Environmental and Social management plan
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ANNEXES
Annex 1: Major Roşia Montană Project Environmental and Social Management Plan Implementation Actions, Frequencies, and Responsibilities ......................................................... 33
1 GENERAL REQUIREMENTS

The Roşia Montană Project Environmental and Social Management Plan documents the requirements of a comprehensive Environmental and Social Management System for the Roşia Montană Project.

The Roşia Montană Project Environmental and Social Management Plan applies to the full scope of the exploration, mining, metals recovery, rehabilitation, and closure activities that will be conducted by Roşia Montană Gold Corporation (RMGC) at the Roşia Montană Project site. It is considers current European Union and World Bank Group – International Finance Corporation guidelines, the “Equator Principles”1, ISO 140012, and appropriate elements of other internationally recognised standards and best management practices as the basis for management system development and implementation.

As shown in Figure 1-1, the Roşia Montană Project Environmental and Social Management Plan is organised around five primary areas of management emphasis, which comprise a closed-loop management system model based on continual improvement concepts. The system includes several layers of feedback mechanisms designed to stimulate environmental, social, and economic improvements, while minimising associated risks and liabilities, maintaining compliance with applicable laws and regulations, and fulfilling a proactive commitment to the prevention of pollution, the management and mitigation of environmental and social impacts, and strong policies for public engagement and communication.

Together, the Roşia Montană Project Environmental and Social Management Plan and its supporting plans and procedures are designed to provide an appropriate level of detail and control that addresses RMGC environmental and social policies as well as the environmental and social impacts, regulatory compliance requirements, stakeholder interests, available personnel and financial resources, and other practical environmental and social management issues associated with Roşia Montană Project operations. A more detailed discussion of the hierarchy of documents that comprise the Roşia Montană Project Environmental and Social Management Plan is presented in Section 4.4. A table describing the major actions required to implement the requirements of the Roşia Montană Project Environmental and Social Management Plan is included in Annex 1.

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1 See http://www/equator-principles.com/principles.shtml
Figure 1-1: Environmental and Social Management System Continual Improvement Model
2 ENVIRONMENTAL AND SOCIAL POLICY

Roşia Montană Project environmental and social policies are stated in the current version of the Roşia Montană Project Environmental and Social Policies and Commitments, which is maintained separately and published as a controlled document on the RMGC website (www.rmgc.ro) as described in Section 4.5. These policies and commitments demonstrate a fundamental commitment by RMGC to:

- Achieve and maintain compliance with applicable Romanian regulatory requirements, European Union guidelines, and other relevant international standards;
- Continually seek to refine and optimise the environmental and social management practices implemented on the project;
- Manage, mitigate, or (where feasible) prevent the potentially negative environmental and social impacts associated with the Roşia Montană Project; and otherwise
- Provide demonstrable economic, social, and environmental benefits to nearby communities and the Romanian nation as a whole.

These policies and commitments also emphasise open communication and consideration of the environmental and social interests of the adjacent communities, regulatory agencies, and other interested parties who have an interest or stake in RMGC performance. The suitability and effectiveness of the published version of the RMGC EIA policies and commitments evaluated on at least an annual basis through the management review processes described in Section 6 of this Plan.

The contents of the Roşia Montană Project Environmental and Social Policies and Commitments document will also be communicated to RMGC personnel through annual environmental and social awareness training and by posting the document on the company website, as previously noted. These requirements will also be communicated to RMGC contractors through their procurement documents or contracts (see Section 4.3). Published copies of the current version of the Roşia Montană Project Environmental and Social Policies and Commitments will be made available to interested parties in response to specific requests for information or as may otherwise be directed by RMGC management.
3 PLANNING

3.1 Environmental and Social Aspects and Impacts

An initial assessment of the environmental and social aspects and potential impacts associated with the exploration, mining, ore recovery, rehabilitation, and closure operations that RMGC directly controls (or over which it can be reasonably expected to have influence) is documented in Chapter 4.0 of the Roșia Montană Project Environmental Impact Assessment. The Environmental Impact Assessment (EIA) was prepared in accordance with:

- Current Romanian EIA regulations, as stated in Ministerial Order 863, Annex 2. II, “Structure of the Report on the Environmental Impact Assessment Study” (Ministry of Waters and Environmental Protection, Republic of Romania, 2004);
- Guidelines published by the European Union that are potentially applicable to RMGC operations due to the accession of Romania to the European Union;
- Current World Bank Group – International Finance Corporation guidelines; and
- Appropriate elements of other internationally recognised standards (e.g. United Nations Environment Programme guidance documents or the “Equator Principles”) and other best practices applicable to EIA processes for mining operations.

The environmental and social impacts identified in Chapter 4.0 of the EIA will be summarised and documented in a project-specific register, and will be evaluated on at least an annual basis in accordance with any additions, changes, or modifications that may result from MP-01, “Identification and Update of Environmental and Social Aspects and Impacts.” Such modifications may be required as a result of changing environmental or operational conditions, stakeholder interests, regulatory requirements, or other considerations, and will be reflected in appropriate modifications to management and mitigation measures RMGC in accordance with MP-16, “Environmental and Social Performance Improvement Process”, as discussed in Section 3.3.

Figure 3-1 presents a flowchart describing the general integration of elements of the EIA process with other major elements of the Environmental and Social Management System.
Figure 3-1: Interaction of Environmental and Social Impact Assessment/Update Processes with Other Environmental and Social Management System Elements

- Review current legal requirements per MP-02
- Review communications log, stakeholder correspondence per MP-04
- Update E&S aspects/impacts register per MP-01, as required
- Adjust/update mitigation measures per MP-16, as required
- Conduct management review per MP-14
- Resolve comments per MP-14
  - Mgmt. Review Board accept?
    - No
      - Implement mitigation measures; prepare/update procedures as required per MP-06
      - Resolve per MP-10
    - Yes
      - Non-conformances?
        - No
          - File records per MP-12
        - Yes
          - Resolve per MP-10

- Distributed/redistribute EIA, apps. & procedures per MP-05
- Update/establish POs or contracts per MP-07
- Update mine planning documents per MP-15
- Train/retrain RMGC and contractor personnel per MP-03
- Monitor/assess performance per E&S Monitoring Plan, MP-08, -09, -13, -14, -16

- No Non-conformances?
  - Implement mitigation measures; prepare/update procedures as required per MP-06
  - Resolve per MP-10
- File records per MP-12

Section 3: Planning
3.2 Legal and Other Requirements

RMGC will develop and maintain a precise understanding of the legal and regulatory requirements that apply to its operations, as well as any associated permitting, planning, operating, monitoring, or reporting requirements. MP-02, “Identification of Legal, Regulatory, and Other Requirements” provides guidance in the development and update of a Project-specific register of regulatory requirements. Industry-specific guidelines [e.g. International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide In the Production of Gold (International Cyanide Management Institute, 2002)] or other standards or requirements with which RMGC voluntarily chooses to conform with as operating requirements will also be documented in the register. As noted in MP-02, RMGC will maintain access to government-produced gazettes and other appropriate information services to stay abreast of pertinent regulatory changes.

The adequacy and accuracy of RMGC understanding of its regulatory compliance requirements (and continued compliance with those requirements) will be verified on at least an annual basis in accordance with MP-09 “Regulatory Compliance Verifications” as noted in Section 5.2.

3.3 Performance Improvement Programme

RMGC will conduct an annual environmental and social performance review and implement an improvement process that identifies specific management and mitigation measures (and appropriate operational controls or specific improvement actions) for the environmental and social impacts identified in the EIA and subsequent aspects and impacts registers, as noted in Section 3.1. The performance review process is documented in MP-16, “Environmental and Social Performance Improvement Process.” MP-16 is designed to ensure that improvement actions are prioritised on the basis of the relative magnitude of their associated impacts, the presence or absence of regulatory or stakeholder issues, the adequacy or effectiveness of current operational controls or management and mitigation measures, and other appropriate factors. The procedure also requires provision of technical guidance and appropriate scheduling information for each discrete performance improvement action taken, at appropriate functional levels of the RMGC organisation. Consideration of current regulatory requirements (see Section 3.2) and the specific issues expressed by external stakeholders (see Section 4.3 and MP-04, “Management of Environmental and Social Complaints and Information Requests”) must also be considered in the process of preparing and updating individual improvement instructions. Progress towards the completion of the improvement actions so defined in Performance Improvement Instructions will be monitored as described in Section 5.1 and the Roşia Montană Project Environmental and Social Monitoring Plan.

Final review and approval of specific improvement actions will be conducted as part of the annual management review process described in Section 6.0 of this plan.
Notes:
The administration assistants work opposite schedules; they overlap for one day every week.
As a rule, every employee that works only day shift on a (8x6) rotation schedule that overlaps with another employee for full daily coverage.
General manager and operations manager work opposite schedules overlapping one day per week.
Note the indirect line of reporting of the Supply Chain Manager to the Finance Manager and the direct line to the Operations Manager.
Figure 4-2 provides additional details of the organisation of the RMGC Environmental Department.

![Environmental Department Organisation Diagram]

Figure 4-2: Environmental Department Organisation

Specific roles and responsibilities relative to Environmental and Social Management System implementation are defined for the key personnel identified in Figures 4-1 and 4-2 (as well as general environmental responsibilities applicable to RMGC employees) in the following paragraphs; additional details are provided in Annex 1.

- **Managing Director**

  The RMGC Managing Director is responsible for ensuring that appropriate resources are allocated, in balance with the company’s other operational needs, in order to help achieve corporate environmental and social policy goals and to effectively implement the management and mitigation measures identified in the EIA. The Managing Director is also responsible for the review and approval of the Roşia Montană Project Environmental and Social Policies and Commitments and for chairing the annual management review process described in Section 6.0.

- **Functional or Operational Directors**

  The Directors of individual RMGC functional or operational units (e.g. Production, Community Relations, Exploration, Projects) are responsible for supporting the provisions of the Environmental and Social Management System, and for designating co-ordinators from each unit to assist in System implementation. These Directors or their designees are also a member of the Management Review Board, and are active participants in the management review process described in Section 6.0 of this plan.
The Directors of Projects and Exploration have additional specific responsibilities for implementation of the mine planning process as discussed in Section 4.6.1.

- **Manager, Environmental Management**

The Manager, Environmental Management is responsible to the Director – Permits, Compliance, and Management Systems for ensuring that the environmental portions of the Environmental and Social Management System embodied by the *Roşia Montană Project Environmental and Social Management Plan* are properly implemented and maintained. The Manager, Environmental Management is also responsible for periodically reporting on the performance of the environmental elements of the Environmental and Social Management System through the management review process described in Section 6.0, and for managing and/or participating in the various monitoring, inspection, compliance verification, performance verification, and corrective and preventive action processes leading to the systematic improvement of environmental and social performance.

- **Environmental Officer**

The Environmental Officer reports to the Manager, Environmental Management, and has primary responsibility for identification and maintaining a current understanding of all applicable regulatory compliance requirements (see Section 3.2); for providing assistance in obtaining all required environmental permits; and for periodically verifying continuing compliance with such requirements (see Section 5.2).

- **Assistant Manager, Community Relations**

The Assistant Manager, Community Relations is responsible for ensuring that the social components of the *Roşia Montană Project Environmental and Social Management Plan* are properly implemented and maintained. The Assistant Manager, Community Relations is also responsible for periodically reporting on the performance of the social elements of the Environmental and Social Management System through the management review process described in Section 6.0, and for participating in the various monitoring, inspection, compliance verification, performance verification, and corrective and preventive action processes that contribute to the systematic improvement of environmental and social performance.

- **Health and Safety Manager**

The Health and Safety Manager reports to the Managing Director and has overall responsibility for ensuring that the workplace health and safety practices documented in the RMGC *Occupational Health and Safety Plan* and Section 9 of the RMGC *Standard Operating Procedures Manual* are properly implemented. The Health and Safety Manager also has a key role in the implementation of the *Emergency Preparedness and Spill Contingency Plan*, and is a participant in the management review process described in Section 6.0.

- **Environmental and Social Management System Co-ordinators**

In addition to their routine work assignments, Environmental and Social Management System Coordinators are responsible to their respective line managers or supervisors for assisting the Manager, Environmental Management and Assistant Manager, Community Relations in the implementation of the Environmental and Social Management System, and for serving as a primary point of contact within their
assigned work areas for training support or for resolution of environmental and social issues.

- **Independent Compliance Management Team**

The Independent Compliance Management Team is responsible to the Managing Director for conducting periodic verifications of compliance with regulatory requirements, as noted in Section 5.2, as well as the overall performance of the Environmental and Social Management System, as discussed in Section 5.4. The Independent Compliance Management Team is comprised of RMGC personnel and/or independent contractors or consultants, subject to the functional independence, qualification, and training requirements specified in MP-09, “Regulatory Compliance Verifications” and MP-12, “Internal Environmental and Social Management System Performance Verifications.”

- **Management Review Board**

The Management Review Board is responsible for conducting a comprehensive internal management review of the overall suitability and effectiveness of the Roșia Montană Project Environmental and Social Management System, on an annual basis as discussed in Section 6 and MP-13, “Management Reviews.” The Management Review Board is chaired by the Managing Director; other members will include the Functional/Operational Directors and General Counsel, with the assistance of the Manager, Environmental Management and Assistant Manager, Community Relations.

- **RMGC Personnel**

RMGC employees are individually and collectively responsible for:

- Working safely, within the guidelines provided by workplace health and safety procedures, the RMGC Occupational Health and Safety Plan, and the Roșia Montană Project Emergency Preparedness and Spill Contingency Plan;
- Supporting the environmental and social policy goals set for the Roșia Montană Project in the daily performance of their work;
- Complying with the specific requirements of the Roșia Montană Project Environmental and Social Management Plan and its supporting documents;
- Notifying their immediate manager, supervisor, or Environmental and Social Management System Co-ordinators regarding any spills, equipment malfunctions, or unsafe situations that could have a negative environmental or social impact; and
- Notifying the Manager, Environmental Management or the Assistant Manager, Community Relations of any conditions or weaknesses in practice that could represent a non-conformance with the requirements of this Roșia Montană Project Environmental and Social Management Plan.
4.2 Training, Awareness, and Competence

The current version of the Roșia Montană Project Environmental and Social Policies and Commitments document will be posted in strategic facilities and locations throughout the operations, as well as on the company’s website. In addition, RMGC personnel will be provided with training that is appropriate and commensurate with the regulatory compliance issues and the complexity or potential severity of the environmental and social impacts associated with their routine and emergency work assignments. Appropriate levels of training will be determined through annual reviews of job descriptions. Minimum training curricula will be developed for each job description as described in MP-03 “Environmental and Social Management System Training.” At a minimum, new hires and other RMGC employees will receive environmental awareness training that addresses the company’s environmental and social policies and commitments and that summarises:

- major regulatory compliance issues or stakeholder concerns that must be considered in day-to-day operations;
- the primary environmental and social impact management and mitigation measures that are being undertaken on the Roșia Montană Project; and
- a general summary of the provisions of the Environmental and Social Management System embodied by this plan.

Refresher training will be provided on at least an annual basis in order to maintain general awareness of any changes in RMGC policies, the regulatory compliance issues associated with mine operations, or the other requirements and purposes of this plan. Additional training in the specific requirements of other supporting plans, procedures, or other documents will be provided, as appropriate for individual work assignments. This will include special job-specific training related to critical facilities management issues, health and safety issues, other procedural responsibilities, or to other activities that support the implementation of the Environmental and Social Management System or the improvement of RMGC environmental and social performance. Specific training requirements applicable to suppliers or contractors will be defined within the context of their individual contracts or purchase orders as discussed in MP-07, “Purchasing” and Section 4.6.3.

4.3 Communication

The requirements of current RMGC environmental and social policies and commitments, this plan, and other Environmental and Social Management System support documents will be communicated to RMGC personnel through the training processes described in Section 4.2, or by controlled distribution of specific documents as described in Section 4.5, as appropriate for the potential environmental and social impacts associated with individual work assignments.

Formal outreach programs and meetings with private citizens, environmental groups, regulatory agencies, or other external stakeholders may be initiated at the discretion of the Managing Director (with the assistance of the Manager, Environmental Management; the Assistant Manager, Community Relations; and other management personnel) in accordance with the Roșia Montană Project Public Consultation and Disclosure Plan. The Public Consultation and Disclosure Plan is designed to ensure that:
• Adequate and timely information about Roşia Montană Project activities is provided to the external stakeholder community;
• Sufficient opportunity is given to stakeholders to present questions and opinions; and
• External stakeholders are empowered to make a meaningful contribution to the EIA process and the implementation of the Environmental and Social Management System, over the entire life cycle of the project.

The Public Consultation and Disclosure Plan provides a framework for the information dissemination techniques, consultation methods, and communication tools that will be used during the different phases of the project for each of the key stakeholders groups.

In addition, incoming verbal or written correspondence related to Roşia Montană Project environmental and social policy, practices, or performance will be referred to the Manager, Environmental Management or the Assistant Manager, Community Relations for logging, evaluation, and appropriate responses or other actions, in accordance with MP-04, “Management of Environmental and Social Complaints and Information Requests.” Copies of the Roşia Montană Project Environmental and Social Policies and Commitments document may be distributed without restriction in response to specific requests for information. However, this plan may not be distributed externally without prior authorisation by the Manager; Environmental Management; the Assistant Manager, Community Relations; and the Managing Director. With the exception of the routine submittals of information that may be required by governing regulations, specific information or environmental records will not be released without the prior evaluation and authorisation required by MP-04.

4.4 Environmental and Social Management System Documentation

The Roşia Montană Project Environmental and Social Management System is documented in several tiers or levels of detail, as shown in Figure 4-3.

Each level is further described as follows:

Level 1 - consists of the Roşia Montană Project Environmental and Social Policies and Commitments document, as published on the Company website;

Level 2 - consists of this Roşia Montană Project Environmental and Social Management Plan;
Figure 4-3: Environmental and Social Management System Document Hierarchy

Level 3 - consists of a suite of environmental management plans, which are invoked to support the continuing management and mitigation of the potential environmental and social impacts associated with Roşia Montană Project operations. Originally developed to support the EIA process, these documents also play an active and continuing role as components of the Roşia Montană Project Environmental and Social Management System. They are listed as follows:

- Waste Management Plan
- Water Management and Erosion Control Plan
- Air Quality Management Plan
- Noise and Vibration Management Plan
- Tailings Facility Management Plan
- Cyanide Management Plan
- Biodiversity Management Plan
- Emergency Preparation and Spill Contingency Plan
- Mine Rehabilitation and Closure Management Plan
- Public Consultation and Disclosure Plan
- Resettlement and Relocation Action Plan
- Community Sustainable Development Plan
- Cultural Heritage Management Plan
- Environmental and Social Monitoring Plan

Table 4-1 cross-references these documents to the specific sections of the Roşia Montană Project Environmental and Social Management Plan that they are intended to support.
Level 4 - The fourth tier of support documents includes lower-tier standard operating procedures and other operational practices that have been established to support the Level 2 and 3 documents previously described, with emphasis on the management of those areas in which the EIA process indicates that potentially significant environmental or social impacts are known to exist or are likely to occur in later phases of mine life.

The standard operating procedures are maintained separately in the RMGC Standard Operating Procedures Manual, and are grouped to correspond to the planning area that they are primarily designed to support. Section 1 of the RMGC Standard Operating Procedures Manual includes those procedures that have been developed specifically to support the Roşia Montană Project Environmental and Social Management Plan. These are:

- MP-01, “Identification and Update of Environmental and Social Aspects and Impacts”;
- MP-02, “Identification of Legal and Regulatory Requirements”;
- MP-03, “Environmental and Social Management System Training”;
- MP-04, “Management of Environmental and Social Complaints and Information Requests”;
- MP-05, “Review, Approval, Controlled Distribution, and Update of Environmental and Social Management System Documents”;
- MP-06, “Preparation of Standard Operating Procedures”;
- MP-07, “Purchasing”;
- MP-08, “Surveillance Inspection”;
- MP-09, “Regulatory Compliance Verifications”;
- MP-10, “Corrective and Preventive Action for Environmental and Social Action Program Non-conformances”;
- MP-11, “Management of Environmental and Social Management System Records”;
- MP-12, “Internal Environmental and Social Management System Performance Verifications”;
- MP-13, “Management Reviews”;
- MP-14, “Mine Planning Process”; and
- MP-15, “Exploration Planning”; and

Table 4-1 cross-references these documents and several other standard operational practices (e.g. the RMGC Occupational Health and Safety Plan, Project Meteorological Station Operation Manual, and Stream Flow Measurement Process Operation Manual) to the specific sections of the Roşia Montană Project Environmental and Social Management Plan that they are intended to support.

Level 5 - consists of internal memoranda, correspondence, environmental aspects specifications, regulatory requirements lists, monitoring data, reports, regulatory submittals, and other completed documents or records developed in response to regulatory requirements or resulting from the implementation of the Roşia Montană Project Environmental and Social Management Plan and its Level 3 and 4 support documents.
### Table 4-1: Matrix of Environmental and Social Management System Documents

<table>
<thead>
<tr>
<th>Roșia Montană Project Environmental &amp; Social Management Plan Section/Title</th>
<th>Level 3 Support Documents (EIA &amp; Action Plans)</th>
<th>Level 4 Support Documents (Standard Operating Procedures/Practices)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.0 GENERAL REQUIREMENTS</strong></td>
<td>None required</td>
<td>None required</td>
</tr>
<tr>
<td><strong>2.0 ENVIRONMENTAL AND SOCIAL POLICY</strong></td>
<td>None; the Roșia Montană Project Environmental and Social Management Plan text cross-references RMGC’s current environmental and social policy documents.</td>
<td>None; the Roșia Montană Project Environmental and Social Management Plan text references RMGC’s current environmental and social policy documents.</td>
</tr>
<tr>
<td><strong>3.0 PLANNING</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.1 Environmental and Social Aspects and Impacts</td>
<td>• EIA</td>
<td>• MP-01, “Identification and Update of Environmental and Social Aspects and Impacts”</td>
</tr>
<tr>
<td>3.2 Legal and Other Requirements</td>
<td>None</td>
<td>• MP-02, “Identification of Legal and Regulatory Requirements”</td>
</tr>
<tr>
<td>3.3 Performance Improvement Programme</td>
<td>• EIA</td>
<td>• MP-01, “Identification and Update of Environmental and Social Aspects and Impacts”</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• MP-02, “Identification of Legal and Regulatory Requirements”</td>
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<tr>
<td></td>
<td></td>
<td>• MP-04, “Management of Environmental and Social Complaints and Information Requests”</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• MP-16, “Environmental and Social Performance Improvement Process”</td>
</tr>
<tr>
<td><strong>4.0 IMPLEMENTATION AND OPERATION</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.1 Structure and Responsibility</td>
<td>None required; addressed in main text of Roșia Montană Project Environmental and Social Management Plan</td>
<td>None required; addressed in main text of Roșia Montană Project Environmental and Social Management Plan</td>
</tr>
<tr>
<td>4.2 Training, Awareness, and Competence</td>
<td>See next column</td>
<td>• MP-03, “Environmental and Social Action Program Training”</td>
</tr>
<tr>
<td>4.3 Communication</td>
<td>• Public Consultation and Disclosure Plan</td>
<td>• MP-04, “Management of Environmental and Social”</td>
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<tr>
<td><strong>Roșia Montană Project Environmental &amp; Social Management Plan</strong> Section/ Title</td>
<td><strong>Level 3 Support Documents (EIA &amp; Action Plans)</strong></td>
<td><strong>Level 4 Support Documents (Standard Operating Procedures/Practices)</strong></td>
</tr>
<tr>
<td>---</td>
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</tr>
</tbody>
</table>
| Environmental and Social Management System Documentation | None required; addressed in main text of Roșia Montană Project Environmental and Social Management Plan. | Complaints and Information Requests*  
- MP-07, “Purchasing” |
| Document Control | See next column |  
- MP-05, “Review, Approval, Controlled Distribution, and Update of Environmental and Social Management System Documents”  
- MP-06, “Preparation of Standard Operating Procedures” |
| Operational Control |  
- Waste Management Plan  
- Water Management and Erosion Control Plan  
- Air Quality Management Plan  
- Noise and Vibration Management Plan  
- Tailings Facility Management Plan  
- Cyanide Management Plan  
- Biodiversity Management Plan  
- Emergency Preparation and Spill Contingency Plan  
- Mine Rehabilitation and Closure Management Plan  
- Public Consultation and Disclosure Plan  
- Community Sustainable Development Plan  
- Cultural Heritage Management Plan  
- Environmental and Social Monitoring Plan Management Plan |  
- MP-14, “Mine Planning Process”  
- MP-15, “Exploration Planning”  
- MP-06, “Preparation of Standard Operating Procedures”  
- MP-07, “Purchasing”  
- MP-08, “Surveillance Inspection”  
- Sections 2, 3, 4, 5, 7, 9, 10, 11, 13, and 14 of the RMGC Standard Operating Procedures Manual |
### 4.7 Emergency Preparedness and Response
- Emergency Preparedness & Spill Contingency Plan
- Cyanide Management Plan
- Tailings Facility Management Plan
- Water Management and Erosion Control Plan

### 5.0 CHECKING AND CORRECTIVE ACTION

#### 5.1 Monitoring and Measurement
- Environmental and Social Monitoring Plan
- Biodiversity Conservation Plan
- Cyanide Management Plan
- Tailings Facility Management Plan
- Water Management and Erosion Control Plan

#### 5.2 Non-conformance Reporting and Corrective and Preventive Action
See next column

#### 5.3 Environmental and Social Management System Records
See next column

#### 5.4 ESMS Audits
See next column

#### 6.0 MANAGEMENT REVIEW
See next column

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**Roșia Montană Project Environmental & Social Management Plan**

<table>
<thead>
<tr>
<th>Section/Title</th>
<th>Level 3 Support Documents (EIA &amp; Action Plans)</th>
<th>Level 4 Support Documents (Standard Operating Procedures/Practices)</th>
</tr>
</thead>
</table>
| 4.7 Emergency Preparedness and Response | • Emergency Preparedness & Spill Contingency Plan  
• Cyanide Management Plan  
• Tailings Facility Management Plan  
• Water Management and Erosion Control Plan | • RMGC Occupational Health and Safety Plan  
• Sections 7 and 9 of the RMGC Standard Operating Procedures Manual |

<table>
<thead>
<tr>
<th>5.0 CHECKING AND CORRECTIVE ACTION</th>
<th></th>
</tr>
</thead>
</table>
| 5.1 Monitoring and Measurement | • Environmental and Social Monitoring Plan  
• Biodiversity Conservation Plan  
• Cyanide Management Plan  
• Tailings Facility Management Plan  
• Water Management and Erosion Control Plan | • MP-08, “Surveillance Inspection”  
• MP-09, “Regulatory Compliance Verifications”  
• RMGC Project Meteorological Station Operation Manual  
• Roșia Montană Environmental Database  
• Sections 2, 4, 8, 11, and 12 of the RMGC Standard Operating Procedures Manual |

| 5.2 Non-conformance Reporting and Corrective and Preventive Action | • MP-10, “Corrective and Preventive Action for Environmental and Social Management System Non-conformances” |
| 5.3 Environmental and Social Management System Records | • MP-12, “Management of Environmental and Social Management System Records”  
• Roșia Montană Environmental Database |

| 5.4 ESMS Audits | • MP-12, “Internal Environmental and Social Management System Performance Verifications” |
| 6.0 MANAGEMENT REVIEW | • MP-13, “Management Reviews”  
• MP-14, “Mine Planning Process” |
4.5 Document Control

The Level 1, 2, 3, and 4 documents described in Section 4.4 will be controlled and distributed in accordance with MP-05, “Review, Approval, Controlled Distribution, and Update of Environmental and Social Management System Documents.” MP-05 also provides user instructions and maintenance requirements for the Roșia Montană Environmental Database. New standard operating procedures will be developed in accordance with the guidelines provided in MP-06, “Preparation of Standard Operating Procedures.” Historical copies of current and superseded versions of controlled documents will be retained per Section 5.3 and MP-11, “Management of Environmental and Social Management System Records.”

4.6 Operational Control

4.6.1 Mine Planning Process

RMGC will prepare or update an Annual Mining Plan in accordance with MP-14, “Mine Planning Process” that projects the general scope of anticipated mining activity over the ensuing planning year. Planning for any anticipated exploration activities will be developed as an appendix to the Annual Mining Plan in accordance with MP-15, “Exploration Planning.” As noted in Figure 4-4, preparers of the Annual Mining Plan will specifically consider the impacts and management and mitigation measures noted in the current EIA in the preparation of the draft document, which will be submitted for evaluation by the Management Review Board, as noted in Section 6.0 and procedure MP-13, “Management Reviews.” This level of review will ensure that regulatory and stakeholder issues are properly considered, along with general feedback on Roșia Montană Project environmental and social performance. Once approved, the Annual Mining Plan will form the general framework within which monthly and weekly mine planning meetings are conducted. Mining instructions will be produced as the output of such meetings or as otherwise directed by the Director – Projects or the Director – Exploration. Such instructions will be distributed to supervisory and other personnel as necessary to guide ongoing mining operations.
Figure 4-4: Mine Plan Preparation and Update Process
4.6.2 Control of Potential Environmental and Social Impacts
As noted in Section 4.4, a suite of detailed environmental and social management plans has been developed to address the management of those areas in which the EIA process has indicated that potentially significant environmental or social impacts are known to exist or are likely to occur in later phases of mine life. Plans with specific operational control roles include the following:

- Waste Management Plan;
- Water Management and Erosion Control Plan;
- Air Quality Management Plan;
- Noise and Vibration Management Plan;
- Tailings Facility Management Plan;
- Cyanide Management Plan;
- Biodiversity Management Plan;
- Emergency Preparation and Spill Contingency Plan;
- Mine Rehabilitation and Closure Management Plan;
- Public Consultation and Disclosure Plan;
- Community Sustainable Development Plan;
- Cultural Heritage Management Plan; and the
- Environmental and Social Monitoring Plan.

These plans are supported by the standard operating procedures provided in the corresponding Sections of the RMGC Standard Operating Procedures Manual. They are subject to periodic evaluation, refinement, and update in response to changing regulatory conditions, facility changes, or other change requirements, via the process described in Section 3.3 and MP-16, “Environmental and Social Performance Improvement Process”, as well as the management review process described in Section 6.0 and MP-13, “Management Reviews.”

4.6.3 Control of Contractor Operations
RMGC purchasing personnel will co-coordinate with the Manager, Environmental Management or Assistant Manager, Community Relations as necessary to ensure that appropriate elements or requirements of the Roșia Montană Project Environmental and Social Management Plan are applied in the purchase orders and contracts issued to suppliers and onsite contractors. Special contractual controls apply to the suppliers and transporters of reagent cyanide as noted in the Cyanide Management Plan. Appropriate contractual requirements will be invoked to ensure that delivered supplies or contractor operations do not negatively impact the regulatory compliance status of the Roșia Montană Project or the effectiveness of its management and mitigation measures, and otherwise remain consistent with the requirements of this plan. At the discretion of the Manager, Environmental Management or the Assistant Manager, Community Relations, contractor personnel may be requested to attend general awareness training sessions as described in Section 4.2.

4.7 Emergency Preparedness and Response
The Roșia Montană Project Emergency Preparedness and Spill Contingency Plan is designed to minimise the potential for (and for responding to) accidents and emergency situations involving mining, mineral extraction, and tailings management and disposal operations, in concert with the Cyanide Management Plan, the Tailings Facility Management Plan.
Plan, the Water Management and Erosion Control Plan, and other management plans developed for specific operational activities. The Emergency Preparedness and Spill Contingency Plan identifies the roles and responsibilities of Health and Safety personnel and other key individuals, and will provide direction with regard to when to respond (and what measures are to be taken) in the case of an operational emergency or environmental disaster. The Emergency Preparedness and Spill Contingency Plan is supported by the RMGC Occupational Health and Safety Plan and routine workplace safety procedures (Section 9 of the RMGC Standard Operating Procedures Manual), as well as several additional procedures (see Section 7 of the RMGC Standard Operating Procedures Manual) that are focused specifically on emergency functions or the safe management of hazardous substances.

The Emergency Preparedness and Spill Contingency Plan contains requirements for periodic tests and drills to ensure that response procedures are well understood by RMGC and community emergency response personnel, and the workforce as a whole. In addition to the emergency notification requirements addressed in the Emergency Preparedness and Spill Contingency Plan, the circumstances and response actions associated with any significant spills, releases, or other emergency situations for which RMGC is directly responsible will be promptly documented, thoroughly investigated, and appropriate corrective and preventive actions taken in conformance with Section 5.2 of this plan and MP-10, “Corrective and Preventive Action for Environmental and Social Management System Non-conformances.”
5 CHECKING AND CORRECTIVE ACTION

5.1 Monitoring and Measurement

5.1.1 Environmental and Social Management System Monitoring
A comprehensive program is defined in the Roșia Montană Project Environmental and Social Monitoring Plan that addresses the planning, execution, and reporting requirements associated with the voluntary or regulation-based environmental or social issue-related monitoring requirements invoked for Roșia Montană Project operations. The sources of these requirements include:

- The Roșia Montană Project environmental (physical, chemical, and biological) monitoring program, as established in the RMGC Stream Flow Measurement Process Operation Manual, the RMGC Project Meteorological Station Operation Manual; and the current release of the Roșia Montană Environmental Database;
- Additional environmental and social monitoring parameters as identified by governing regulations;
- Progress-monitoring requirements associated with the implementation of specific management and mitigation measures recommended by the EIA process (see Section 8.1.2.3) and the Environmental and Social Performance Improvement Plan;
- Other specific inspection or monitoring requirements, as established by individual management plans or RMGC management request.

Any non-conformances noted in monitoring processes will be resolved through the implementation of uniform corrective and preventive action procedures, as noted in Section 5.2. The Environmental and Social Monitoring Plan describes the preparation, review, approval, and issue of an annual monitoring report and a periodically updated database designed to facilitate the planning and timely execution of necessary monitoring and reporting actions. Monitoring report results and database content updates are directly linked to the management review process described in Section 6.0.

5.1.2 Regulatory Compliance Verifications
On at least an annual basis, the Manager, Environmental Management and Assistant Manager, Community Relations will co-ordinate with the Independent Compliance Management Team to conduct a detailed verification of Roșia Montană Project compliance with applicable national, regional, and local regulations, in accordance with MP-09, "Regulatory Compliance Verifications." Independent Compliance Management Team members may include RMGC personnel or qualified contractors, subject to the functional independence, training, and qualification requirements of MP-09. The current versions of the regulatory requirements register developed under Section 3.2 and MP-02, “Identification of Legal and Regulatory Requirements” will be used as a primary reference for the verification exercise, and verification results will be considered in any subsequent updates to the register. Additional regulatory compliance verifications may be conducted at the discretion of the Manager, Environmental Management and Assistant Manager, Community Relations, or upon request by the Managing Director. Any action items identified as part of such activities that identify or suggest an environmental or social non-conformance will be promptly documented and resolved as required by Section 5.2 and MP-10, “Corrective and Preventive Action for Environmental and Social Management System Non-conformances.”
5.1.3 **Surveillance Inspections**

Detailed inspections or examinations of any part of Roşia Montană Project operations or specific contractor activities may be conducted at the discretion of the Manager, Environmental Management or the Assistant Manager, Community Relations in accordance with MP-08, “Surveillance Inspections.” Any non-conformances identified as a result of such inspections that identify or suggest an environmental or social non-conformance will be promptly documented and resolved as required by Section 5.2 and MP-10, “Corrective and Preventive Action for Environmental and Social Management System Non-conformances.”

5.1.4 **Calibration of Environmental Measurement and Test Equipment**

Unless otherwise specified in a governing management plan, all measuring and test equipment used for monitoring critical processes, effluents, and emissions pursuant to a regulatory permit condition or reporting requirement will be calibrated and maintained in accordance with manufacturer’s instructions or other appropriate directions. Copies of calibration and maintenance records for such devices will be identified with the equipment item name and serial number, and maintained in accordance with Section 5.3 and procedure MP-11, “Management of Environmental and Social Management System Records.”

5.2 **Non-conformance Reporting and Corrective and Preventive Action**

RMGC personnel are responsible for bringing suspected non-conformances, spills or releases of potentially hazardous wastes or materials, or other existing or potential emergency situations to the immediate attention of their assigned Environmental and Social Management System Co-ordinator, line manager, or supervisor, who will forward such information to the Manager, Environmental Management or Assistant Manager, Community Relations for evaluation. In addition to the specific response actions that may be required by the current *Emergency Preparedness and Spill Contingency Plan* (see Section 4.7) such situations will be promptly evaluated, documented, thoroughly investigated, and appropriate management actions taken in conformance with the corrective and preventive action processes described in MP-10, “Corrective and Preventive Action for Environmental and Social Management System Non-conformances.”

Non-conformances are defined as conditions that are within the ability of RMGC to control or substantially influence that:

- Represent a permit violation or do not comply with applicable regulatory compliance requirements;
- Have or could result in unanticipated negative environmental or social impacts;
- Are contrary to RMGC policy commitments; or
- Represent a lack of conformance with the provisions of this Roşia Montană Project Environmental and Social Management Plan and its supporting documents.

If (in the judgement of the Manager, Environmental Management or Assistant Manager, Community Relations) a non-conformance exists, a Corrective and Preventive Action Request will be initiated and tracked until closure in conformance with the requirements of MP-10. The requirements of MP-10 will apply uniformly to the resolution of non-conformances for which RMGC is responsible and result from:

- Direct observations or reports;
- Surveillance inspections (see Section 5.1.3);
- Periodic regulatory compliance verifications (see Section 5.1.2);
- Annual internal performance verifications (see Section 5.4); or
Any external inspections or audits conducted by (or at the direction of) regulatory agencies or other external organisations.

Corrective and Preventive Action Requests and tracking logs are key environmental performance records and will be maintained as described in Section 5.3 and MP-11, “Management of Environmental and Social Management System Records.” Such information will be routinely evaluated, as appropriate, in the planning of regulatory compliance verifications, performance verifications, and management reviews (see Section 6.0).

5.3 Environmental and Social Action Program Records

Records generated as the output of the Environmental and Social Management System documents described in Section 4.4 will be identified, filed, and maintained under the direction of the Manager, Environmental Management or Assistant Manager, Community Relations in accordance with procedure MP-11, “Management of Environmental and Social Management System Records.” Records are defined as legible and completed documents, in hard-copy or electronic format, that provide objective evidence of the completion of any of the specific actions required to implement this Roșia Montană Project Environmental and Social Management Plan and its supporting documents. MP-11 defines the overall file organisation of the records; retention times; storage and retrieval requirements; access control protocols, and other measures designed to preserve records integrity and accessibility. MP-11 also addresses the management of environmental monitoring data stored in the Roșia Montană Environmental Database.³

5.4 Environmental and Social Management System Performance Verifications

A comprehensive evaluation will be performed on at least an annual basis that addresses the functionality of the various environmental and social management plans, procedures, and other elements of the Environmental and Social Management System, in conformance with MP-12, “Internal Environmental and Social Management System Performance Verifications.” Verification responsibilities will be assigned to an Independent Compliance Management Team comprised of RMGC personnel and/or independent contractors or consultants, subject to the functional independence, qualification, and training requirements specified in MP-12. Additional performance verifications may be performed at the discretion of the Manager, Environmental Management or in response to specific requests from the Managing Director. Requests for corrective and preventive action that may be initiated from such activities must be documented and resolved in conformance with MP-10, “Corrective and Preventive Action for Environmental and Social Management System Non-conformances.” The personnel qualification and training records and the verification-specific records defined by MP-12 will be maintained as environmental records in conformance with Section 5.3 and MP-11, “Management of Environmental and Social Management System Records.”

³ Note: in addition to the monitoring program management functions defined by the Environmental and Social Monitoring Plan, the Roșia Montană Environmental Database will include historical stream flow, meteorological, hydrochemistry, well and spring inventory, groundwater level, noise, air quality, vibration, soil chemistry, and aquatic/terrestrial indicator species, and other data.
6 MANAGEMENT REVIEW

A comprehensive internal management review of the overall suitability and effectiveness of the Roșia Montană Project Environmental and Social Management System will be performed by a Management Review Board (made up of the Functional/Operational Directors and General Counsel, with the assistance of the Manager, Environmental Management and Assistant Manager, Community relations) at least annually. The Management Review Board will be chaired by the Managing Director. Such reviews will address the requirements of MP-13, “Management Reviews”, and involve the independent examination of several layers of environmental and social performance information that is developed through the routine implementation of the Roșia Montană Project Environmental and Social Management Plan. Such information typically includes:

- Known or potential environmental and social issues and the concerns of interested parties, as documented in current communication logs and supporting correspondence (see Section 4.3 and MP-04, “Management of Environmental and Social Complaints and Information Requests”);
- Minutes from meetings sponsored or attended by RMGC personnel that involve environmental or social issues;
- The current draft Annual Mining Plan that addresses the projected scope of the next year’s mining and/or exploration operations (see Section 4.6.1);
- Reports from previous management reviews conducted in accordance with this Section;
- Open and closed Corrective and Preventive Action Requests that may have been generated from the reporting of non-conformances (see Section 5.2) from periodic regulatory compliance verifications (see Section 5.1.2); monitoring trends or results (see Section 5.1.1); surveillance inspections (see Section 5.1.3); performance verifications (see Section 5.4); or any inspections or evaluations that may have been conducted by regulatory agencies or other external organisations;
- Monitoring results, the annual monitoring report, or other reports or other information collected to assess progress towards the completion of specific management and mitigation measures; and
- Other information, as appropriate.

This information will be evaluated against the requirements of the current published version of the Roșia Montană Project Environmental and Social Policies and Commitments and the current regulatory requirements register. Any anticipated changes in regulatory compliance requirements, facility changes, organisational changes, or new directives that potentially affect the company's environmental/social management practices will also be considered.

The management review will be documented in report format, and, as appropriate, will include specific recommendations for Environmental and Social Management System improvements, finalisation of the Annual Mining Plan, external sharing or publication of annual monitoring report results, or other management actions. It will be presented to the Managing Director for final review and approval. Recommended performance improvement tasks will be documented (see Section 3.3) that address Roșia Montană Project Environmental and Social Management Plan updates, potential modifications to policy and commitments, new management and mitigation measures, external communications or release of publications, or other appropriate improvement actions. Any non-conformances that may be noted in the management review will be documented and resolved as discussed in Section 5.2. Updated or modified monitoring requirements will be appropriately documented in an update to the Environmental and Social Monitoring Plan, as noted in Section 5.1.
REFERENCES

EXTERNAL REFERENCES


ROȘIA MONTANĂ PROJECT ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM REFERENCES

Roșia Montană Project Environmental Impact Assessment
Waste Management Plan
Water Management and Erosion Control Plan
Air Quality Management Plan
Noise and Vibration Management Plan
Tailings Facility Management Plan
Cyanide Management Plan
Biodiversity Management Plan
Emergency Preparation and Spill Contingency Plan
Mine Rehabilitation and Closure Management Plan
Public Consultation and Disclosure Plan
Resettlement and Relocation Action Plan
Community Sustainable Development Plan
Cultural Heritage Management Plan
Environmental and Social Monitoring Plan

RMGC standard plans/practices
- RMGC Project Meteorological Station Operation Manual
- RMGC Occupational Health and Safety Plan

RMGC Standard Operating Procedures Manual
- MP-01, “Identification and Update of Environmental and Social Aspects and Impacts”;
- MP-02, “Identification of Legal and Regulatory Requirements”;
- MP-03, “Environmental and Social Management System Training”;
- MP-04, “Management of Environmental and Social Complaints and Information Requests”;
- MP-05, “Review, Approval, Controlled Distribution, and Update of Environmental and Social Management System Documents”;
- MP-06, “Preparation of Standard Operating Procedures”;
- MP-07, “Purchasing”;
- MP-08, “Surveillance Inspection”;
- MP-09, “Regulatory Compliance Verifications”;
- MP-10, “Corrective and Preventive Action for Environmental and Social Action Program Non-conformances”;
- MP-11, “Management of Environmental and Social Management System Records”;
- MP-12, “Internal Environmental and Social Management System Performance Verifications”;
- MP-13, “Management Reviews”;

4 Note: all documents listed are controlled documents per Section 4.5 of the Roșia Montană Project Environmental and Social Management Plan; current approved versions shall be assumed to apply in all cases.
MP-14, “Mine Planning Process”;
MP-15, “Exploration Planning; and
MP-16, “Environmental and Social Performance Improvement Process.”
### Annex 1: Major Roşia Montană Project Environmental and Social Management Plan Implementation

**Actions, Frequencies, and Responsibilities**

<table>
<thead>
<tr>
<th>RMGC Environmental &amp; Social Management Plan Section/Title</th>
<th>Major Implementation Actions</th>
<th>Frequency</th>
<th>Primary Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.0 GENERAL REQUIREMENTS</strong></td>
<td>Awareness training; see Section 4.2</td>
<td>Annual (minimum)</td>
<td>Manager, Environmental Management/ Assistant Manager, Community Relations</td>
</tr>
<tr>
<td><strong>2.0 ENVIRONMENTAL AND SOCIAL POLICY</strong></td>
<td>Periodic review per management review process; see Section 6.0</td>
<td>Annual (minimum)</td>
<td>Management Review Board</td>
</tr>
<tr>
<td><strong>3.0 PLANNING</strong></td>
<td>Periodic review, with approval per annual management review process; see Section 6.0</td>
<td>Annual (minimum) or when prompted by regulatory or facility/operational changes</td>
<td>Manager, Environmental Management/ Assistant Manager, Community Relations</td>
</tr>
<tr>
<td><strong>3.1 Environmental and Social Aspects and Impacts</strong></td>
<td>Periodic review and update of requirements register, with approval by General Counsel</td>
<td>Annual (minimum) or when prompted by regulatory or facility/operational changes</td>
<td>Manager, Environmental Management/ Assistant Manager, Community Relations, with assistance of General Counsel</td>
</tr>
<tr>
<td><strong>3.2 Legal and Other Requirements</strong></td>
<td>Periodic review, with approval per annual management review process; see Section 6.0</td>
<td>Annual (minimum) or when prompted by regulatory or facility/operational changes</td>
<td>Manager, Environmental Management/ Assistant Manager, Community Relations, with assistance of General Counsel</td>
</tr>
<tr>
<td><strong>3.3 Performance Improvement Programme</strong></td>
<td>Periodic review, with approval per annual management review process; see Section 6.0</td>
<td>Annual (minimum) or when prompted by regulatory or facility/operational changes</td>
<td>Manager, Environmental Management/Assistant Manager, Community Relations</td>
</tr>
<tr>
<td>RMGC Environmental &amp; Social Management Plan Section/ Title</td>
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<td>Frequency</td>
<td>Primary Responsibilities</td>
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<tr>
<td><strong>4.0 IMPLEMENTATION AND OPERATION</strong></td>
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<tr>
<td>4.1 Structure and Responsibility</td>
<td>Periodic review per management review process; see Section 6.0</td>
<td>Annual (minimum)</td>
<td>Management Review Board</td>
</tr>
<tr>
<td>4.2 Training. Awareness, and Competence</td>
<td>Training program (general awareness plus job-specific training)</td>
<td>Annual awareness training; other training as required based on individual job descriptions, relationship of jobs to potentially significant impacts</td>
<td>Manager, Environmental Management/ Assistant Manager, Community Relations; Environmental and Social Management System Co-ordinators; Directors ensure adequacy of resources</td>
</tr>
<tr>
<td>4.3 Communication</td>
<td><em>Implementation of Public Consultation and Disclosure Plan and MP-04, “Management of Legal and Regulatory Requirements”</em></td>
<td>Ongoing</td>
<td>Director - Community Relations, assisted by Manager, Environmental Management/ Assistant Manager, Community Relations and Environmental and Social Management System Co-ordinators</td>
</tr>
<tr>
<td>4.4 Environmental and Social Management System Documentation</td>
<td>See below</td>
<td>See below</td>
<td>See below</td>
</tr>
<tr>
<td>4.5 Document Control</td>
<td>Management of web-based controlled document distribution system per MP-05, “Review, Ongoing</td>
<td>Manager, Environmental Management, with environmental department staff</td>
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<tr>
<td><strong>RMGC Environmental &amp; Social Management Plan Section/ Title</strong></td>
<td><strong>Major Implementation Actions</strong></td>
<td><strong>Frequency</strong></td>
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<td>approval, Controlled Distribution, and Update of Environmental and Social Management System Documents”</td>
<td>Ongoing</td>
<td>Managing Director, operational/functional Directors, and supervisory staff; assisted by Manager, Environmental Management/ Assistant Manager, Community Relations and Social Management System Co-ordinators</td>
</tr>
<tr>
<td><strong>4.6 Operational Control</strong></td>
<td>Implementation of mine planning/exploration planning activities per MP-14, “Mine Planning Process” and MP-15, “Exploration Planning”; implementation of other major environmental management plans and supporting procedures</td>
<td>Ongoing</td>
<td>Managing Director, operational/functional Directors, and supervisory staff; assisted by Manager, Environmental Management/ Assistant Manager, Community Relations and Social Management System Co-ordinators</td>
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<tr>
<td><strong>4.7 Emergency Preparedness and Response</strong></td>
<td>Implementation of <em>Emergency Preparedness &amp; Spill Contingency Plan</em>, RMGC <em>Occupational Health and Safety Plan</em>, other supporting management plans and procedures</td>
<td>Ongoing</td>
<td>Managing Director, operational/functional Directors, and supervisory staff; assisted by the Health and Safety Manager; the Manager, Environmental Management; the Assistant Manager, Community Relations; and all Environmental and Social Management System Co-ordinators</td>
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<tr>
<td>RMGC Environmental &amp; Social Management Plan Section/Title</td>
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<tr>
<td>5.0 CHECKING AND CORRECTIVE ACTION</td>
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<tr>
<td>5.1 Monitoring and Measurement</td>
<td>Implementation of <em>Environmental and Social Monitoring Plan</em> and supporting plans and procedures; implementation of MP-08, “Surveillance Inspection”; MP-09, “Regulatory Compliance Verifications”; and maintenance of the <em>Roșia Montană Environmental Database</em></td>
<td>Ongoing</td>
<td>Independent Compliance Management Team; Manager, Environmental Management and Environmental Department staff; Assistant Manager, Community Relations; Environmental and Social Management System Co-ordinators; and designated operational staff</td>
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<tr>
<td>5.2 Non-conformance Reporting and Corrective and Preventive Action</td>
<td>Generation of Corrective and Preventive Action Requests per MP-10, “Corrective and Preventive Action for Environmental and Social Management System Non-conformances” in response to surveillance inspections, compliance verification, systems verification, and management review processes</td>
<td>As needed</td>
<td>Manager, Environmental Management and Environmental Department staff; Assistant Manager, Community Relations; Environmental and Social Management System Co-ordinators;</td>
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<tr>
<td>5.3 Environmental and Social Action Program Records</td>
<td>Implementation of records management system described by MP-12, “Management of</td>
<td>Ongoing</td>
<td>Manager, Environmental Management and Assistant Manager, Community Relations</td>
</tr>
<tr>
<td>RMGC Environmental &amp; Social Management Plan Section/ Title</td>
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<tr>
<td>Environmental and Social Management System Records</td>
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<td>or their designees</td>
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<tr>
<td>5.4 Environmental and Social Management System Performance Verifications</td>
<td>Periodic performance improvement verifications per MP-12, &quot;Internal Environmental and Social Management System Performance Verifications&quot;</td>
<td>Annual (minimum)</td>
<td>Independent Compliance Management Team; Manager, Environmental Management and Assistant Manager, Community Relations or their designees</td>
</tr>
<tr>
<td>6.0 MANAGEMENT REVIEW</td>
<td>Implementation of comprehensive review process described by MP-13, “Management Reviews”</td>
<td>Annual (minimum)</td>
<td>Management Review Board, assisted by Manager, Environmental Management /Assistant Manager, Community Relations</td>
</tr>
</tbody>
</table>