

**KOSOVO RESOURCE COMPANY LLC  
PUBLIC CONSULTATION AND  
DISCLOSURE PLAN  
DRAZH NJA  
PODUJEVO MUNICIPALITY  
KOSOVO**

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**1.0 INTRODUCTION**

Lydian International Ltd (LI) recognises that potential social and environmental effects can be created through exploration and development of mining projects. Such effects may range from bad publicity reflecting perceived problems or issues due to lack of communication and stakeholder engagement, to actual and measurable environmental and social impacts resulting from poor design, construction, operation, or closure of specific exploration/mining developments around the world.

To ensure that proper and appropriate exploration developments occur in Kosovo, Kosovo Resource Company (KRC) as a subsidiary of LI endorses the concept that communication with project stakeholders is an essential component of any environmental and socio-economic assessment process.

KRC is committed to a pro-active and ongoing dialogue with all agencies, organisations, and individuals with an interest in development of the Drazhnja Project (Project). This Public Consultation and Disclosure Plan (PCDP), outlines and documents KRC's consultation and disclosure practices implemented for the Project. The PCDP includes details of public involvement activities which have already occurred and which are planned to take place later in the development life of the project:

- Before LI acquired the Drazhnja exploration licence;
- Activities subsequent to the acquisition of the licence;
- The initiation of exploration activities at the project
- During implementation of a public involvement program designed to collaborate with stakeholders
- During development of the Project
- Continuing throughout the life of the Project.

### 1.1 **OBJECTIVES OF THE PCDP**

The PCDP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goal of this Plan is to ensure adequate information is provided to project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their concerns and opinions that influence Project decisions. And that the approach gives recognition to and is carried out in a manner consistent with local cultural norms of the area and of Kosovo as a whole.

The PCDP is a useful tool for managing communications between KRC and stakeholders. The PCDP should help to facilitate and streamline decision making whilst fostering an atmosphere of understanding that actively involves individuals, groups, and organizations that can affect, or be affected by, development of the Project.

The Plan is intended to document implementation of a formal program in an objective, transparent manner to focus efforts on improving communications between KRC and other interested parties. Monitoring and evaluation of program results and behaviour of the respective parties will enable evolution and improvements to the program over time.

The Key Objectives of the PCDP may be summarised as follows:

- To keep stakeholders informed of KRC activities;
- To generate and document broad community support for the Project;

- To improve communications between interested parties;
- To document development of formal public consultation; and Establish formal complaint submittal / resolution mechanisms

Key aspects of the consultation and disclosure process include:

- Regular release of Project-related information in a manner consistent with Lydian's Public Consultation and Disclosure Strategy (PCDS), including LI corporate Environmental Policy, Social Responsibility Policy and Labour Policy, KRC project development details, answers to frequently asked questions, and rights and responsibilities of affected people presented as required in a manner consistent with local cultural norms of the area and of Kosovo;
- Articulation and delivery of clear, consistent messages from key staff to stakeholders and the public,
- ensuring that community workers are aware of KRC's position regarding the Project and are capable of responding to questions/comments appropriately;
- Consultation is undertaken in both Albanian and English;
- Regular meetings and forums are documented by KRC community workers to present Project-related information, answer questions, and assuage concerns;
- Identification of multi-stakeholder committees, including a Chairperson acceptable to all parties to discuss and make decisions regarding Project impacts and community concerns;
- Maintenance of an open-door policy for community workers, such that stakeholders feel comfortable approaching them directly to ask questions and raise concerns;
- Creation of a responsive management system for recording and responding to comments and concerns.

## 1.2 **PROJECT HISTORY**

### Exploration and mining history

It is probable that the earliest exploration and mining activities at Drazhnja occurred during the Roman occupation of the area. This continued to varying degrees over subsequent centuries. There are numerous prospecting pits, shallow trench excavations and minor underground development throughout

the area. These exploration and possibly exploitation activities are thought to be contemporaneous to the mining activities at Novo Brdo which is approximately 50km to the south which would imply that they date from the early middle ages.

There were 3 well documented phases of exploration activity in the 20<sup>th</sup> Century prior to the arrival of KRC:

- 1927 – 1940. Exploration and trial mining activities carried out a British company, “Trepča Mines Limited” including the excavation of four adits and several vertical shafts and ventilation holes. Exploration work tailed off in the 1930’s as the company turned its’ attention to the newly discovered deposits at Stari Trg and the commencement of the Second World War effectively ended its involvement in the area.
- 1953 – 1956. Exploration activities completed by the Geological Department of “Trepca”
- 1973 – 1988. Exploration and metallurgical investigations carried out by the Trepca Institute of Geology including geological, geochemical, geophysical research, deep drilling and mining works.

KRC applied for an exploration Licence which was granted in June 2006. Since then the project has been mapped, grab samples, soil sampling, trenching and exploration drilling has been carried out. Work is currently underway to open up the collapsed adits relating to the abandoned exploration work referred to above.

### **1.3 PROJECT DESCRIPTION**

Draznja is a Lead-Zinc-Silver prospect located in the Municipality of Podujevo, approximately 45 km from the capital city, Pristina. The project is situated on the edge of an elevated region with average heights of around 750m ASL. The area alternates between cultivated smallholdings and large tracts of woodland consisting of a variety of broad leaf trees, primarily oak, beech and maple.

Podujevë/Podujevo municipality is located north of Prishtinë/Pristina. It covers 663 km and is comprised of 78 villages, including the town of Podujevo. The current population of the municipality is approximately 130,000 (about 99% Kosovo Albanian), including the approximate 35,000 inhabitants of Podujevë/Podujevo town. It is estimated that the number of Kosovo Serbs in the municipality used to be around 1,650, of which half were in Podujevë/Podujevo town. The only two elderly Kosovo Serbs

living in Podujevë/Podujevo town after the 1999 conflict left in the beginning of 2001, while 21 Kosovo Serbs ( 8 families) live in a small enclave, Sekirača/Sekiraçë, a quarter of Metergoc/Medregovac village near the border with Serbia proper under Kosovo Force (KFOR) and KPS regular patrols. Podujevë/Podujevo is home to both a Roma and Ashkali community, which are located in the main town and its surrounding areas. According to local Ashkali representatives, there has been no discrimination directed toward them and it considers itself an integral part of the existing Kosovo Albanian population of Podujevë/Podujevo municipality.

Underground development at the site consists of over 5,000m of adits and raises. From 1973 till the early 80's a programme of significant underground exploration development was commissioned. Initially the old St. Barbara adit was enlarged so as to accommodate a narrow gauge rail system. Additional cross-cuts and extensions were made in the late seventies and eighties to enable access to the high grade ore encountered in drill holes DB\_77-21 and DB\_82-10. Approximately 3,200m of exploration tunnels were completed on the 695m level and a further 1,800m on the 745m level, (figures 7.9 – 7.13).

Additional underground development included two underground drilling chambers in the 695m level along, two ventilation raises to the surface and an exploration/ventilation raise between the two levels.

Sampling of the adit walls was completed on both levels, figures 7.14 – 7.15. A channel approximately 10cm x 5cm was chiselled along zones of interest and samples collected on a metre by metre basis. Analytical procedures are not available but an appraisal of results indicates the silver assay technique had an upper detection limit of 100g/t. Pb and Zn assay techniques or the laboratory which completed the testing is not available.

Several resource and reserve estimation studies were completed over the Draznja deposit during the 70's and 80's. Ore bodies were identified and individual resources estimated using a sectional method.

Current activity at the site includes a programme of diamond drilling to prove the Yugoslav resource figures and intensive work to open up the collapsed adits in order to carry out further underground exploration.

## **2.0 PREVIOUS PUBLIC CONSULTATION AND DISCLOSURE EFFORTS**

KRC is not aware of any previous public consultation or disclosure efforts made under the Yugoslav communist regime and subsequently under the management of Trepca. It is clear that local sensibilities and concerns were largely disregarded (is this last sentence needed?).

Since being awarded the licence, KRC has implemented a series of meetings with the local municipal authorities, interested parties and landowners as part of its commitment to best practice.

## **3.0 REGULATIONS AND REQUIREMENTS**

Since 1999 Kosovo has been under UN administration through the United Nations Mission in Kosovo (UNMIK). The law governing mining and exploration in Kosovo is UN Regulation 2005/3 on Mines and Minerals in Kosovo which is regulated by the Independent Commission for Mines and Minerals (ICMM). Specific guidelines and requirements outlining a public participation process to address potential environmental and socio-economic impacts from exploration development are not defined. To this end, KRC has developed a Public Consultation and Disclosure Plan to address potential issues that is culturally sensitive, transparent, provides timely, accurate information to Project-affected people and other stakeholders, and allows sufficient opportunity for stakeholder input.

### **3.1 ENVIRONMENTAL REGULATIONS KOSOVO**

An Environmental Impact Assessment (EIA) and the requirement for Environmental Bond is a prerequisite for the granting of a Permit for Special Operations. KRC was granted a waiver by the ICMM for the conduct of early stage exploration activities. Articles 18 – 23 of UNMIK Regulation 2003/9 on the Promulgation of the Law adopted by the Assembly of Kosovo on Environmental Protection, detail the regulations regarding protection of the environment during exploration and mining activities as promulgated in the Environmental Protection Law 2002/8 of the Provisional Institutions of Self-Government of Kosovo.

### **3.2 WORLD BANK GROUP/IFC STANDARDS AND GUIDELINES**

The International Finance Corporation (IFC) has embedded its requirements regarding community engagement, public consultation and local disclosure in the recently approved (April 2006) Performance Standards (PS). The PS are designed to ensure that projects in which IFC invests are implemented in an environmental and socially responsible manner. KRC has, wherever possible, followed the appropriate PS and has reviewed IFC procedures and guidance documents when developing this PCDP.

KRC is committed to undertake the following:

- During the Social and Environmental Assessment - Environmental Impact Assessment (SEA/EIA) process, KRC should conduct consultations with affected groups, non-governmental organizations (NGOs), local authorities, and other interested parties about environmental and socio-economic aspects of the project, and consider stakeholders' views. Consultation should start as early as possible with information made available in advance. The project sponsor should consult stakeholders at least once during scoping and before the Terms of Reference for the SEA/EIA are finalized and once a draft is prepared. In addition, KRC should consult with such groups throughout project implementation, as necessary, to address SEA/EIA related issues that affect them.

- Consultations to be undertaken by KRC during construction and operation of the Project should be incorporated into the Public Consultation and Disclosure Plan.
- For the initial consultation KRC should provide summaries of project objectives, descriptions, and potential impacts. When the draft SEA/EIA is ready KRC should present findings of the SEA/EIA to the public. In both cases, the information should be disseminated among the relevant stakeholders proactively, and in the local language. After consultations have been held, KRC adds details to the SEA/EIA report of the consultation conducted, and discusses measures on how public comments will be incorporated into project design and implementation.
- The draft SEA/EIA report should be made readily available to the public in public places, and should contain responses to public consultation process. A non-technical summary of the document should be made available in the local language to local stakeholders. The report is made available to a wider public through IFC's internet InfoShop website.
- Public consultation is an ongoing process and should continue throughout project design, construction, commissioning and operational phases.
- IFC requirements on best practice in public consultation and disclosure outline issues to consider while undertaking public consultation and disclosure, as follows:
  1. Written and oral communication in local languages and readily understandable formats;
  2. Accessibility by relevant stakeholders to both written information and to the consultation process;
  3. Use of oral or visual methods to explain information to non-literate people;
  4. Respect for local traditions or discussion, reflection and decision-making;
  5. Care in assuring groups being consulted are representative, with adequate representation of women, vulnerable groups, ethnic or religious minorities, and separate meetings for various groups, where necessary;
  6. Clear mechanisms to respond to people's concerns, suggestions and grievances.

### **3.3 INTERNATIONAL BEST PRACTICE**

LI, whilst not a member of the International Council on Mining and Metals (ICMM), aspires to membership and follows best practice guidelines as promulgated by the ICMM. As such, the Drazhnja Project will follow the ICMM's principles for sustainable development throughout the life of the Project. The ICMM Principles include:

- Implement and maintain ethical business practices and sound systems of corporate governance;
- Integrate sustainable development considerations within the corporate decision-making process;
- Uphold fundamental human rights and respect cultures, customs and values in dealing with employees and others who are affected by our activities;
- Implement risk management strategies based on valid data and sound science;
- Seek continued improvement of environmental, health, and safety performance;
- Contribute to conservation of biodiversity and integrated approaches to land use planning;
- Facilitate and encourage responsible product design, use, re-use, recycling and disposal of products;
- Contribute to social, economic and institutional development of communities in which we operate;
- Implement effective and transparent engagement, communication, and independently verified reporting arrangements with stakeholders.

### **3.4 LI CORPORATE POLICIES**

KRC, in keeping with LI's corporate philosophy, is designing and operating the Drazhnja Project to be a model corporate citizen in terms of recognition of social and environmental concerns in communities where the Project may have an effect.

LI Corporate Social Responsibility Policy KRC, as a subsidiary of Lydian Resource Company Ltd Corporation, will develop and operate the Drazhnja Project under the LRC Corporate Social Responsibility Policy which includes management systems and discipline specific standards on Community and External Relations (LI 2003).

LI believes public consultation and collaboration are vital components of its Social Responsibility Policy. The Company, through its management and Board of Directors, is actively and continually seeking stakeholder involvement in its deliberations not only to improve decision-making and build understanding, but also ensure long-term project viability and benefit enhancement to Project-affected people and other relevant stakeholder groups.

LI's Social Responsibility Policy addresses the following points:

- Goals Regarding Engaging Stakeholders
- Demand leadership from all employees;
- Seek to share success by partnering with stakeholders in appropriate community development programs;
- Consult stakeholders in matters that affect them;
- Strive to communicate performance in an accurate, transparent and timely manner;
- Understand that the actions and conduct of every LI employee and contractor are the basis on which stakeholders will evaluate LI's commitment to achieving the highest standards of social responsibility;
- Carry out our Social Responsibility Policy in accordance with LI's Environment and Health and Safety Policies since environmental, health and safety issues can affect the communities where we operate.

#### **4.0 PUBLIC CONSULTATION AND DISCLOSURE PLAN**

KRC established a local community consultation programme in Kosovo in January 2007, which includes a number of stakeholder consultation and disclosure activities. The objectives of the Communications Plan include:

- Develop a process to ensure that KRC has timely access to information and identification of communications support required for various activities.
- Identify KRC external stakeholders, their issues and information needs.
- Develop appropriate and consistent key messages in support of KRC values and activities.
- Appoint relevant communicators to communicate KRC key messages.
- Develop communication support material for KRC key messages.

- Work to develop appropriate corporate social responsibility policy initiatives.
- Establish and maintain cordial relations with all stakeholders including government, media, traditional authorities, local communities, and the general public as well as employees.
- Develop a crises communication manual relevant to KRC.
- Train relevant personnel in crises communications
- Project stakeholders – individuals, groups, and organisations with a legitimate interest in the Project, as listed in Attachment 2, have been actively engaged in the consultation process to provide opportunities to actively contribute toward development of the Project.

#### 4.1 **RESOURCES AND RESPONSIBILITIES**

KRC has overall responsibility for stakeholder consultation and involvement program. These responsibilities include:

- Responding to the concerns and issues expressed during public consultations
- Allocating sufficient funds to implement a viable PCDP
- Ensuring that all public consultation and information disclosed is documented.
- KRC's engagement strategy is supported through community education activities, including school visits, formal and informal stakeholder engagement exercises, development and initiation of an issues log, stakeholder engagement register, contact reports and feedback systems, as listed below. These approaches allowed KRC to consistently track issues of concern among community constituents.
- Proposals for enhancing internal communications systems providing employees with consistent key messages, speaking points, Frequently Asked Questions on various issues related to the Project are being developed.
- An understanding of the economic/political/socio-cultural context in which KRC proposes to communicate has informed the structure of various public meetings facilitated.
- Monthly newsletters in English and Albanian with photographs of activity at the site are produced and distributed to each household immediately affected by exploration activities.

## 4.2 SUMMARY OF ISSUES

Several primary issues have been identified that relate to the Drazhnja Project. These issues and the manner in which KRC has addressed them are summarised below.

### Social and Economic Effects

Approximately 90 percent of households are engaged in small scale subsistence farming as their primary livelihood activity prior to exploration commencing in 2006. Many of the older males had worked at the project for the previous operators but had not had any employment since 1988. Only a small minority have any steady income. Due to the Kosovar Albanian family/clan system, many of the young men still live with the head of the family which leads to large, extended households. KRC actively seeks to provide employment for one adult male in each household in an attempt to spread prosperity in an equitable fashion.

### Managing Expectations

A significant challenge has been differentiating between an exploration project and a producing mine and managing unrealistic expectations. This has been done through public meetings, staff briefings and the company newsletters. The management of KRC have been consistently "on message" to ensure that expectations remain realistic.

### Biodiversity and Forest Reserves

Biodiversity is a measure of the variety of life, and its processes; including the variety of living organisms, genetic differences among them, and the communities and ecosystems in which they occur (Langner and Flather 1994). Biodiversity is often interpreted as a measure of biological complexity and variation within the Study area. KRC recognizes that the activities of exploring and developing resources may have an impact on biodiversity. Likewise companies engaged in exploration and resource development can be a positive force for biodiversity conservation. Through sound environmental management many potential impacts to biodiversity from exploration and development can be avoided or mitigated. KRC is committed to work in effective business-NGO-government partnerships focused on biodiversity conservation in the Project area. This is being achieved by actively seeking approval from the Kosovar forestry board who are a major landowner in the area.

Potential impacts on the Forest Reserves include the creation of access into the reserves via new roads, power line access routes. Until now this has been mitigated by improving existing access routes wherever possible and using them rather than building new access routes for drill rigs. KRC proposes to

employ an independent consulting company to address the potential impacts of exploration activities in the area.

#### **4.3 INFORMATION DISCLOSED**

KRC used a variety of communication techniques to announce major Project milestones and decision points and has adopted a community-centred approach where the Company not only tries to gain the support of the stakeholders for the Project, but also involves stakeholders in making sure the project develops for the benefit of everyone. For instance, in responding to concerns expressed by stakeholders over the potential damage to access roads by carrying out a programme of road repairs to the existing infrastructure.

KRC has also been active in establishing links with the community, business, and schools; forming a community liaison committee; information contact points; displays; invited comments; public meetings; community demonstration projects; These techniques are tailored to suit individual stakeholder concerns..

#### **4.4 REPORTING**

The PCDP is an appendix to the Sustainable Development Policy Statement (SDPS), which will be submitted to the IFC.

Ongoing public consultation, meeting minutes, and reports will be submitted within seven days to the KRC Drazhnja General Manager. KRC will maintain an active file regarding all public consultation and disclosure documentation collected throughout the program, which are available for public review on request

The KRC General Manager of the Drazhnja Project will compile and submit a report summarizing PCDP results to IFC annually. The report will provide a summary of all public consultation issues, grievances, and resolutions. The report will also provide a summary of relevant public consultation findings from informal meetings held at the community level.

#### **4.5 IDENTIFICATION OF STAKEHOLDERS**

The Drazhnja South Project has a number of stakeholders, people, agencies, or organisations that could be directly or indirectly affected (positively or negatively) by the Project or that could influence the Project (positively or negatively). In order to develop an effective stakeholder involvement program, it is necessary to identify the various stakeholder groups as different outreach methods may be required for different groups. In addition, primary concerns will likely vary between respective stakeholder groups.

KRC introduced the concept that stakeholder groups should elect individuals as their representatives to assure stakeholders of a consultative and

collaborative approach to conflict resolution free from coercion and based on informed consent.

A list of stakeholders identified for the Drazhnja South Project is contained in Attachment 2. Major stakeholder groups are summarised below.

- Government Agencies such as ICMM, the Ministry of Energy and Mines, the Ministry of the Environment.
- The office of the President of Podujevo Municipality.
- Surface rights holders.
- The Kosovo Trust Agency (KTA)
- Approximately 350 people live in the immediate vicinity of the project mainly in individual farms, approximately 50 of them will be directly affected by the project.
- USAID who are active in the area.
- KRC are actively seeking engagement with other NGOs who are operating in the area.

#### 4.6 **COMPLAINT PROCESS**

To meet its policy objectives, KRC maintains both informal and formal grievance mechanisms. KRC management attempt to answer questions and address issues during formal and informal stakeholder consultations; if they are able to do so, documentation is not recorded. If a stakeholder raises an issue that requires follow-up, that stakeholder's contact information and question/issue is documented and addressed by the Country Manager, according to the complaint process described below.

A Complaint Register Form on which are recorded all complaints received is maintained solely for local residents who come to the project site at Drazhnja. Complaints are dealt with in a timely fashion, either verbally or through means of a written response as soon as possible. KRC staff routinely seeks advice and, where appropriate, intervention of traditional authorities to assist in resolving disputes. Traditional authorities possess considerable institutional relevance, particularly at the rural level where traditional status continues to command respect.

Where there is a requirement to issue a written response to a complaint a written or verbal invitation is given to the complainant to visit the office and have his complaint addressed and a written response is handed over. Requests for help are not considered complaints. From June 2006 to March 2009 only three complaints have been received and all relate to perceived

unfairness in work allocation. All complainants were given a verbal response by the site manager.

#### **4.6.1 Summary of the Complaint Process**

- STEP 1: Receive the complaint letter and put the date of receipt on it
- STEP 2: Enter the complaint in a Complaint Database
- 
- STEP 3: Acknowledge receipt of each complaint in writing to each person. This is done as soon as complaints are received.
- STEP 4: Where complaint relates to compensation dispute, notify the bank to withhold payments on all disputed compensation until parties resolve the dispute and notify KRC accordingly.
- STEP 5: File all original complaint letters chronologically by month.
- STEP 6: Complaint letters with specific issues are photocopied and forwarded to persons responsible to comment or resolve the case/issue.
- STEP 7: All resolved cases are documented and filed in a separate file

#### **4.6.2 Grievance Mechanism**

KRC will maintain an informal grievance mechanism for resettlement and compensation issues should they arise. The public may express concerns and issues at the Project Office in Draznja or to the management during normal daily activities. Informal grievances are treated as complaints and are resolved according to the Complaint Process previously described. A grievance is considered to be more serious as it might involve resettlement and compensation issues that could result in legal action and are addressed using the formal grievance process.

KRC established a formal grievance mechanism to address actual, measurable concerns relating to the resettlement and compensation process which is described as follows:

1. First order mechanism is a face-to-face discussion with appropriate KRC personnel. Most grievances are heard and resolved in the presence of family members or other “witnesses.” Agreement is normally reached or ‘proved’ without the complainant continuing into another forum. Except in complex cases where additional investigation or involvement of third parties is required KRC will respond to written grievances within thirty days. Responses generally include a settlement proposal. Grievances of a legal nature are forwarded to KRC’s Legal Representative in Pristina for redress. Responses/settlements are coordinated through the on-site management team.

2. KRC will instigate regular meetings which will provide a forum at which individual and community grievances may be raised, discussed, and resolved with Company officials.
3. Court Action: Kosovar citizens and legal entities have access to court recourse in conformance with applicable laws.

## **5.0 ONGOING PUBLIC CONSULTATION AND COMMUNITY RELATIONS**

### **5.1 INFORMAL STAKEHOLDER CONSULTATIONS**

KRC has pursued a vigorous community outreach strategy throughout the planning process, endeavouring to build trust and facilitating open information exchange among stakeholders. KRC through its country manager and Directors of LI interact with the local community regularly, consulting on a broad range of issues with local leadership – traditional and political – and the general population. These interactions happen as KRC representatives are on their daily rounds, meeting with local people, providing informal updates on the progress of the Project, and answering questions. KRC's decision to include all stakeholders into the dialogue when the concession was acquired has helped develop broad community support.

### **5.2 FUTURE CONSULTATION ACTIVITIES**

KRC believes that public consultation is an ongoing process and plans to continue the stakeholder efforts throughout the construction, operations, and closure phases of the Project. As the Project progresses through its phases, LI's message will change to reflect the issues and concerns of each phase. The pre-construction/construction public consultation and disclosure focused on imparting key messages about LRC and their approach to mining, social investment and the specific Project. Future key messages will contain more information about employment and training, safety, environmental monitoring and health awareness.

KRC is committed to maintaining its ongoing programme and will:

- Maintain regular communications with all stakeholders, including the media in accordance with LI's Communication Plan;
- Provide local residents with regular information on the progress of work and related implications;
- Provide local residents with information on employment and training opportunities;
- Maintain awareness of safety issues around transport and road alignments;
- Maintain constructive relationships between local residents and KRC Project development team by continuing regular information meetings and informal interactions;
- Identify and respond to new stakeholder issues and concerns by reviewing the complaints file and listening to stakeholders;
- Monitor implementation of mitigations measures for resettlement and compensation programs;
- Monitor implementation and effectiveness of mitigation measures; community development plan, and other social investment programs;
- Monitor community attitudes toward KRC and the Project;
- Ensure complaints are addressed according to the established

process; Ensure gender sensitive and culturally appropriate processes are used in communication and interactions;

### 5.3 **CONSULTATIVE LIAISON COMMITTEE**

A Consultative Liaison Committee (CLC) will be formed with broad stakeholder representation to provide a structured and sustainable consultation mechanism for the life of the Project.