



Environmental Policy

The Board of BMSC is committed to protecting the environment by applying sound environmental management practices that minimize environmental impacts from exploration through to decommissioning and closure.

We pledge to:

- comply with all host country environmental laws and regulations together with industry best practice standards or whichever is the more stringent of the two;
- commit the necessary resources to support and implement the company's environmental policy;
- establish and maintain an Environmental Management System (EMS) in line with ISO 14001:2004;
- be committed to continual improvement in environmental performance by developing environmental indicators, monitoring and auditing performance, and by implementing corrective actions where needed;
- report externally on environmental performance and encourage dialogue with employees, local communities and other stakeholders to promote environmental awareness;
- include environmental performance criteria in decisions on promotions, salary increases and awarding contracts;
- apply the principles of BAT (Best Available Technology) to environment management;
- reduce, re-use and recycle resources and implement proper waste management practices;
- train, motivate and ensure that all employees adhere to environmental protection and pollution prevention policies;
- incorporate an emergency preparedness and response system into standard operating practices; and
- monitor and report on performance through periodic audits.

Stan Rogers, *General Manager*, BMSC: _____

Date:



Health & Safety Policy

The Board of BMSC recognise that the safety and security of its employees and the communities in which it operates is an integral part of its business. We seek to create a mindset where people believe it is possible to work injury free, regardless of what role they perform.

Our guiding principles are:

- all injuries are preventable;
- our most important objective is safety and health;
- working safely is a condition of employment; and
- any task that can't be done safely shouldn't be done.

To ensure that these principles are adopted, BMSC will:

- train and motivate all our people to work in a safe and responsible manner;
- carry out risk assessment for all construction and operational activities;
- ensure that health and safety performances comply with relevant legislation;
- assist the local community in health awareness activities;
- establish and maintain a health & safety management system in accordance with the requirements of OHSAS 18001:2007;
- adhere to local laws as well as international standards on law enforcement in securing its operations, particularly those that relate to the use of force¹;
- carry out risk assessments in relation to security issues at each of its project sites; and
- ensure that security is managed in a way that respects and protects human rights, avoids creating conflict and addresses security threats in as peaceful a way as possible.

Stan Rogers, *General Manager*, BMSC: _____

Date:

¹The UN Code of Conduct for Law Enforcement Officials (http://www.unhchr.ch/html/menu3/b/h_comp42.htm) and the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (http://www.unhchr.ch/html/menu3/b/h_comp43.htm) are key in this regard.



Social Responsibility Policy

The Board of BMSC recognises that corporate success is predicated on communities sharing the benefits of project development. BMSC management will conduct the company's business activities to:

- conduct business within a framework that promotes worker and community health and safety, environmental protection, human rights, community involvement, community benefits and the quality of life for employees and their families;
- actively promote understanding by all BMSC employees, of culture, language and history of the communities, regions and countries in which we work;
- work to protect cultural heritage resources potentially affected by our activities;
- conduct activities in a manner that respects traditional-use rights, cultures, customs and social values;
- promote job equity and equal access to employment opportunities for women;
- build capacity by sharing environmental and social experiences and solutions with local communities and regional and national governments;
- actively consult with local communities to identify and resolve environmental and social issues;
- procure materials, goods and services in a manner that enhances local benefits and protects against unethical practices such as child labour and forced labour;
- establish social responsibility performance criteria; and
- monitor and report externally on performance through periodic audits.

Stan Rogers, *General Manager*, BMSC: _____

Date:



Employee Policy

BMSC holds its employees in the highest esteem and understands that their goodwill, loyalty and dedicated work effort is the key to the success of the Company.

The Company is committed to the creation of a work environment which helps and encourages employees to reach their personal and professional goals, as well as ensures the timely achievement of Company business objectives. In achieving the above objectives, BMSC will:

- establish a sound human resources policy framework which meets all aspects of the Eritrean Labour Law and international labour standards and conventions;
- ensure that conditions of employment adhere to the standards of freedom, security, equity and dignity;
- ensure that involuntary labour is not used by BMSC or its contractors, specifically the use of Eritrean National Service personnel on extended service;
- abide by minimum age laws and conventions and prohibit all forms of child labour;
- not discriminate against potential or existing employees on the basis of religion, ethnicity, gender or other factors;
- adopt recruitment procedures which facilitate the employment of people from the immediate Project area and local communities in the first place;
- ensure fair entitlements, benefits and remuneration, of a level which is in keeping with Eritrean norms and laws and enables BMSC to attract and retain employees;
- ensure effective employee administration and records management systems;
- implement mechanisms for the fair and consistent measurement of employee performance;
- provide avenues for the timely, confidential and appropriate resolution of employee grievances and complaints;
- foster a culture of teamwork and cooperation within BMSC and the development of strong relationships between employees across all departments;
- actively provide Company information to employees and consult with workers on issues that affect them;
- provide appropriate training to ensure that each employee has the required skills and knowledge to perform their allocated duties in a safe and competent manner; and
- continuously develop and improve human resources management systems, policies and practices.

Stan Rogers, *General Manager*, BMSC: _____

Date:



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Code of Conduct

BMSC is committed to maintaining good relations with its employees, neighbours and other communities potentially affected by the project. All employees, contractors and subcontractors will be required to uphold the highest Code of Conduct at all times. The scope of the Code of Conduct will be reviewed by BMSC management on a regular basis.

- **Health & Safety of Yourself, other Employees/Contractors and the Community:**
 - The Project has a zero tolerance to crimes and violence.
 - Use of force will not be tolerated and all disagreements must be resolved through appropriate legal channels.
 - Vehicles must be operated safely and in accordance with established speed limits in local communities.
 - No job should be undertaken if it is not safe to do so.
- **Private Property:**
 - Respect the private property of others.
 - Private property must not be removed, damaged or altered unless with the prior approval of the community and/or owner and as part of the agreed Project plan.
- **Natural Resources:**
 - Hunting wildlife is prohibited.
 - The carrying of firearms, explosives etc is prohibited.
 - Workers are forbidden to collect natural resources (e.g. plants or animals, geological samples etc) unless specifically authorised to do so as part of Project activities.
 - Cutting trees within the mine property is against Ministry of Agriculture regulations on tree protection and preservation.
 - Vegetation that is permitted to be cleared from construction sites is the property of local communities and the company has committed to provide these resources to the community as appropriate.
 - Workers shall dispose of waste in a responsible manner and in accordance environmental procedures.
- **Religious and Sacred Structures/Areas:**
 - Respect the religious shrines and burial sites and practices of the local population.
 - Do not disturb shrines and other religious monuments (adjust work program in order to avoid creating the need to disturb such structures).
 - Recognise that shrines and sacred sites may include trees, sheds, piles of pebbles, and piles of offerings.
 - Follow BMSC project procedures if chance finds are encountered.
- **Alcohol and Illegal Substances:**
 - An Alcohol and Substance Abuse Policy is in place for the Project.
 - Alcohol consumption is discouraged.
 - No illegal substances may be consumed at any time, and the use of medicines must be

authorised by the site doctor or nurses.

- Random drug testing will be done.
- **Avoid Micro-economic Distortion:** Avoid over-payment for goods and/or services by agreeing any payment in advance, keeping in mind that locally accepted prices for goods and services are likely to be considerably lower than in cities and other areas of Eritrea. Goods and services acquired by company personnel from community members must be paid for “on the spot” not on “credit”.
- **Community Goodwill vs. Opportunity Seekers:** Respect the goodwill of the community; however care should be taken to not take advantage of this goodwill. Employees and contractors are encouraged to return the gestures of goodwill, at their own discretion, however this needs to be balanced with the potential to create expectations that goodwill will be met by payment.
- **Religious / Traditional Days of Celebration:** Respect the religious and/or traditional days of celebration and their restrictions (as advised by the community relations team).
- **Respect Community Members and the Traditional Leadership:** Any contact with community members shall be conducted in a manner commensurate with the traditional culture of the area.
- **Respect requests of Community Leaders:** Any request / issue raised by community leaders shall be directed to the Community Liaison Officers or other member of the community relations team. Any complaints shall be treated under the procedure defined by the BMSC Stakeholder Engagement Programme.
- **Harassment:** Harassment of any kind will not be tolerated from personnel engaged with the Project. Harassment may take many forms including religious and ethnic slurs, jokes, statements, gestures, impeding another’s movement, culturally offensive writing or pictures, and unwelcome sexual advances or conversations.
- **Security:** Workers must carry appropriate identification at all times and there will be no access to site by non-authorised personnel. Workers must be willing to produce identification upon request.

Stan Rogers, *General Manager*, BMSC: _____

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