

Vedanta Limited

Sustainability Governance System

Guidance Note GN 40

External Stakeholder Engagement



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1 INTRODUCTION

1.1 WHO IS THIS GUIDANCE NOTE AIMED AT?

This Guidance Note (GN) is aimed at all Vedanta subsidiaries, operations and managed sites, including new acquisitions. This GN is applicable to the entire operation lifecycle.

1.2 WHAT IS THE AIM OF THIS GUIDANCE NOTE?

To build strong and trusting relationships with stakeholders, recognising that the engagement of external stakeholders is key to long term relationships that can support our businesses and provide the social license to operate. Without this, any business may be at very high risk of suspension or even closure without warning.

This aim of this Guidance Note is to provide the tools needed to support the implementation of the Vedanta External Stakeholder Engagement Standard.

1.3 WHAT ISSUES DOES THIS GUIDANCE NOTE ADDRESS?

Core implementation elements and guidance required by the External Stakeholder Engagement Standard.

1.4 HOW SHOULD THIS GUIDANCE NOTE BE USED?

This Guidance Note is mandatory, reflecting good practice and providing the basis for continual improvement of sustainability issues across the Vedanta business. The need for flexibility at a site depending upon specific circumstances or regulatory specific requirements is also recognised. This Guidance Note is not designed to be definitive text, nor is it designed to provide prescriptive methods and procedures for undertaking tasks.

In certain cases, there will be national and / or local regulatory requirements. Businesses must ensure identification and compliance with these requirements.

The successful implementation of this Guidance Note is expected to require dedicated commitment from all Vedanta sites.

2 STAKEHOLDER MAPPING

The first step in engagement planning is to map out the stakeholders who may influence or impact the business. Annexure 1 provides a guide to undertaking a stakeholder mapping and analysis and provides an example of a stakeholder map. Annexure 2 provides an example of an overall engagement plan.

The core elements of stakeholder engagement planning are:

- Providing clarity on the activities to be covered
- Identifying all stakeholders regardless of influence or significance so that none are missed
- Identifying the degree of influence those stakeholders may have on the project
- Identifying the key interest points and matching these with the key stakeholders to ensure proper coverage of possible concerns
- Providing consideration of the level of stakeholder participation that is likely

Once the overall Stakeholder Map has been laid out, including consideration of the interest and influence of each stakeholder group, a detailed stakeholder engagement plan is required. Annexure 2 provides an example of such a plan. Each business or project should conduct this exercise to develop the detailed engagement plan and prioritise the engagements, thus allowing a detailed plan of frequency and depth of stakeholder engagement depending on the stakeholder group.



3 SOCIAL RISK ANALYSIS

The social risk analysis is required to identify any risks that may impact the organisation as a result of social concerns or performance. Annexure 3 provides a guide to conducting a social risk analysis and includes an example of a social risk register.

The analysis and register identify foreseeable risk events and prioritised prioritise based on their risk to the organisation. As with any risk assessment, the purpose of this process is to identify the controls that must be put in place and the process of measuring, monitoring and reporting on the effectiveness of those controls. Tools to help in this process and a register covering criteria on the effectiveness of controls, consequences and likelihoods are provided in Annexure 3.

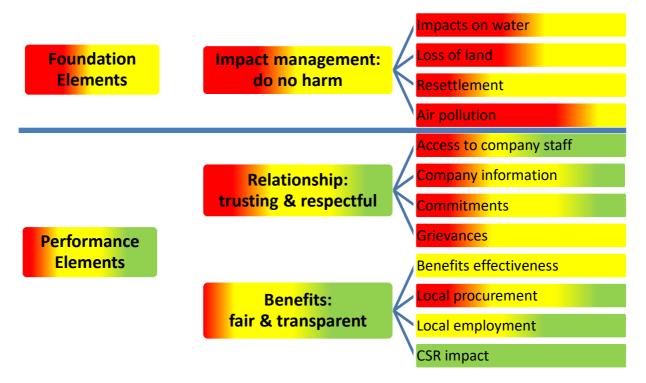
4 SUMMARY OF STAKEHOLDER MAPPING AND SOCIAL RISK ANALYSIS

The overall purpose of stakeholder engagement and social risk analysis is to ensure:

- 1. An unwavering approach to "do no harm"
- 2. Consistency in relationship building and adding value
- 3. Define Social Performance success
- 4. Emphasis on impact mitigation and relationship building
- 5. An adaptation in corporate culture, similar safety culture effort
- 6. Implementation of all elements of the management system

Importantly, it is critical for businesses to recognise that CSR is not Social Performance and does not give a Social License to Operate (SLO). CSR is an important element of SLO, and the diagram below shows this interrelationship. There are noteworthy points when using this diagram:

- a) If the Foundation Elements are not in place, the Social License to Operate will be at serious risk.
- b) The SLO risk and negative impacts may occur with little or no notice.
- c) Excellence in the Performance Elements does not overcome significant failings in the Foundation Elements. For example, a best in class CSR programs is no guarantee of SLO if Foundation Elements are compromised.
- d) Undertaking an assessment of the sixteen elements on the right-hand side of the diagram and plotting an equivalent diagram at each business will help identify the important areas to be addressed.





5 UNDERSTANDING AND MANAGING COMMITMENTS

A common source of conflict with stakeholders, particularly local communities, is fulfilling commitments that can be made overtly or implied. Annexure 4 provides a template for a commitment register including monitoring, recording and responding to commitments.

It should be noted that even a simple statement from official of the company can be perceived by local stakeholders as a firm promise and can create significant problems we're not fulfilled. It is therefore important in addition to managing firm commitments to also to be very aware of how expectations of stakeholders can be inadvertently raised.

6 SUPPORTING TOOLS

The spreadsheets below are designed to assist in the implementation of the Stakeholder Engagement Performance Standard and this Guidance Note.





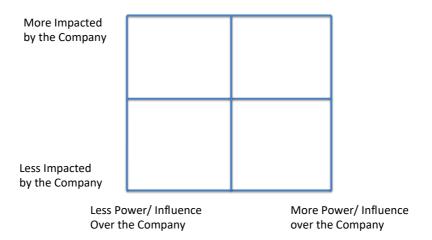




ANNEXURE 1 Guide to Conducting a Stakeholder Mapping & Analysis

Steps

- **1st.** Identify the activity or issue to be analysed e.g. Construction of a new well pad, 3D seismic, or road marshal hiring and employment. If this is the first time you are doing this exercise you may want to consider all of the company's activities and issues in order to create a master map. Or you can create a map per issue or activity.
- 2nd. Identify all possible stakeholders, regardless of their significance and whether you already are in touch with them. You can remove the less important ones later. Write the name of each stakeholder or stakeholder group (youth, elders) on a sticky note. Use one sticky note per stakeholder.
- 3rd. You can use different coloured sticky notes to identify if stakeholders have a positive attitude towards the company, a negative attitude or are neutral. If you do not have coloured sticky notes, write a ++ (positive), -- (negative) or +/- (neutral) after the name of the stakeholder.
- 4th. Draw a stakeholder grid on a whiteboard or a large sheet of paper, as per the following diagram:

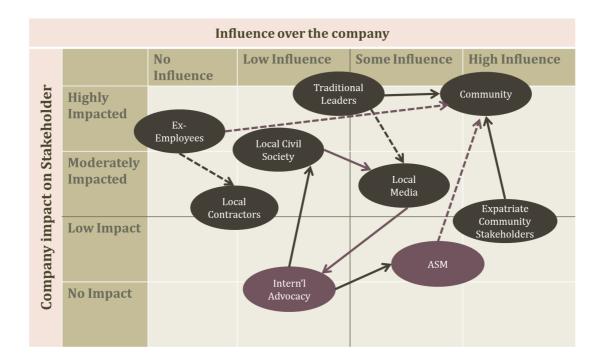


- **5th.** Place the sticky notes or pieces of paper in the appropriate square on the stakeholder grid. There are four possibilities:
 - a. Stakeholders that have much power or influence over company activities and are highly impacted (top right);
 - b. Stakeholders that have little interest or are less impacted by company activities but have much power/influence over company activities (bottom right);
 - c. Stakeholders that are highly impacted or have much interest in company activities but have little power/influence over the company (top left);
 - d. Stakeholders that have little interest in company activities and have little power/influence over the company (bottom left).
- 6th. Discuss as a group the placement of the various stakeholders on the map and move them accordingly until consensus is achieved. Those stakeholders who are deemed not relevant should be placed at the side of the matrix, but not discarded at this point.





7th. The group will then draw lines between the stakeholders to indicate the existence of a relationship between them. Use a line with an arrow to indicate that the influence is one-way or a line with two arrows to indicate that the influence is in both directions. You might also use a dotted line to show a weaker relationship between two stakeholders. This analysis should show you the stakeholders the company should engage with, either because they have direct power/influence over the company, or, alternatively, because they can influence key stakeholders who do have direct power/influence.



As you work through the analysis as a group, consider the following:

- Are there any unexpected stakeholders? Which ones did not seem as important at the beginning but now appear to be important?
- o Is it true that stakeholders that are less impacted and have little power don't have much influence or has it become clear that some 'unimportant' stakeholders appear to have much influence in the background over 'important' stakeholders?
- Are we engaging with the stakeholders that are easy to reach but all fall in the lower left corner or do we engage with those that matter (more)?



- 8th. Now that you have identified your key stakeholders, prepare a stakeholder analysis matrix. Begin the analysis with the primary stakeholders and fill in the categories appropriately. The categories can be changed if needed to fit the activity or issue for which you are conducting this analysis.
 - Identify the stakeholder (individual or group).
 - Describe if the stakeholder has a positive (+), a negative (-), or a neutral (+/-) attitude towards the company.
 - Describe if the stakeholder is a) a decision maker; b) an influencer; c) an interest group or; d) a spoiler.
 - Describe what other stakeholders are influenced by this person or group.
 - Note the positions & interests of each stakeholder (**Position** = what people say they want; **Interests** = underlying reasons or needs behind a position).

| Stakeholder | Attitude | Profile | Influence on | Interests |
|-------------|----------|---------|--------------|-----------|
| | | | | |
| | | | | |

- 9th. Write the information on index cards and place them in the appropriate column. Again, this task can be sped up by dividing the different stakeholders among the group. These are then reviewed and rewritten by the group until there is a consensus about the information represented. Alternatively, you can project a spreadsheet onto a screen and fill in the information directly onto your computer.
- 10th. From the matrix, design a preliminary strategy to respond to stakeholder concerns. In this strategy, describe the actions that are needed (who, where, when and how) to design either a one-off campaign or an annual plan, depending on whether this analysis has been conducted for the whole project or for one issue.

Pay attention to how specific engagement activities might encompass several stakeholders, as well as the relationships among the stakeholders. Not every issue or activity requires the same level of participation. Furthermore, not every stakeholder should be approached the same way. For each stakeholder determine the level of participation required to manage that relationship.

Levels of Stakeholder Participation:



Ensure that stakeholders are aware of what is happening in project-activities, challenges, opportunities

Seek out and consider the stakeholders' feedback on the project's activities, impacts, policies or practices

Work directly with the stakeholders on relevant matters to ensure that their interests are accounted for

Stakeholders share responsibility with the management team in the planning and decision-making of relevant aspects of company activities.

Enable the stakeholders to the lead in planning and decision-making on matters relevant to them.



Additional Considerations:

- Preparing the map is an easy way to visualize the web of relationships that confront a company in respect to its project. It should be redone periodically to assess company progress. It might be found, for example, that as your understanding of the area increases, those stakeholders who were put to the side in the initial analysis might need to be slotted into the matrix.
- The mapping is particularly important to understand the relationships among the different stakeholders. This will be crucial in the design of the strategy that the company develops to respond to stakeholder concerns.
- This methodology is very efficient, in terms of cost and time, compared to the more traditional large-scale, indepth anthropological studies.
- Using sticky notes at the beginning allows the stakeholders to be moved around until a consensus is reached as to where they should be finally located. Simply drawing a circle with a marker does not allow this.
- > One possibility is to do the mapping and analysis with company personnel and the key stakeholders themselves. This would provide the most accurate information of the situation facing the company.
- ➤ A limitation of this methodology is that some of the information may not be immediately available and, therefore, the outcome is based solely on the perceptions of the people doing the analysis. Whenever there is some doubt about information, the company will have to devise other means of validating it.



ANNEXURE 2 Stakeholder Engagement Plan – Example

Definitions

Inform Ensure SHs have all relevant info

Consult Seek & consider SHs feedback

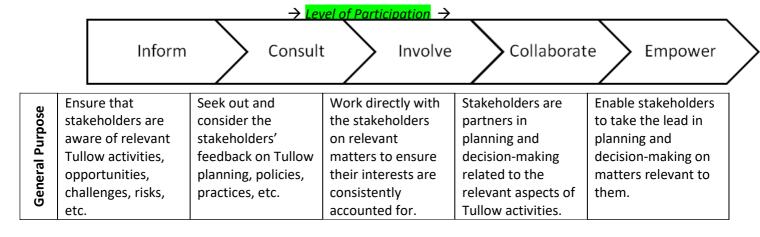
Involve SHs are included; interests integrated

Collaborate SHs partner in planning/ decision-making

Empower SHs lead in planning/ decision-making

Process Overview

Social Performance Handout
The Engagement Spectrum (based on IAP2)





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| | | | Sta | keholder Engag | ement Plan Exa | ample | | | |
|---|---------------------------|---------------------------------|------------------------|---|------------------------------------|-------------------------|---|--|---|
| Relevant stakeholders | Perception of the Company | Stakeholder Interest | Engagement Level | Specific Purpose | Venue | Responsible | Frequency of engagement | КРІ | Other Actions Required |
| NGO | Neutral/ Negative | Influence Societal Change | Consult/Involv e | Inform, and being perceived as trying to inform them Collaborate around a shared agenda | Neutral space such as a hotel | Comms | 4/year | Change in tone about public statements about company Being invited to NGO meetings | |
| Local Admin (8 chiefs) + elders + paramount chief | Neutral | Being respected | Inform | Project Update | In their office | Comms | 2/year each chief 1/year all chiefs invited to office | Verification that they have the correct information | |
| National Gov. Dpt. Head Lands | | | | Help them to do their job | r job In their office | | 2/year | | |
| National Gov. Dpt. Head Water | | | | | | Government Relations | 2/year | | |
| National Gov. Dpt. Head Youth and Planning | Neutral | Following Gov. Policy | Involve Collaborate | | | | 2/year | | |
| National Gov. Dpt. Head Energy | | Change agents | | (better) | | | 2/year | | |
| National Gov. Dpt. Head Education | | | | | | | 2/year | | |
| National Gov. Dpt. Head Roads | | | | | | | 2/year | | |
| Town Administrator | Neutral | Being recognized as leader | Inform | General awareness | Company office in town | Comms | 4/year | Accepts invitation | |
| Former Employees | | | | | Keep them connected to the company | | | Send then SMS in case of vacancies. Office used as employment improvement office | Needs a more comprehensive strategy for engaging with ex-employees |

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| | | | Sta | keholder Engag | ement Plan Exa | ımple | | | |
|------------------------------|---------------------------|--|---------------------|--|------------------------|--------------------------------|--------------------------|-----|---|
| Relevant stakeholders | Perception of the Company | Stakeholder Interest | Engagement Level | Specific Purpose | Venue | Responsible | Frequency of engagement | КРІ | Other Actions Required |
| Business community | Neutral | Fair distribution of local content | Inform | Keep informed about national content policy and contracting opportunities | Company office in town | Comms + National Content | 2/year contractor day | | |
| Educational institute | Positive | Being seen as credible | Collaborate | Ensure that youth has better opportunities to capitalize on future jobs | | Comms | 2/year | | |
| Religious organisation | Positive | Development Education | Empower | Gain advice from them Listening to local perceptions | In their office | Comms | 2/year | | |
| Local radio station | Neutral | Income | | | | | 4/year Media | | Need to have a |
| Local bloggers | Neutral | Income | | | | | Update | | comms plan |
| Secondary Schools (clubs) | Neutral | Information | Inform | Offer information in systematic way through a larger group of community member | Company office in town | Comms | Upon request | | Develop a school program open to any school that requests |

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ANNEXURE 3 Guide to Conducting a Social Risk Analysis

A social risk analysis is the process of identifying and analysing social risks to the business. A social risk analysis is different from a social impact assessment, which identifies (potential) risks to communities. Obviously however, if the impacts on the community are not well managed, they can become a social risk to the company.

Definitions:

A risk assessment allows us to analyse actual and potential risks as well as prioritize which ones need to be addressed first.

There a few elements of the risk analysis that need definition:

- A risk is an action that can cause harm or impact the company (this is what are we
 worried about). For example: the risk of public demonstrations because people feel that
 the company has not fulfilled its promises.
- An event is the action or decision that may trigger the risk. For example, this can be a rig move or a redundancy process.
- A cause or driver is the underlying reason for the risk; the root cause.

The risk level or seriousness of the risk is determined by two factors:

- 1. The likelihood that the risk will occur.
- 2. The consequence for the company if it occurs.

We assess both likelihood and consequences based on a risk table that provides definitions for different levels of likelihood and consequence.

Social risks and mitigation measures to address those risks should be documented and tracked within a Risk Register which is updated regularly.

Social Risk Analysis Steps:

1. Preparation

- 1.1. Make sure that participants in the social risk analysis have different perspectives and backgrounds. Ideally the social risk assessment should have cross-departmental participation.
- 1.2. It typically is useful to 'prepare' participants for the workshop by having one-on-one conversations and to brainstorm about possible risks that should be identified. Such preparation may trigger other ideas and thoughts amongst participants in advance of the analysis.
- 1.3. Make sure to bring hard copies of the risk table that you will use to assess likelihood and consequence to the risk analysis exercise.

2. Identification

2.1. Identify all possible social risks and risk events. Social risks may be contextual – that is, they are related to the environment in which the company is operating and are not a direct result of company actions. Or they may be directly related to the company's presence, policies, activities and actions.

Think through possible drivers or sources of social risk:

Are commitments being met?



- Are community expectations being met?
- Could community or individuals' interests be harmed by company presence, policies, or activities?
- 2.2. Be aware that one event can be associated with multiple risks. Or, alternatively there can be one risk that is associated with multiple events (e.g. layoffs by contractors may all cause the same risk).
- 2.3. Assess how the risks identified are related to each other. Can any be grouped together? Do you notice any patterns?
- 2.4. Next, think about the drivers that cause the risk. This is important as the risk simply is the manifestation, but the driver is the root cause. In other words, if we want to mitigate the risk, we should address the root cause.

Risk Action Plan Example:

| Event # | Risk Date | Potential Risk Event | Risk | Driver/ Cause | Location | likelihood (1-5) | severity (1-5) | Risk Rating | Responsible for Managing |
|------------|--------------|----------------------------|--|--|----------|---------------------|-------------------|----------------|--------------------------------|
| 1 | Apr- 17 | General Elections | Demonstrations against company based on incorrect information | Lack of relevant/right information | Lodwar | 4 | 4 | 16 | SP |
| 2 | Apr- 17 | Local Content policy | Incitement of communities by politicians whom are paid by contractors who are upset with the company | Company seen as not pursuing its own Local Content policy | Lodwar | 3 | 4 | 12 | National Content |

3. Assess Risk Level

- 3.1. For each risk identified, assign a risk level. The risk level is determined by the likelihood of the risk occurring, and potential consequence (severity) of the risk if it were to occur. It is important to assign a risk level to each risk in order to prioritize those risks which are most critical.
- 3.2. How likely is the risk event? Rate the chance of the risk event occurring on a scale of 1-5, with 1 being "very unlikely" and 5 being "very likely."
- 3.3. If the risk event were to occur, what would be the consequences of that event? How severe would the impacts be? Consider socio-economic, reputational, safety, security, health, social, and financial impacts. Rate the severity of the potential consequences on a scale of 1-5, with 1 being "negligible" and 5 being "catastrophic". Most companies will have more specific descriptions of consequence levels related to reputation, environment, costs, and community support (usually found in the risk table).
- 3.4. Determine the risk rating using the following table. For example, a risk event with a low likelihood of occurring (e.g. "very unlikely") and a "minor" potential consequence, would be assigned a LOW risk rating. A risk event that has a high likelihood of occurring (e.g. "very likely") and where the severity of the consequence would be "serious loss" would be assigned a HIGH risk rating.



Risk Table:

| | | | Potential Consequence (Severity) | | | | | |
|------------|---------------|------------|----------------------------------|--------------|------------|--------------|--------|--|
| | | Negligible | Minor | Serious Loss | Major Loss | Catastrophic | | |
| | | | 1 | 2 | 3 | 4 | 5 | |
| _ | Very Unlikely | 1 | LOW | LOW | LOW | LOW | LOW | |
| 000 | Unlikely | 2 | LOW | LOW | LOW | MEDIUM | MEDIUM | |
| i. | Possible | 3 | LOW | LOW | MEDIUM | MEDIUM | HIGH | |
| Likelihood | Likely | 4 | LOW | MEDIUM | MEDIUM | HIGH | HIGH | |
| | Very Likely | 5 | LOW | MEDIUM | HIGH | HIGH | HIGH | |

4. Action Plan

4.1. Once all social risks have been identified and assigned a risk rating, an action plan to address the risks must be developed. How the risks are addressed depends on the risk rating assigned to it – those with the highest ratings should be prioritized.

For specific events which are a source of social risk, companies can use the following approach to risk management:

| Low risk events | Event-related risk management actions to be managed through |
|---------------------|---|
| | Actions in Supervisor Weekly Plans. |
| Medium risks events | Event-related risk management actions to be managed through |
| | Actions in Supervisor Weekly Plans. |
| High risks events | Requires Event-specific Risk Management Plan. |

Not all social risks will be related to specific events, but an action plan should be developed for all identified social risks.

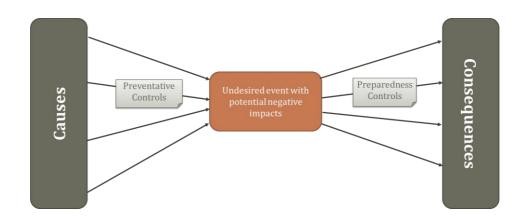
- 4.2. The action plan should describe specific actions taken to address the risk; these may be preventive or mitigation actions.
 - **Preventive actions** are designed either to eliminate or avoid the risk or to reduce the risk as much as possible.
 - **Mitigation actions** are designed to mitigate or lessen the impacts of the risk event once it has occurred.
 - The most effective method for addressing a risk is to avoid or eliminate it this should be done wherever possible.
 - If it is not possible to avoid or eliminate the risk, action should be taken to reduce the risk or mitigate the impacts of the risk.
 - The last possible action is to compensate for the impacts of the risk event. Compensation should be considered a necessary last step if the risk is unable to be avoided or reduced, or if the impacts are not able to be sufficiently mitigated. Wherever possible, action planning should aim to eliminate, avoid, and reduce risks as first priorities.



The following diagram outlines the "Hierarchy of Control" for addressing risks:



4.3. A bow-tie analysis can also be used to gain a more in-depth understanding of the causes and potential causes of a certain social risk. Once the causes of the risk event have been identified and understood, preventive controls to avoid or eliminate the risk can be determined. Once the potential consequences of the event are identified and understood, preparedness controls can be put in place. Preparedness controls may have an element of preparation, or they may be intended to mitigate (lessen) the consequences.



- 4.4. It is essential that one individual or department is responsible for managing the risk mitigation actions and the timeframes/deadlines for action. Some companies call this the Risk Owner or SPA (Single Point of Accountability).
- 4.5. Progress against the preventive and mitigation actions should be tracked in the action plan, with an example shown below.



SOCIAL RISK MITIGATION ACTION PLAN

| Event | Risk | Source(s) of Risk | Mitigating Actions | Tasks | Assigned to | Finish date | Result Y/N/P |
|-------------|--------|-------------------------------|---------------------------------|---|-------------|-------------|--------------|
| | | Lack of jobs | Clarification of jobs available | DM to call GT To discuss if jobs can be offered | DM | 04- Jun | |
| | | related to well pad | Communication / Engagement | Develop messages around the reality of a contracting business | JO/DP | 04- Jun | |
| | | | Engagement ex-staff | Meet employees and explain retrenchment package | FSSE | 04- Jun | |
| Drill Pad | Delay | | | Contact MP + inform about public meeting | FT | 13- Apr | |
| Land Access | Access | Anger | Outreach to politicians | Visit District leader + lobby | GPA | 16- Apr | |
| | | over lay- offs of staff | | Visit Mayor + lobby | GPA | 16- Apr | |
| | | | Outreach to community | Discuss Public Meeting with Ass. Chief | SP team | 14- Apr | |
| | | | Prepare Public | Mobilize for actual meeting | SP team | 15- Apr | |
| | | | Meeting | Public Meeting | SP team | 17- Apr | |



ANNEXURE 4 Commitments Register

Social Performance Toolbox Session on Expectation Management Don't Raise Expectations: Saying "No"

The Issue

- Sometimes the community asks us for things that cannot be provided, and businesses need to say "no"
- If not, expectations will be raised that may not be possible to achieve
- There are many ways by which communities are given the impression that we said "yes" "Let me think about it"

"Have patience"

"Let me get back to the company"

"Maybe in the future"

Results

Responding like this raises expectations in the community, when we could be re-setting expectations to be more realistic by giving good, accurate information.

As a company, we lose credibility in the eyes of the community, who argue that the company cannot be trusted, does not follow through on commitments and is inconsistent.

As a practitioner, we lose credibility with external stakeholders when they find out that we were not able to deliver disappointing news. We run the risk of being bypassed by community members who now want to talk to our bosses to figure out what really is going on. With our colleagues we lose credibility as we are seen as being able to effectively engage and mitigate social risk.

Why we keep doing it

We confuse being 'liked' with 'being respected' forgetting that respect comes from being honest and from being predictable.

We do not know how to say "no" in a manner that is perceived as respectful.

We allow ourselves to have a discussion around positions without being able to have a discussion around underlying interests.

Options

1. Show honesty and explain the company interests

Your way to open the discussion is to explain that that it is not in the best company interest to make false promises and, instead, that you want to hold yourself to the same standards of honesty as you expect from the community. Provide the reasons why we cannot meet their request. Often, if we give clear reasons as to why the company cannot do something, the community will understand.

2. Practice –through role play- being explicit without using the "no" word.

In some contexts, the word "no" could come across as confrontational and disrespectful. If that is the case, find alternative language that would make the company position clear but without using the "no" word. In most cases, we know fairly well when questions will come up and around what issues. In such cases, practice possible responses with colleagues and make sure to be prepared.



3. Focus on underlying interest of people and focus on addressing these

In most cases, a "no" response indicates a stated position such as a demand or request. The problem with stating positions is that we only can respond by saying "yes" or "no." Positions are different from interest in that positions state wants whereas interests are about underlying concerns, fears and hopes. Understanding the underlying interest of people that drive their demand or position offers many more opportunities to address the underlying cause behind the demand. You find out interests by asking "Why is that (demand) important to you?" and you will probably have to ask the why question as few more times. It is an effective manner to understand what is really driving certain behaviour.

4. <u>Use Analogies</u>

Link the reason why the company cannot do something to a real-life example that people can relate to:

"If you ask people to help you butchering an animal or to help you build a house, when the job is done, so you still pay them?"

"You have role division in a company the same way you have a role division amongst pastoralists. Some people look after the camels, some after the livestock and some after the baby animals. That means that when the baby animals grow up, they get promoted to the larger group and the person who used to look after the baby animals no longer has a job. It is the same with a company"

"Mining goes through cycles, the same as the seasons. You have dry seasons, small rains and big rains. When there are big rains in a company, there are plenty of jobs. But then there are also dryer seasons"

5. <u>Provide details of what is required and let people draw their own conclusion that they cannot do the job</u>

Rather than to say "no" another possibility is to explain what criteria a person or company needs to fulfil to get a contract or job. This includes the education, administrative procedures, quality of deliverables etc. Such an explanation often makes people realize there is little chance they meet these criteria and it will help adjust their expectations.

6. Refer to other organizations or sources that can help communities

Sometimes, it is possible to refer communities to institutions such as the Municipal government. Where possible, offer to help communities how to get access to such resources, for example by helping to draft letters.

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A Commitments Register spreadsheet is provided and below is the summary of the steps required.

Goals of the Commitments Register:

- 1. Rapid response time to internal and external inquiries about Company Commitment(s).
- 2. Ease of reviewing and tracking Company Commitments.
- 3. Decrease in the level of confusion with respect to Company Commitments.
- 4. Help eliminate duplicate Commitments and consolidate similar or same commitments

| Registers | |
|--------------------------------------|--|
| Compliance Commitment | Typically made in official documents that support the granting of formal licenses, such as an ESIA, contracts with Lenders, etc. For example: "Company will commit to drafting a complementary resettlement management plan" |
| Voluntary Benefits Commitment | Promises that are made related to community projects, donations, employment and contracting opportunities |
| Voluntary Administration | |
| Commitment | Typically, a promise to follow up on something to finalize a discussion or meeting |

| Data Entry: | |
|--|--|
| Definitions of Headings | |
| Commitment ID # | The number assigned to each Commitment and used in other documentation or communications when needed. |
| Source | Select the appropriate source from the drop-down menu, i.e. legislation or regulation, ESIA, RAP, etc |
| Reference Page, Clause # | Give the page number and section number of the commitment. |
| Citation | Commitment made externally in documentation, presentation, speech, etc. by an authorized person (refer to Promises and Commitments Procedure for authorized persons). Quoted from Reference, if possible |
| Required Action | Describe the action required to fulfil the commitment |
| Required Completion Date | Date when this commitment must be fulfilled - either stated in document OR the commitment is ongoing for the Life of Mine (LOM). |
| Action Plans - Definitions of Headings | |
| Single Point Accountability | Name of the individual assigned accountability to ensure the action is completed |
| Action Assigned to | Name of the individual assigned to do the work to complete the action |
| Support Team | Name of individuals or teams assigned to assist to complete the action |
| Priority | Ranking among all open actions |

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| Task Type | Indicate if the task to address this commitment occurs regularly by selecting from the menu. |
|--------------------------------------|--|
| Start Date | Enter the date that ACTION to address this commitment has or will be started. (This is NOT the date the commitment was made.) |
| Completion Date | Enter the expected completion date of the action(s), if it is an ongoing action for the Life of Mine |
| State | Regularly check progress, including the Lead Date, and flag the task accordingly by selecting an option from the menu. |
| Explanation of Current State | Give an explanation of the status, especially if the action plan is behind schedule. For a closed task, give a brief statement of how the obligation was fulfilled, i.e. 'completed action plan' or if the actions went above and beyond the action plan, describe here. |
| Recovery Plan | Steps to be taken to bring commitment back on track |
| Completion Evidence Document Name | If the commitment is being addressed by a particular strategic plan or program (i.e. "Stakeholder Engagement Plan" or "RAP" or "Social Risk Action Plan"), give the document name and version here. If other means are being used to action a commitment but not documented (yet), i.e. a task force, working groups, etcetera, give that information. |

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