. | Ongoing RWG | TG, RWG |
| National, Regional, District, Ward & Village Authorities | | | • Coordination with TANROADS and TANESCO for permits and other planning to move equipment and goods from Dar es Salaam to site.  
• Ongoing engagement with the Ministry of Energy and Minerals and Ministry of Lands, Housing & Human Settlements Development.  
• Ongoing engagement with Ulanga District Council and District Commissioner and Morogoro Regional Council and Regional Commissioner regarding Project activities.  
• Annual environmental reports provided to NEMC.  
• Ongoing engagement with NEMC and provision of access to environmental and social monitoring data (in accordance with the ESMP).  
• Ongoing engagement with the Rufiji Basin Water Board Office.  
• Required engagement for emergency response planning, for example, with Ulanga District Council Security Head.  
• Ongoing engagement with Epanko Village Council and Nawenge Ward. | As required. | TG |
| Affected Communities | | | • Hamlet feedback system, including a reminder of how Affected Communities can access the Project grievance mechanism.  
• TG Epanko (construction) & Mahenge Offices to function a general source of information on the Project.  
• Construction schedule to be posted on notice boards.  
• Specific announcements to stakeholders detailing any disruption due to Project activities and updates to traffic management plans for construction. | Will generally be related to construction milestones, with additional meetings as needed | TG, RWG |
<table>
<thead>
<tr>
<th>ID</th>
<th>Purpose/Task &amp; Topic</th>
<th>Target Stakeholder Group</th>
<th>Actions &amp; Methods of Engagement</th>
<th>Schedule or Frequency</th>
<th>Responsible Parties</th>
</tr>
</thead>
</table>
| SEC-3      | Project operations                  | RWG (or whatever ongoing community forum has been agreed to at the point) | • Periodic engagement during resettlement implementation via FGDs as needed (e.g. with women, men, farmers, artisanal miners, small businesses etc.). These are to supplement the hamlet feedback system and so will primarily be used where it is apparent certain groups, such as women, would significantly benefit from additional engagement.  
• Additional needs will be discussed at RWG meetings and will also be based on needs identified by the SDM, CRO and CLOs as they go about their regular engagement with the community.  
• Separate consultation for vulnerable groups, as required, based on needs identified in previous phases and by the SDM, CRO and CLOs as they go about their regular engagement with the community.  |
|            |                                     |                                                      |                                                                                                                  | Ongoing RWG (or other community forum\(^9\)) | TG, RWG                              |
|            |                                     | National, Regional and District Authorities         | • Targeted presentation on the ESMP for operations and any social development programmes during this project phase, to include discussion of emergency planning and response.  
• Discuss plans and needs for ongoing community engagement.  
• Ongoing resolution of any grievances.  |
|            |                                     |                                                      |                                                                                                                  | As required – will be detailed in updated SEP prior to operations. | TG                                   |
|            |                                     | Affected Communities                                | • Coordination with TANROADS and TANESCO for permits and other planning to move equipment and goods from Dar es Salaam to site and product from site to Dar es Salaam.  
• Ongoing engagement with the Ministry of Energy and Minerals and Ministry of Lands, Housing & Human Settlements Development.  
• Ongoing engagement with Ulanga District Council and District Commissioner and Morogoro Regional Council and Regional Commissioner regarding Project activities.  
• Annual environmental reports provided to NEMC.  
• Ongoing engagement with NEMC and provision of access to environmental and social monitoring data (in accordance with the ESMP).  
• Ongoing engagement with the Rufiji Basin Water Board Office.  
• Preparation and submission of the Social Development Plan. (Also, referred to as the ‘Community Development Action Plan’) to the Ulanga District Council (once operations begin).  
• Required engagement for emergency response planning, for example, with Ulanga District Council Security Head.  |
|            |                                     |                                                      |                                                                                                                  |                       | TG                                   |

\(^9\) During operations once the relocation programme is completed the RWG may develop into a more appropriate engagement forum during operation of the mine.
<table>
<thead>
<tr>
<th>ID</th>
<th>Purpose/Task &amp; Topic</th>
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</tr>
</thead>
</table>
| SEC-3| Annual Report (includes summary of Project progress against environmental and social commitments) | International and National stakeholders | • Operational hours to be posted on notice boards.  
• Specific announcements to stakeholders when the mine goes into operations, using the TG website, notice boards and local media.  
• Periodic engagement during operations via FGDs as needed. These are to supplement the hamlet feedback system and so will primarily be used where it is apparent certain groups, would significantly benefit from additional engagement.  
• Additional needs will be discussed at community meetings and will also be based on needs identified by the SDM, CRO and CLOs as they go about their regular engagement with the community.  
• Separate consultation for vulnerable groups, as required, based on needs identified in previous phases and by the SDM, CRO and CLOs as they go about their regular engagement with the community.  
• Monitoring programme regarding the RAP implementation and post-implementation evaluation. |
|      |                                                          | Ward/District/Regional Authorities | Make a short presentation of the document at the RWG (or whatever ongoing community forum has been agreed to at this point). |
|      |                                                          | Affected Communities              | Hamlet feedback system or Project Community relations department engagement sessions with the community. |

<table>
<thead>
<tr>
<th>Schedule or Frequency</th>
<th>Responsible Parties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annually</td>
<td>TG</td>
</tr>
<tr>
<td>Annually</td>
<td>TG</td>
</tr>
<tr>
<td>Annually</td>
<td>TG, RWG (or other community forum).</td>
</tr>
</tbody>
</table>
SEP - 8  Roles & Responsibilities for Stakeholder Engagement

TG has established the resources for supporting the community relations and stakeholder engagement activities for the Project including establishment of a Social Development department that will manage day-to-day stakeholder engagement. Specialist guidance will be provided by national and international environmental and social (E&S) consultants, valuation teams and legal advisors. The Section below summarises the roles and responsibilities of the parties involved with respect to stakeholder engagement for the Project.

TanzGraphite Company Management

The company management team at TG has overall accountability for commitments made with respect to stakeholder engagement, and will continue to participate in community engagement events and ceremonies as appropriate, and lead engagement with Project funders. The management team have also established a Social Development department to support them in these efforts on a daily basis.

TG Social Development Manager & Community Liaison Officers

The Social Development department includes an experienced Social Development Manager, who has operational responsibility for implementing an effective community relations and stakeholder engagement programme. The team also includes a Community Relations Officer, and two (including one female) Community Liaison Officers, both hired from Epanko Village. The CRO and CLOs are a very important component of the community engagement programme and an office for the team has been established in Epanko Village so that the team can interact regularly with the community.

This team and the specialist consultants performing surveys and planning activities for the Project have been engaging closely with local communities, including community meetings, household visits, Resettlement Working Group meetings and meetings with the District & Regional Administration.

The team is responsible for the logging of all stakeholder engagement activities and grievances.

Resettlement Working Group

The committee is crucial for helping to implement the community engagement programme and in acting as a grassroots group that can actively engage with local people and receive their input and concerns. The RWG has been operational since Q2 2015 and will meet on an approximately 4-6 weekly basis throughout the duration of the land acquisition, resettlement and livelihood restoration planning and implementation process.

Details on the RWG are provided in Section 4.4 above.

National and International E&S Consultants

Tanzanian and international consultants have been contracted to conduct various social and environmental baseline and other studies related to the ESIA process and to support the resettlement and mine management planning. MTL led the ESIA process and continue to support TanzGraphite and Zyl Consulting in the development of the RPF and RAP. These organisations are involved in meeting local, regional and national stakeholders in conjunction with TG representatives. Zyl Consulting (ZC) is an international E&S and resettlement planning consultancy who are managing and providing oversight of the resettlement planning for the Project. ZC are also preparing the RPF, RAP and ESMP documentation.

TG also have procured the services of international engineering and technical consultancies to develop the feasibility study for the Project.

Land & Asset Valuation Team

Property Matrix Ltd (PML), a registered Tanzanian valuation company, have been engaged to undertake a survey of land and assets of affected households in the Project mine RAP Area and the Access Road. This will include community shared assets, graves and sites of cultural heritage importance. PML will also undertake required liaison with the Government Chief Valuer to achieve their necessary approval.

The Government Valuer will also be involved in discussions with PAPs to confirm their ownership of assets and entitlements / compensation, in responding to and resolving any PAP appeals on asset valuations and compensation,
and engagement with the RWG on asset confirmation, valuation and compensation. The Regional Government Valuer has also contributed to these engagements to ensure the community valuation protocols are being followed and to explain why it is important for households to participate in the surveys.

**Community Legal Advisors**

TG have provided funds to the Epanko Village Council to engage a legal advisor that will be available to the community members involved in resettlement activities. The community legal advisor provides advice to affected communities / individuals on their legal rights, land acquisition and resettlement legislation including fair, full and prompt compensation for affected land and assets and avenues for resolution of any grievances. The Community Legal Advisor was engaged during Q4 2016.
SEP - 9  Grievance Mechanism

9.1. Grievance Mechanism General Principles & Timescales

TanzGraphite (TG) recognise that consultation is an ongoing process and that concerns may arise as the Project undertakes further project planning, land acquisition and resettlement, construction and commences operations.

The grievance mechanism applies to all complaints related to the Epanko Graphite Project. This procedure has been developed to meet Tanzanian legal requirements relating to grievance resolution and international requirements for grievance management and is in line with IFC’s Environmental and Social Performance Standards. The grievance mechanism is comprised of the following steps. Figure 9-1 flowchart provides an overview of the process and Table 9-1 describes each step further:

- **Step 1 – Receive & Record Compliant.**
- **Step 2 – Review Complaint and Allocate Actions** (Complaint is screened to see if TG can handle the issue. Actions then may be allocated by TG to investigate and resolve grievance or refer matter to RWG (Grievance Recording & Dispute Resolution Sub-committee) for action and/or mediation. Escalation to the RWG may also occur if agreement cannot initially be reached on grievance resolution).
- **Step 3 – Notify Complainant of Proposed Resolution.**
- **Step 4 – Take Action and Update Complainant** (i.e. TG will undertake the proposed actions for resolution and update complainant when they are complete).
- **Step 5 – Escalate Complain** (if after 2 attempts at resolution and the complainant is not happy the matter will be escalated to the RWG (Grievance Recording & Dispute Resolution Sub-committee)).
- **Step 6 – Close Out & Lessons Learnt** (occurs when both TG and complainant happy with proposed solution).
- **Step 7 – Update Project Grievance Records** *(ongoing).*
- **Step 8 – Reporting** (reporting of grievances to TG management).

Each affected person, while conserving the possibility of recourse to Tanzanian justice at any time, will be able to appeal to this mechanism. The grievance mechanism does not constitute an obligation to find a solution to all grievances, it does however constitute an obligation to receive, register, treat, and document all grievances with due effort.

TG have a series of forms which are used for recording grievances and the actions taken (list below). These are available in English (contained in Annex A) and Kiswahili:

- Grievance Statement Form.
- Grievance Receipt Acknowledgement Form.
- Grievance Investigation Form.
- Grievance Investigation Outcome Form.

In the first instance the grievances are generally recorded using the Grievance Receipt Form (Annex A) and the log book in the TG Office at Epanko Village or in the log book with the Village Executive Officer *(TG have provided a set of forms to the Village Executive Officer to provide another channel for complainants)*, with information on the grievance and its resolution then maintained by the TG Social Development team.

Stakeholders can also register grievances at the TG office in Mahenge, with the Ward Executive Office and the District (who might enter it within their own system and investigate themselves or forward to TG), and direct to the RWG. Grievances can also be submitted by phone to the TG Social Development Manager (contact details are provided in SEP-11 below).

**Timescales to Address Grievances**

For each complaint registered:
• A written receipt will be made within seven (7) calendar days; and
• A proposal for resolution will be made within a maximum of thirty (30) calendar days thereafter. Subject to the
claimant’s acceptance of the proposed resolution, referral to the RWG Grievance Recording & Dispute Resolution
Sub-committee may be required following the initial proposal or the grievance might be forwarded to the RWG
straight away as described above.

There could be situations where a more urgent resolution is required, for example, if imminent, unplanned, damage
to property might occur and a solution is required as soon as possible. In this case, the Social Development Team
will treat the case as urgent and time will be considered to be of the essence, and specific timeline commitments decided
on a case by case basis.

Figure 9-1 Outline Flow Chart For Grievance Process ¹⁰

¹⁰ At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of
Tanzania.
9.2. Grievance Mechanism Steps

### Table 9-1 Outline of Grievance Mechanism Steps

<table>
<thead>
<tr>
<th>Steps</th>
<th>Description of Step.</th>
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</table>
| **Step 1: Receive & Record Complaint.** | • TG Social Development Manager (SDM) and Community Liaison Officers (CLOs) will be the focal point for receipt of complaints; however, stakeholders can also register grievances at the: TG office in Mahenge; Village Executive Officer (*who have been provided with forms and a log book by TG*); Ward Executive Office; Ulanga District; and RWG.  
  
  • Grievances can also be submitted by phone to the SDM (contact details are provided in SEP-11 below). All project staff will also be made aware of how to either receive a grievance directly for forwarding to the SDM/CLO or put members of the community in touch with CLOs to express their grievances. In each case, the complainant’s initial suggestions of how they would like to see grievances resolved and their preferences for ongoing communication with them will be discussed and recorded.  
  
  • Complaints will be recorded as soon as possible, using the **Grievance Statement Form** (Annex A) which is a carbon copy form, allowing records to be retained by the complainant also. Where grievance forms are not immediately available, efforts will be made to record the grievance as soon as practicable thereafter.  
  
  • For each complaint registered, a written receipt of complaint acknowledgement will be made within a maximum of seven (7) calendar days. This will be done using the **Grievance Receipt Acknowledgement Form** (Annex A). If information is already available at this point as to how it is being dealt with, by whom and an approximate estimate of how long the process might take, this will also be included in the acknowledgement also, otherwise this information will be provided within a maximum of 30 calendar days based on the proposals for resolution generated in Step 2 onward.  
  
  • Each grievance will be registered as an entry into the grievance log book with a unique reference number, supported by the full information on the **Grievance Receipt Acknowledgement Form** (Annex A). Some types of complaint might also need to have photos taken for claims about damage to property, livestock, environmental pollution etc.  
  
  • If a complainant wishes to raise a grievance anonymously, this would be achieved via the non-Company mechanisms described, which include access to the community lawyer with respect to resettlement and for land related matters the relevant institution (i.e. District Lands and Housing Tribunal, the Ward Tribunals and the Village Land Council). |
| **Step 2: Review and Allocate Actions.** | • Grievances will be reviewed and appropriate actions identified. If there is an obvious and immediate action not requiring TG Senior Management decisions or approval, the SDM will have the authority to propose and enact the grievance resolution. TG have established an internal grievance committee which will meet regularly to resolve all grievances which require Snr Management approval/decisions. This will include the SDM, the TG Country Manager and TG Finance Manager. TG might also decide a grievance is better dealt with by the RWG Grievance Recording & Disputes Resolution Sub-committee and forward it straight away as TG does not have the authority themselves to implement the solution. This could be the case for grievances such as land boundary disputes within the community.  
  
  • Following the first internal examination by TG, a resolution and actions proposed to the complainant (or the complaint is refused or considered to be inadmissible with reasons for this provided). As shown on the flow chart there are 4 main categories of action.  
    o Complaints which are not directly within TG’s responsibility and / or their authority to resolve, in which case they would be screened as such and referred directly to the RWG Sub-committee.  
    o Complaints/queries that have already been actioned, or for which no further action is needed other than to respond back to complainant.  
    o Complaints for which the action required is clear. |


<table>
<thead>
<tr>
<th>Steps.</th>
<th>Description of Step.</th>
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</thead>
</table>
| **Step 1:**Define the Grievance Procedure. | ○ Complaints which need further investigation by the TG internal grievance committee, and potentially other TG staff and external parties, in order to ascertain cause and appropriate action.  
  • Action to resolve grievances will be allocated to the most appropriate member of TG staff by the TG internal grievance committee unless the action can be immediately taken by the Social Development team without further approval. Overall responsibility for resolving the grievance will remain with the Social Development team in all cases. The **Grievance Investigation Form** (Annex A) will be the main document for recording the decision-making process within TG. |
| **Step 3:** Notify Complainant of Proposed Resolution. | • If it has not already occurred at this point, TG will then notify the complainant that the complaint has been received (this must happen within 7 days), how it is being dealt with, by whom and an approximate estimate of how long the process might take.  
  • This provision of a proposed resolution will happen within a maximum of 30 calendar days of receipt of the grievance. Notification will generally occur through a face to face meeting or a call from the TG Social Development team. |
| **Step 4:** Take Action and Update the Complainant Again. | • TG will then undertake proposed actions for resolution, and update the complainant once actions are completed. |
| **Step 5:** Escalate Complaint. | • If, after two attempts at resolution, the complainant is not happy with the proposed solution then the complainant may choose to escalate the issue externally. The proposed mediation mechanism is escalation to the RWG Grievance Recording & Dispute Resolution Sub-Committee which meets monthly. Although the Sub-committee was formed for resettlement activities, it is also used for general community liaison and has the appropriate members to review all Project-related grievances, including the District & Regional Legal Officers and the Epanko Project Community Lawyer.  
  • TG will prepare the technical information it can to support this process such as describing the grievances received, how previous grievances have been resolved, or possibly any visits required to individual’s homes etc. Any agreement reached will be confirmed by a protocol signed by the parties and the head of the RWG Sub-committee. |
| **Step 6:** Close Out and Lessons Learned. | • This occurs only when both TG and the complainant are both happy with the solution, it has been implemented and both parties have signed off. **Grievance Investigation Outcome Form** (Annex A) will be used to document this process.  
  • The TG internal grievance management committee will periodically perform an internal review to implement lessons learned with respect to specific grievances, and to identify any general trends in issues being raised, to take actions as necessary to try to prevent similar grievances being raised in the future. |
| **Step 7:** Update Project Grievance Records (Ongoing). | • As described in Step 1, the details of grievances will be held in the 4 forms included in Annex A, and will be maintained / stored by the TG Social Development team. This will include information on any outstanding actions. The forms will therefore be updated over time. |
| **Step 8:** Reporting. | • Information on grievances will be reported on a monthly basis to TG senior management as part of the Community Performance Report, including the total number of complaints, the major areas/causes of complaints, how many have been closed out etc. The report will be prepared by the Social Development team. |
SEP - 10  Stakeholder Engagement Management System: Management Measures, Monitoring & Reporting

10.1. Information Management

The results of all meetings, interviews and other engagement activities with stakeholders are recorded by TG. A Stakeholder Engagement Record will be used for this and the engagement will also be entered into the electronic, Excel-based, stakeholder engagement database. Details such as the date, the names of attendees and their affiliation (e.g., village, organisation) are included and any issues or questions raised are recorded, along with any commitments to follow-up action made by TG.

The RWG will also complete the following records and reports:

- Detailed minutes of any meetings held by the RWG or its sub-committees and any recommendations from the RWG will be recorded and made available to the public.
- Progress reports submitted to the relevant authorities and the management of the Company.

Where appropriate, all meeting records will be disclosed to the relevant stakeholder group for information or feedback.

Procedures will be in place to ensure that questions are addressed in a consistent fashion and that any unanswered questions are responded to as soon as possible.

10.2. Monitoring & Evaluation

The process of monitoring and evaluation of the stakeholder engagement programme by TG will aim to provide information such as whether:

- The activity is achieving the desired goals.
- The implementation conforms to the initial wider and specific goals.
- The implementation is progressing towards the expected results.
- The time frame is respected.

Monitoring and evaluation will be the responsibility of the Social Development Manager and will be reported to the TG management team in monthly reports (see below). Independent and external evaluation of the stakeholder engagement programme progress will also be considered by TG at appropriate times during Project implementation.

10.3. Reporting

Communities Performance Report

During the construction and operation of the mine, a monthly Communities Performance Report will be delivered to the management team by the Social Development Manager, and include results of stakeholder engagement. The national and international specialist consultants will contribute to this as necessary. The reports are likely to include:

- Disclosure materials disseminated: types, frequency, and location.
- Correspondence received by government or other stakeholders.
- Community and government consultation activities undertaken.
- Committees, groups and partnership activities related to engagement, including those of the RWG.
• Visitors to the company offices.
• Level of participation by different stakeholder groups (e.g. women).
• Comments from, and feedback provided to, stakeholders.
• Community attitudes and perceptions.
• Community grievances and their resolution.
• Whether the engagement is being conducted in line with the SEP.
• Commitments made to local communities by the Project.
• Community relations staff reports (e.g. their duties/activities, training and staff changes).

**External Reporting**

In addition to the ongoing stakeholder meetings described in SEP-6 and SEP-7, defined reports will also be required by certain stakeholders.

An Annual Monitoring Report may be required for international lenders and will be prepared for the Project by TG and their consultants.

Reporting to NEMC will be undertaken in accordance with the monitoring plan submitted to NEMC as part of the ESIA.

Ongoing reporting to the Ministry of Energy and Minerals as required by the Mining Licence.

TG will continue to determine the appropriate level of reporting to different groups as the Project development progresses, which will include requests for reporting resulting from the remaining engagement activities in Phases A and B.
SEP - 11 Contact Details for Stakeholder Engagement

Questions can be raised with the Social Development Manager (SDM), CRO and CLOs in person, as they will frequently be present in the local communities; however, questions can also be raised by any stakeholder by contacting the SDM as follows:

Contact Person: Bernard Mihayo, TanzGraphite Social Development Manager

Mahenge Office – TanzGraphite (TG) Ltd.
Uponera Street – Mahenge
Email: tanzgraphite@kibaranresources.com
Tel: +255 699 883 709

Dar es Salaam Office - TanzGraphite Ltd
Plot 30
Ndovu Street, Mikocheni B
Dar es Salaam
Email: tanzgraphite@kibaranresources.com
Telephone: +255 699 83 83 83

The SEP and other project documentation is disclosed on the TanzGraphite page of the Kibaran Resources Website: http://www.kibaranresources.com.au/tanzgraphite/social-and-environmental/
Annex A  TanzGraphite Grievance Mechanism Forms
GRIEVANCE STATEMENT FORM

Name of the Complainant: ________________________________
Address: ____________________________________________
Town/Village/Company: _________________________________
Cell phone number: ____________________________________
Gender: ______________________________________________
Age: __________________________________________________
Grievance Subject: _____________________________________
Grievance Reference number: ____________________________

Grievance statement
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

Complainant Signature: ________________________________ Tarehe: __________________
Name/Signature of the Community Relations Officer: ________________________________ Tarehe: __________________
Name/Signature of the Village Chairman /Executive Officer: __________________________ Tarehe: __________________
# GRIEVANCE RECEIPT ACKNOWLEDGEMENT FORM

This form is for acknowledging receipt of your grievance. TanzGraphite Community relations Office/Village Executive Officer commits that will inform you the investigation of your grievance within thirty days (30) from the receipt of your grievance.

<table>
<thead>
<tr>
<th><strong>Name of the Complainant:</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Address/House Number:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Town/Village:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Cell phone number:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Grievance Reference number:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Place where the Grievance received:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Name of the Community Relations Officer Who received the Grievance:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Signature:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Date:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Initial register date (in case this Grievance was previously registered through the Village Office):</strong></td>
<td></td>
</tr>
</tbody>
</table>
GRIEVANCE INVESTIGATION FORM

Name of the Complainant:

Address:

Town/Company:

Cellphone number:

Gender:

Age:

Grievance Subject:

Grievance Reference number:

Grievance Investigation details/Facts

Investigator Signature: Tarehe:

CR Officer Signature Community Relations Department: Tarehe:

Witness Name / Signature Tarehe:

Name/Village Chairman /Village Executive Officer Signature Tarehe:
GRIEVANCE INVESTIGATION OUTCOME FORM

Grievance Reference Number: ________________________________________________

Complainant Name: __________________________________________________________

Address: __________________________________________________________________

Town/Village: _________________________________________________________________

Cell phone number: ___________________________________________________________

Grievance Subject: _____________________________________________________________

Investigation Completion Date: _________________________________________________

Investigation details:

___________________________________________________________________________

___________________________________________________________________________

___________________________________________________________________________

___________________________________________________________________________

___________________________________________________________________________

___________________________________________________________________________

I agree that I have received the outcome of the Investigation

Signature: ___________________________ Name of the Complainant: __________________ Date: ______________

I agree that I have been informed with respect on the Investigation outcome of my Grievance. I accept the outcome and that I have no objection.

Sahihi: