

2022

Sustainability Report

Sustainability is at the heart of what we do



**GERALD
GROUP**

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MML Overview (as of 31 December, 2022)

2,612 employees (direct and indirect)	2.05m metric tonnes (mt) produced in 2022
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70 hectare regenerative farm project (pictured on cover)	3.25m metric tonnes (mt) annual production capacity
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Climate

44% physical intensity (tIO/tCO ² e) reduction target for Scope 1 emissions by 2030	79% physical intensity (tIO/tCO ² e) reduction target for Scope 1 emissions by 2050
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See page 11 for absolute emissions reduction target

Health & Safety

1,619 toolbox talks (group discussions to promote a culture of safety) held in 2022	0 fatalities
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Transparency

\$7.35m
USD paid to public sector
stakeholders in 2022

Our People

18%
female
employees

Community and Economic Development

100% growth in employment in 2022	17,524 man-hours of training for staff in 2022
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\$1.7m
USD for MML’s
Community Development
Fund due in 2023
(1% of 2022
free-on-board revenue)

12
community
meetings in 2022

References to Marampa Blue™ and ‘iron ore’ indicate iron ore concentrate
All production statistics are in dry metric tonnes

A subsidiary of Gerald Group, Marampa Mines Limited (MML) is engaged in the exploration, development and production of high-grade iron ore concentrate, branded as Marampa Blue™, in the Port Loko district of Sierra Leone. Gerald Group is investing in MML to build a resilient and long-life iron ore mine by integrating mining, processing and export logistics. MML seeks to create in-country value and play an integral role in the economic development and social stability of the region and country as a whole.

About this Report

MML’s sustainability objectives are aligned with and contribute to the United Nations Sustainable Development Goals (SDGs), which were adopted in 2015 and are intended to be achieved by 2030. MML is committed to this global partnership. We link our material topics covered in this reporting to the SDGs.

Reporting Framework

This Sustainability Report was prepared in reference to the Global Reporting Initiative (GRI) Sustainability Reporting Standards. A content index outlining our disclosures can be found in [Gerald Group’s 2022 Sustainability Report](#).

Our carbon emissions reporting, methodology and statistics were developed with the GHG Protocol Corporate Standard¹ and the GHG Corporate Value Chain (Scope 3) Standard². Following guidance on Global

Warming Potentials (GWPs) from the Intergovernmental Panel on Climate Change’s Fourth Assessment Report, we consolidate all applicable GHG categories into a carbon dioxide equivalent (CO2e) metric.

Report Boundaries and Scope

Data presented in this report is for fiscal year 2022 (FY22) reporting period (1 January to 31 December, 2022), unless otherwise specified. The 2022 reporting period establishes MML’s baseline/benchmark, except for carbon emissions data, for which 2021 is our baseline.

Excluded categories within Scope 3 are immaterial to our operations. We omitted categories 8: Upstream Leased Assets; 13: Downstream Leased Assets; and 14: Franchises, as we did not lease any upstream or downstream assets, nor did we operate under a franchise model for the reporting year.

United Nations Sustainable Development Goals (SDGs)



¹ Greenhouse Gas Protocol: Corporate Standard
² Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

Chief Operating Officer Statement



“In the coming years, MML will expand production output, install renewable energy generation to power the operation, lower our carbon emissions, create jobs and business opportunities locally, and invest in our employees and primary host communities to improve local quality of life dramatically.”

The story of Gerald Group’s involvement with the Marampa iron ore project is one of commitment and overcoming challenges. It shows our unwavering determination to build a sustainable and resilient iron ore project that benefits all our stakeholders – especially our primary host communities and the people of Sierra Leone.

Our relationship with the project started in 2014 with Gerald Group as a financier and offtaker. Our involvement, however, turned into a major challenge when the operation, for the fourth time in its history, failed again. Nevertheless, we stepped in, funded a ‘care and maintenance’ programme, and studied how we could revive Marampa. In March 2017, Gerald was awarded a Large-Scale Mining Licence (MLA) from the Government of Sierra Leone (GoSL) and MML’s predecessor, ‘SL Mining’, was incorporated. We reconfigured the project, and production and export under SL Mining successfully restarted in 2019, only to be halted again that year after GoSL moved to ban exports of Marampa shipments. With our entire venture at stake, Gerald Group took the dispute to arbitration with the International Chamber of Commerce. In 2021, we reached an out-of-court settlement, allowing us to restart operations under the new banner ‘Marampa Mines Limited’. Under the new agreement, GoSL became a shareholder with 10% equity in the project and the mining concession was expanded, nearly doubling the size of the mineral resources.

Although we faced extraordinary circumstances, we persevered and continue to build a sustainable and resilient iron ore operation, and this principle has driven our strategy and our decision-making throughout the whole endeavour. Sustainability is our core operating and design principle in that we build and operate *to last*. All our activities are designed to contribute to our ambitious sustainability goals, which are focused on value generation and positive outcomes.

I am extremely proud of our operation for two main reasons. First, we have configured MML to produce Marampa Blue™, which at 65% Fe is among the highest-grade iron ore products in the world. Our high-grade ore commands a price premium over lower grades and reduces carbon emissions downstream in the steel value chain. Second, we are the first mining company in Sierra Leone to allocate 1% of free-on-board export revenues directly for community-driven development projects, a much higher contribution than originally mandated by law and now the blueprint for all future MLAs. Our Community Relations & Development initiatives are why MML stands apart from prior operators of the Marampa project. We are determined to propel meaningful and sustainable advancement for our primary host communities and Sierra Leone at large.

Looking to the future, I am filled with hope for the promise of Marampa. In the coming years, MML will expand production output, install renewable energy generation to power the operation, lower our carbon emissions, create jobs and business opportunities locally, and invest in our employees and primary host communities to improve local quality of life dramatically. We are even building a farm on site to feed the thousands working at MML and continue our aggressive recruiting and training to achieve our goal of a minimum of 30% women in our workforce. I want to thank all my colleagues at MML and Gerald Group who have made our achievements to date possible and I look forward to the great work ahead.

Sincerely,

Frederic Lotti

Chief Operating Officer, MML
(SVP, Global Head of Investments, Gerald Group)

Governance and MML's Approach to Sustainability

Marampa Mines Limited is governed by its Board of Directors, consisting of Gerald Group's executive leadership, which manages the project primarily on site. The Board also has a GoSL director, to represent the Government's 10% stake in the project. The Board of Directors guides the direction of the mine's commercial activities, manages relationships with major contractors and provides oversight. It is chaired by Gerald Group's CEO, Craig Dean.

MML also has a Steering Committee that advises the Board of Directors and coordinates between Heads of Departments (HoDs) to maintain continuity through daily operations.

The foundation of MML's corporate governance is formed by Policies that provide structure for the operation – these are available online at marampamines.com/policies.

MML's Sustainability Policy

Marampa Mines' Sustainability Policy is an umbrella framework that unites the corporate Policies referenced above, the operation's departments, and demonstrates the collaborative nature of the mine site's sustainability programme. The Policy is comprised of six topic areas, designed to advance our commitment to addressing the environmental, climate, social and governance elements of our operation, and to ensure our actions are both transparent and responsible. MML's Sustainability Policy reflects the mining operation's material topics, the key performance indicators (KPIs) this document reports on and is aligned with Gerald Group's Sustainability Policy.

MML embraces the mentality that the 'whole is greater than the sum of its parts', which speaks to sustainability as a value creation proposition. Sustainability drives progress for MML by integrating the mine site's separate functional areas with structured collaboration and strategy.

MML ESG Working Group

MML's Steering Committee approved the formation of the MML ESG Working Group in early 2022, shortly after Gerald's ESG team was formed. The Working Group is comprised of Gerald's ESG team and key MML HoDs. The Working Group meets monthly and works to coordinate cross-organisational initiatives designed to further MML's sustainability initiatives. To integrate sustainability as a functional role into the organisational structure of the company, we have reorganised to create a newly formed ESG Department with a mandate to build cross-functional systems and partnerships across the mine site. The MML ESG Working Group's structure allows for efficient data collection, collaboration and communication between the many moving pieces that come together under the banner of sustainability at the mine site.





Materiality Assessment

As previously mentioned, MML's Materiality Assessment was carried out separately from Gerald Group's trading operations, ensuring elements specific to the mining operation were fully accounted for. MML's assessment focused on the impacts, positive and negative, the operation has in terms of the environment, the climate, communities and the economic impact on primary host communities and Sierra Leone as a whole. MML will revisit its materiality assessment conclusions for each reporting period to adjust as economic, social, and geopolitical conditions change.

Material Topics

Environment: MML seeks to be a responsible steward of natural resources in and around our mining concession area. We strive to avoid negative outcomes: we restore or rehabilitate land we have affected and offset or, failing that, compensate for any environmental impacts resulting from our operations. MML's activities within Environment include: water management, biodiversity monitoring, particulate matter suppression, air quality monitoring, noise levels, land use and nature-based solutions. Overall, we strive to deliver nature-positive outcomes.

MML monitors many sites in and around our concession, including the Thofayim River Terminal (TRT). The mine site receives priority over the TRT for interventions/corrective actions because it is situated in close proximity to the densely-settled municipality of Lunsar, whereas the TRT is relatively isolated.

Climate: MML accounts for its carbon footprint and works to achieve our goals for GHG emissions reduction. We acknowledge the important role iron ore plays in facilitating the energy transition and decarbonising the steelmaking process, which itself is a crucial challenge to overcome in combating climate change. MML is committed to reducing the carbon footprint of our operation while helping the steel industry do the same.

Health & Safety: MML recognises that a sound Health, Safety and Environment Emergency Management System is essential to operate a successful mining business. The health and safety of the entire workforce is our top priority. As such, we work hard to maintain the highest safety standards while minimising workplace hazards and risks to prevent/eliminate accidents. We provide high-quality medical care for our employees with on-site facilities and for their dependents across the country through insurance or retainership services. We monitor and contribute to the medical needs of our primary host communities and promote overall wellness in our primary host communities.

MML Sustainability Objectives: Material Topics



Our People: MML is a major employer in the Port Loko district of Sierra Leone. We are actively seeking to increase female participation in our workforce, and we support all our employees with professional development opportunities and training. We are proud to provide high quality jobs and opportunities to those in our primary host communities and across the country.

Community and Economic Development: MML is committed to the advancement of our primary host communities and is dedicating a level of resources to Community Relations & Development that is unprecedented for a mining company in Sierra Leone. MML is the largest foreign direct investment in Sierra Leone and its people. The project contributes to the national economy, government revenues and regional stability. We aim to foster economic development and linkages by contracting locally owned small and medium size enterprises to meet our procurement needs, with the goal of generating broad-based economic growth for the region and the country.



Compliance with Sierra Leonean Law

MML is subject to a range of Sierra Leonean laws, policies, regulations and institutional frameworks that cover environmental management and resource development:

- > *The National Environmental Policy (NEP)*, 1990, revised in 1994
- > *The National Environment Protection Act*, 2000
- > *Environment Protection Agency Act*, 2022
- > *The Mines and Minerals Act*, 2009
- > *The New Forestry Act*, 1988
- > *National Land Policy and Land Commission Act*, 2004
- > *The Wildlife Conservation Act*, 1972

MML operates under a Large-Scale Mining Licence (MLA) awarded by the Ministry of Mines and Mineral Resources (MMR) of the Government of Sierra Leone (GoSL) and an annually renewed Environmental Impact Assessment (EIA) Licence, furnished by the Environmental Protection Agency of Sierra Leone (EPA-SL).

Transparency

We are committed to transparency and the highest standards of conduct. This includes upholding the UN's Voluntary Principals on Security and Human Rights. MML makes our Policies available on our website, which serves as the vehicle to deliver on our commitment to transparency.

Payments made to Public Sector Stakeholders in 2022

Entities	USD
National Revenue Authority (NRA)	5,357,725
Ministry of Mines and Mineral Resources	570,000
Environmental Protection Agency (EPA-SL)	211,497
District Councils	80,200
Chiefdoms (Land Lease)	133,667
Local Government (Land Lease)	53,457
Landowners (Land Lease)	267,334
Local Governments/ Community Development Agencies	262,212
National Social Security and Insurance Trust (NASSIT)	345,300
GoSL Cargo Tracking Note Fee for Export	68,147
Total	\$7,349,539





GoSL has a 10% equity stake in MML – a structure that ensures GoSL shares in MML’s success.

MML participates in the Sierra Leone Extractive Industries Transparency Initiative (SLEITI) reporting and validation process as a member of the Multi-Stakeholder Group (MSG) via the Chamber of Mines. The SLEITI MSG works to promote the use of natural resource wealth for sustainable growth and development in Sierra Leone through a transparent, accountable and effective system of governance of the extractive sector. MSG participants include GoSL, civil society organisations and other mining companies operating in the country. SLEITI makes detailed reporting on the sector’s activities publicly available. Reports are backdated – the 2022 report is expected to be published in 2024. MML is proud to be a member of the SLEITI MSG because maintaining close ties to our stakeholders is central to MML’s longevity as a project and for building trust amongst all stakeholders.

In addition to SLEITI participation, we elect to independently publish our payments to public sector entities in our annual Sustainability Report for each reporting period.

Community Development and Engagement Framework

MML’s licensing requires the implementation of mandatory community engagement activities. The frameworks for this are called the Community Development Agreement (CDA) and Community Development Action Plan (CDAP). MML’s Community Relations & Development (CR&D) Department works to deliver positive social outcomes above and beyond the requirements of our licensing.

Please see ‘Community and Economic Development’ on page 20 for full reporting on our activities in this area.

Marampa Mines Key Performance Indicators Climate



As an iron ore producer, MML plays a central role in the value chain of the world’s most carbon-intensive industrial material – steel³. High-grade iron ore reduces the end-to-end emission factor of the steel it is used to produce because less ore is needed to fabricate the same amount of steel, compared to lower-grade ores. Marampa Blue™ is 65% Fe – among the highest grades available. MML’s climate objective is to minimise the carbon output of our iron ore production to the greatest extent possible and to deliver a product that minimises downstream emissions. MML is pursuing decarbonisation by implementing a range of short-, medium-, and long-term interventions.

Our Approach

MML’s carbon accounting was performed separately from Gerald’s trading operations. Figures displayed are for MML only. MML’s climate action contributes to SDG 13: Climate Action and SDG 12: Responsible Consumption and Production. SDG 12 is particularly salient because it speaks to reconfiguring our production processes as a requirement for intervention. The identified interventions for reducing MML’s carbon output detailed on page 11 are promising, but many, particularly production reconfiguration plans, will take many years to study and then execute, if they are indeed feasible. Others are readily achievable and imminent. We take a long-term view in our approach to building a world-class iron ore mine – one that will shift and adapt to new technologies as they evolve and become commercially viable.

Our Results

2021 Total emissions

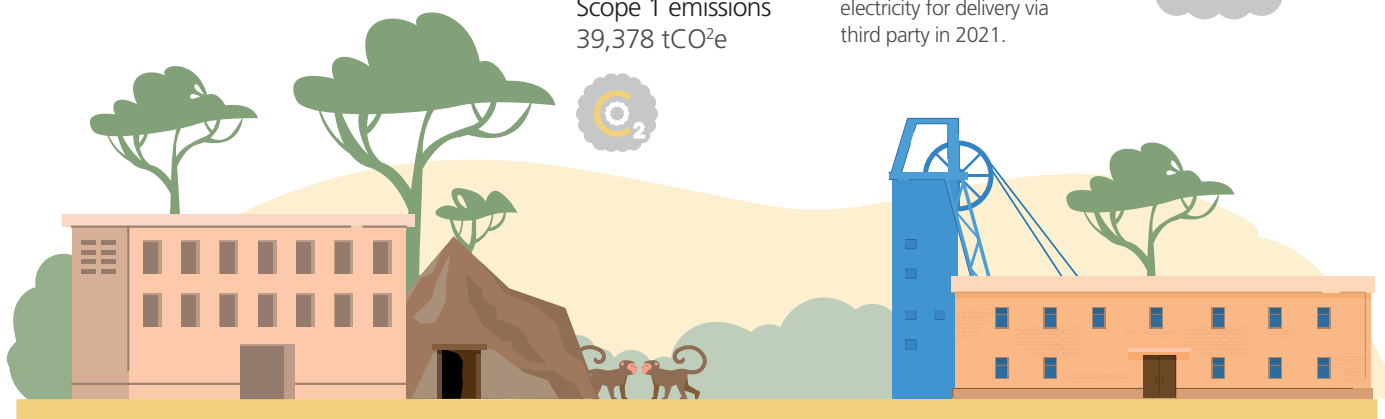
3,429,798 tCO₂e

Scope 3 emissions
3,390,420 tCO₂e

Scope 2 emissions
0 tCO₂e

MML did not purchase electricity for delivery via third party in 2021.

Scope 1 emissions
39,378 tCO₂e



³ Financial Times: Cleaning up Steel is Key to Tackling Climate Change

Interventions for Scope 1 Emissions

MML is committed to securing renewable energy to power our operation. There are several options to do this, each with trade-offs. Each option benefits MML by reducing costs, increasing energy efficiency by moving away from diesel-powered generators, and lowering our Scope 1 carbon footprint.

MML is evaluating the feasibility of installing and operating a solar array and battery storage system on site. Such an installation can potentially meet MML’s needs and generate spare capacity for local distribution. The supply of power would support economic growth and increase quality of life for our primary host communities.

In the short- to medium-term, drawing power from the regional power pool is an alternative to generating our own power on site. Sierra Leone has existing and planned hydroelectric generation projects that are reducing the country’s reliance on fossil fuels for electricity.

MML’s transportation logistics are another compelling opportunity for optimisation. Current operations are supported by a fleet of seven river coasters and one transhipper, to barge offtake to port for transhipment onto ocean-going-vessels. MML is in ongoing negotiations to secure access to existing rail and port facilities that would move Marampa Blue™ to market much more efficiently.

Interventions for Scope 3 Emissions

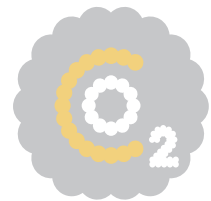
Scope 3 emissions account for 98.8% of MML’s total footprint. Interventions required for reducing our indirect emissions will require significant investment into reconfiguring the mine site’s production methods over the long-term. Production process reconfiguration is the focus here, as doing so can contribute to downstream emissions reductions in steel production.

MML intends for Marampa Blue™ to be competitive in the European market and achieving this will be a function of lowering Marampa Blue™’s downstream emissions. As we sell to European customers, MML’s indirect emissions will see further reduction as a result of the reduction in shipping distance (compared to China, where the majority of offtake is shipped today). Furthermore, the vast majority of European steel producers use electric arc furnaces (EAFs), which are five times less carbon intensive than blast furnaces at the same point in the steel fabrication process⁴.

MML is committed to transparent reporting on the status of planned and in-process interventions for our carbon emissions. Future reporting will keep our stakeholders informed of the conclusions of our feasibility studies, projects, and the technological developments that affect our climate strategy.

63%
We are pleased to commit to a 63% reduction of our Scope 1 emissions, in absolute terms, against our 2021 baseline, by 2050

Scope 3 emissions
3,274,550 tCO₂e



Our Results
2022 Total emissions
3,327,920 tCO₂e

Scope 2 emissions
0 tCO₂e

MML did not purchase electricity for delivery via third party in 2022.

Scope 1 emissions
53,370 tCO₂e



Figures displayed are for MML’s operations only

⁴ European Commission: Prospective Scenarios on Energy Efficiency and CO₂ Emissions in the EU Iron & Steel Industry

Environment



The Environment team manages MML's Environmental Monitoring Plan (EMP) and biodiversity at the mine site. The term 'monitoring' refers to field work, physical sampling and data collection. Data insights help avoid and/or minimise adverse environmental impacts. The Environment team also monitors fuel and energy consumption at the mine site, which is an essential metric for managing the operation's efficiency.

In working to mitigate the impact of mining activities, MML utilises nature-based solutions to the greatest extent possible. Nature-based solutions refer to planning, design, environmental management and engineering practices that incorporate natural features or processes into degraded ecosystems and built environments to promote climate-adaptation and resilience. For example, MML utilises

Vetiver grass as a short-term nature-based solution for slope stabilisation, watershed protection, rehabilitation of landslide areas, moisture conservation and increasing soil nutrition content. Nature-based solutions are the centrepiece of MML's environmental interventions.

Water Stewardship

MML proactively manages water resources to minimise detrimental impacts on quality and availability in our concession area and downstream. This includes monitoring surface/groundwater, treatment processes, effluent treatment and discharge from the tailings storage facility (TSF). Raw water for treatment is drawn from the Rokel River.

MML provides potable water for our employees and contractors at four access points. Providing potable water reduces plastic waste from bottled water supplies. MML conducts daily water quality analysis and contracts a third-party testing service for assurance purposes to ensure all potable water access points meet World Health Organisation (WHO) guidelines for safe drinking water.

MML monitors key bodies of surface water directly and indirectly related to the mine's operations. Doing so is best practice to detect any adverse impact of our activities.

MML monitors runoff from the mine site against the International Finance Corporation (IFC) guidelines for environmentally safe water standards. All tested sources were within IFC acceptable limits for various effluents.

Finally, groundwater is monitored at three protected wells that are key water sources for primary host communities surrounding the mine site. MML is currently working with a contractor to purify these ground water wells via chlorination. This intervention will improve the public health of the communities that rely on them. See Addendum: Tables 1, 2 and 3 for detailed water reporting.

Noise

Noise measurements are regularly collected to ensure the noise levels workers are exposed to daily fall within an acceptable range. We also closely monitor noise levels in villages directly adjacent to ensure the mine's activities are not untenably disruptive. Observational assessments are also carried out to determine whether appropriate mitigation measures are being implemented to minimise any potentially harmful effects of exposure. See Addendum: Table 4 for detailed noise level reporting.

Air Quality

Elevated levels of particulate matter in and around mine sites present a health and safety challenge that requires vigilant attention. At MML, dust is primarily the result of freight trucks travelling along the haulage road in and out of the mine site. Excess particulate matter negatively affects the health of MML's workers and those in adjacent villages, so we deploy a water-soluble suppressant called SDS, a product of 3M, that is sprayed on the road. We also strictly enforce the haulage road's speed limit, which limits the amount of dust kicked up into the air.

Sustainability Programme at Marampa Mines Limited



-  Create circular systems
-  Build climate resilience
-  Transform business models
-  Foster local content and economic linkages
-  Improve livelihoods
-  Protect biodiversity
-  Soil health enrichment
-  Natural resource conservation
-  Increased agricultural productivity
-  Enhanced watershed management practices
-  GHG emissions reductions
-  Carbon sequestration

Circularity

MML runs a disciplined waste management system by which recyclable materials are separated from non-recyclable ones, collected from designated waste disposal points and moved to the waste management centre for proper segregation and final disposal as per best practice.

From June through July 2022, MML contracted a vendor to remove scrap and waste metals from the mine site that had been sitting unproductively. Waste metals have limited resale value while scrap metals have a tangible value from being resold. At the end of the contract period, MML sold 463,420 kg of scrap metals to a local Sierra Leonean firm with a valid export scrap metals permit furnished by GoSL. Waste metals were removed from the mine site by the same contractor, resulting in significantly improved health and safety conditions for MML workers and a win-win for all involved.



Waste Management in 2022 (kg)

	Q1	Q2	Q3	Q4	Total	Disposal Method
Food	616	4,588	8,785	4,633	18,622	Compost
Plastics	334	1,395	8,495	7,158	17,382	Stored for Recycling
Wood/Timber	29,763	3,289	3,450	3,568	40,070	Stockpiled
Paper/Cardboard	678	5,164	8,931	9,006	23,779	Incinerated
Glass Bottles	3,441	4,222	3,361	2,418	13,442	Stored for Recycling
Cans/Tins	1,269	4,564	2,670	2,088	10,591	Stored for Recycling
General	1,338	8,007	10,522	9,099	28,966	Incinerated
Medical	182	1,486	1,327	1,193	4,188	Incinerated
Oil Rags and Filters	7,805	5,431	-	50	13,286	Incinerated
Aluminium Foil	-	-	2,689	5,101	7,790	Stored for Recycling
Ash	-	-	4,002	1,305	5,307	Stockpiled
					182,602	

Energy Use

MML's power consumption falls under two categories: stationary consumption for the site's power plant and mobile consumption for the trucks, river coasters and transhipper that haul offtake to ocean-going vessels.

All power generation is currently derived from fossil fuels, but we are actively working to secure renewable/low-carbon energy for stationary power generation. Further cuts to our reliance on fossil fuels will depend on the outcome of our ongoing negotiation to gain access to the Pepel rail and port facilities.

Fuel Consumption in 2022

Fuel	Q1	Q2	Q3	Q4	Total (L)	Total (Megajoules)
Stationary Diesel (L)	5,332,503	6,333,170	6,355,509	6,905,765	24,926,947	954,463,561
Marine Gasoil (L)	663,221	894,867	619,846	959,731	3,137,664	118,497,206

Energy Consumption in 2022

Fuel	Q1	Q2	Q3	Q4	Total (MWh)
Megawatt hours (Mwh) generated from Stationary Diesel	12,750	14,031	12,859	13,551	53,191



IUCN Red List Inventory on MML Concession
(from 2017 Baseline Assessment)

Extinction Risk Category	Flora	Fauna	Total
Critically Endangered	0	1	1
Endangered	0	3	3
Vulnerable	12	7	19
Near Threatened	1	2	3
Least Concern	0	54	54
Total	13	67	80

Biodiversity

MML’s Environmental Social Impact Assessment (ESIA), which is a comprehensive management plan prepared for and submitted to the EPA-SL for licensing, established a biodiversity baseline to examine the effects (existing and potential) that MML’s iron ore mining has on the biodiversity and biophysical entities in our concession area.

The concession area spans 38.78km² and is a transition zone between the woodland and grassland ecosystems of the Sudan-Guinea Savannah Biome and the closed forest systems of the Guinea-Congo Forest Biome. It hosts terrestrial and aquatic habitats. The terrestrial habitats consist of secondary forest/farmbush mosaic, rice wetlands, lowland forests, flooded natural grassland and secondary savannah, while aquatic habitats include seasonal valley head wetlands, seasonal mid-slope wetlands, seasonal upper foothill streams and perennial lower foothill rivers. The largest habitat is the secondary forest/farmbush terrestrial habitat, covering 75% of the concession area. Flooded natural grasslands are the only untransformed terrestrial habitat while all others have experienced transformations due to mining and village activities. MML’s concession area has hosted mining activity since 1933 and is largely a brownfield, except the southern concession, which has not been subject to mining activities to date. As a greenfield, the southern concession area is MML’s opportunity to employ international best practices in biodiversity management, including the stockpiling of topsoil and the relocation of endangered species, before clearing land and throughout the project’s life.

Changes in the presence and/or absence of the concession area’s native plants and animals informs our mitigation and restoration activities. For example, the low number of reptile species observed during the baseline survey indicates degradation relative to undisturbed lands adjacent to the concession, while high diversity of fish in the Rokel River indicates relative health. The ESIA’s biodiversity baseline assessment also identifies vulnerable species populations within the concession area and utilises the IUCN (International Union for Conservation of Nature) Red List of Threatened Species (IUCN Red List) to assign their conservation status. Of the over 500 total species in the study area, 80 appear on the IUCN Red List.

Mitigating our impact on the biodiversity of our concession area is a top priority for MML’s Environment operations. In 2023, MML is hiring one dedicated biodiversity employee to implement a biodiversity offset plan that will operationalise proactive interventions to preserve and restore biodiversity to the mine site’s operations, as guided by IFC Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources. We will provide detailed reporting on these activities in the next reporting period.

On-site Farm

MML is developing a 70-hectare farm to produce fruit, vegetables and livestock that will meet the daily needs of our 2,612 employees/contractors. The operation will encompass four production systems: fish, chickens, cattle and fruit/vegetables – all built on nature-based solutions and regenerative/integrated agriculture practices. We are performing extensive work to improve soil composition, which has low organic content, low water holding capacity and low nutrient availability. Once soil preparation is complete, livestock rotation prepares pastures and vegetable production areas while naturally controlling parasites. Vegetable production waste is in turn used to feed livestock, creating a positive feedback loop that improves fertility while using one production system’s waste as a free input for another. Some elements of the farm are already operating, and the project is expected to be fully operational by the second half of 2024.

The farm project is emblematic of MML’s integrated approach to sustainability. It will accelerate progress in moving towards more circular systems (repurposing materials, reduced landfill waste, increased composting and drastically reduced reliance on imported foods) that will improve our sustainability performance overall. It is a value-adding proposition for our Community Relations & Development (CR&D) Department, which has and will continue to hire people from adjacent primary host communities for the project, contributing to MML’s Local Content Plan goals. Those hired will gain valuable and transferable agricultural skills and work experience. For more on MML’s CR&D programmes, please see the Community and Economic Development section, on page 20.

Mine Rehabilitation and Closure

Over the medium- to long-term, MML is committed to progressive rehabilitation of the site’s mined out areas and decommissioned tailings storage facility (TSF) using nature-based solutions. This will take time, commitment and resource planning over the remaining 30-year lifespan of the project.

MML will implement a rehabilitation strategy that satisfies the stakeholders of our primary host communities in terms of productive end land uses. Landscape and land use rehabilitation criteria will be agreed to and adapted as needed over the course of an in-depth stakeholder consultation engagement throughout the project’s life. This will ensure their requirements are met and that we achieve long-term stability, biodiversity restoration and ecosystem resilience. MML’s rehabilitation programme will accomplish this by establishing a diverse variety of plant species that will recondition the soil, attract animal life and provide a diversity of habitats for increased structural and biological complexity.

Summary of Remediation Activities

	Problems	Solutions
Flora	<p>Clearing areas for mining activity results in loss of vegetation, habitat/vegetation corridor fragmentation and captured carbon release.</p> <p>Loss of vegetation is likely to continue as the project progresses from one active area to another.</p>	<p>Areas where mining or related activities are no longer likely to be carried out will be rehabilitated as part of MML’s Mine Rehabilitation and Closure Plan.</p> <p>Endangered species in areas cleared for mining will be relocated, not destroyed.</p>
Fauna	<p>Clearing of new areas for mining activity results in habitat disruption/fragmentation.</p> <p>Displacement, injury and death of fauna can result from mining activities.</p>	<p>Intentional killing of animals encountered during mining activities is strictly prohibited.</p> <p>Training and sensitisation of drivers to avoid unnecessary roadkill.</p> <p>MML can support environmental programmes in other areas of Sierra Leone to offset biodiversity loss within the concession area.</p>
Topography	<p>Changes to landscape (hills, interfluves, and inland valley swamps) due to mining activity are expected throughout the project’s life.</p>	<p>Many impacts are likely to be permanent but can be mitigated by refilling excavated pits and distributing topsoil over landscapes affected by stripping.</p> <p>Terracing and contouring to be performed in feasible locations.</p>
Soils and Geology	<p>Mining activity drastically alters the affected area’s natural landscape.</p> <p>Topsoil is displaced, reduced and the soil nutrient profile becomes degraded.</p> <p>Tailings and overburden (waste) are easily eroded by wind and rainfall, resulting in siltation of nearby bodies of water, threatening their ecosystems.</p>	<p>Mine Rehabilitation and Closure plan includes soil testing, land reclamation, remediation and monitoring.</p> <p>Topsoil stripped in clearing will be stockpiled and fertilised for later use.</p> <p>Efforts will be made to ensure no tailings and/or overburden contaminate inland valley swamps.</p> <p>Tailings are to be managed in accordance with international best practices and preserved to be used for filling pits during mine closure and rehabilitation.</p>

Our People



MML’s diverse workforce is highly collaborative and productive. Our employees are the key to unlocking MML’s success in building a reliant and sustainable iron ore project in Sierra Leone. At MML, our many units are united by shared goals and the attitude that every employee plays an essential role in achieving them. Our objective is to foster a supportive organisational culture and a sense of community based on open dialogue, collaboration and respect. Our hiring, staff development and training methods reiterate the importance of diversity in our operations. We do not tolerate any form of discrimination that would undermine those efforts. Our HR and recruiting efforts contribute to achieving SDGs 5: Gender Equality, 8: Decent Work and Economic Growth, and 10: Reduced Inequalities.

Increasing Female Participation in the Workforce

MML makes a concerted effort to recruit and increase the overall participation rate of women in our workforce because we acknowledge that the business case for gender diversity is robust. We aim to ensure the talents of the bright women of Sierra Leone are harnessed, so we are adapting as an employer to meet their needs.

Workforce Headcount (at each quarter-end in 2022)

	Marampa Mines				Contractors			
	Nationals		Expats		Nationals		Expats	
	Male	Female	Male	Female	Male	Female	Male	Female
Q1	721	108	78	8	696	119	136	2
Q2	745	152	75	8	801	175	123	2
Q3	809	144	79	9	1073	244	130	2
Q4	840	191	77	13	1141	260	88	2

Gender diversity brings a more complete range of perspectives on issues that affect our operation, resulting in higher-quality decision-making. Increasing female employment is a demonstrated economic development strategy⁵ benefitting the women we hire, our primary host communities and the company.

In the medium-term, our goal is to reach a 30% female workforce. At the end of 2022, MML’s workforce was 18% female.

Workforce Metrics

At the end of 2022, MML employed 2,612 employees, 93% nationals and 7% expats. Our recruiting and human resources operations contribute to our Local Content Plan objective to give first consideration to nationals whenever possible. 75% of our direct employees are covered by the collective bargaining agreement of the United Mine Workers of Sierra Leone.

Staff Development and Training

MML is proud to invest in the professional development of our staff. Upskilling is central to building a high-quality workforce that can operate the project most effectively and to improving the project’s overall performance. Our longer-term goal – one that contributes to overall social development – is to upskill our employees so they are well-equipped for the mining industry as a whole, not just MML. We conducted 17,524 man-hours of training for our staff in 2022. See Addendum: Table 6 for detailed staff training reporting.

In 2018, the literacy rate for adults in Sierra Leone stood at 43%⁶. In August 2022, MML’s Human Resources team launched an adult literacy training programme for beginners at the mine site, with an initial enrolment of 34 employees from the Security Department attending two-day sessions twice a month. The initiative will ensure participants can read, write and comprehend written and oral health and safety instructions, with a focus on improving communications between employees and their supervisors.

⁵ International Monetary Fund: Economic Gains from Gender Inclusion

⁶ World Bank data

Health & Safety



Ensuring the health and safety of everyone present on site is MML's top priority and we promote best industrial practices to achieve this goal. We aim to minimise physical and health-related incidents by instilling health and safety as a culture and by maintaining high standards for our facilities. MML's health and safety standards work to address SDGs 3: Good Health and Well-Being, and 8: Decent Work and Economic Growth and IFC Performance Standard.

Incident Reporting

MML maintains detailed incident reporting. Mine site personnel must report all near-misses and accidents resulting in personal injury to the Health & Safety Department. Health and safety incident records reveal patterns and guide management's strategy to keep MML's staff safe on site. An incident register is maintained by the Health & Safety Department for gap analysis to ensure continuous safety improvement.

MML reported a total of 305 work-related incidents in 2022, with an increasing prevalence rate in the second half of the year due to the ramp up of mining operations and the mobilisation of contractors on site for production, mining and haulage. We held a total of 1,619 toolbox talks in a bid to raise safety awareness and guide employees on behaviour expected of them while on site. Safety observations play a critical role in helping to identify and control risk exposures, reinforce safe behaviours, drive a 'speak up' culture and ultimately reduce employee injuries. A total of 2,788 hazards and safety observations were reported over the year with more than 80% actions closure.

In 2023, we will improve our Health & Safety performance by refining our approach to risk management with granularly defined roles and accountability safeguards for sectional and departmental heads, robust compliance monitoring and measurement regimes and a new incident management protocol focused on ensuring safe production practices. Together, these interventions will lessen our incident rate going forward.





MML Health Clinic Activity in 2022

	Pre-Employment Evaluation		General Consultations	
	Contractors	MML Direct	Contractors	MML Direct
January	67	56	39	87
February	144	30	18	114
March	66	97	5	137
April	37	69	14	118
May	47	96	6	104
June	80	35	16	138
July	42	14	38	274
August	52	23	36	212
September	155	46	61	229
October	36	16	81	263
November	18	57	66	269
December	66	51	62	210
Total	810	590	443	2,133

Health Clinic Operations and Diseases Monitoring

MML’s on-site clinic is a well-equipped facility that onboard new staff with pre-employment medical exams, provides care to personnel for general medical needs and treatment for endemic diseases. The clinic is also prepared to treat minor to moderate work-related accidents and non-work-related illnesses. The clinic is comprised of an emergency room, pharmacy, laboratory and a five-bed inpatient observation capacity with two ambulances. Severe injuries or illnesses are referred to secondary and tertiary level facilities if needed. Clinic staff conducted 1,400 pre-employment medical examinations and 2,743 general consultations in 2022.

The clinic collects data to monitor the public health conditions of the mine site. MML is developing a malaria and typhoid management protocol to be deployed in 2023 in a bid to reduce the prevalence of these endemic diseases.



Community and Economic Development



MML’s Community Relations & Development (CR&D) Department serves as a bridge between MML and our primary host communities, which include the town of Lunsar as well as villages within and adjacent to the mine concession. CR&D’s mission is to build and maintain trust between MML and our primary host communities through continuous engagement – ensuring that project-affected persons’ needs, aspirations and concerns are valued and reflected in our actions. CR&D also works to keep primary host communities informed of MML’s activities on the mine site, and operates a Community Information Centre in Lunsar to interface directly with the public.

CR&D is a focal point of MML’s ESG initiatives because its activities are the mechanism for achieving our social and economic goals. Our aspiration for our efforts in this area is to leverage wealth generated by our mining activities to produce positive social and economic outcomes for Port Loko and Sierra Leone as a whole.

Community Development Agreement (CDA)

As per the Mines and Minerals Act (2009) of Sierra Leone, MML is required under our licensing to implement a framework for community engagement and development. MML’s Community Development Agreement is that

framework and was ratified on 17 June 2021 after a months-long stakeholder engagement and assessment process.

As previously mentioned, MML designates 1% of free-on-board export revenues for community-driven development projects – a much higher contribution than originally mandated by law and now the national standard. These monies are collected into the Community Development Fund (CDF), which is payable at the beginning of the financial year, based on the previous year’s production output. The CDF’s first tranche of funds is for FY23 and is USD 1.7m. Funded project categories will be: education, infrastructure (water and electric), and agricultural/ food security.

The CDA’s governance structure creates a Steering Committee (of the CDA), which is its governing body. The Committee manages the CDF and evaluates development project proposals for selection and funding. Once selected, the Steering Committee puts contracts out to bid and awards them.

The CDA also establishes the Community Development Committee (CDC), which is charged with project management for all development projects and activities. By separating project management from selection and bidding, the two committees check and balance each other and prevent misappropriation of funds. The 2023 reporting period will include detailed accounting of the CDF’s activities and expenses alongside project status and outcomes.



\$1.7m USD
 for the Community Development Fund in 2023. Funded project categories will be: education, infrastructure (water and electric), and agricultural/food security.

Community Development Action Plan (CDAP)

Sierra Leone's Environmental Protection Act (2008) requires MML to implement a Community Development Action Plan, which is separate but runs parallel to the CDA's activities. The purpose of the CDAP is to reduce adverse impacts of MML's operations while maximising the benefits for project-affected persons. MML's CDAP identified the following project areas for consideration:

- > Provision of additional sources of safe drinking water
- > Provision of sanitation systems
- > Provision of educational materials/supplies
- > Provision of scholarships for school-going children
- > Support for technical vocation skills development
- > Support for generating indirect employment opportunities (economic linkages)

MML is currently reviewing proposals for execution under the CDAP and will include detailed project outcome reporting in the 2023 Sustainability Report. CDAP projects are funded directly by MML, not the CDF.

Medical Outreach Programme

The MML Medical Outreach Programme started in 2021 and reached approximately 500 women and girls in Lunsar and its surrounding communities through 2022. The programme creates spaces for women and girls to talk about their health issues, discuss preventive measures to help with their health challenges and builds support networks within their own communities. Discussion is focused on addressing myths around endemic disease like Malaria and on reproductive health issues such as family planning, and transmission, prevention and treatment of sexually transmitted infections.

Local Content Plan: Creating Economic Linkages

MML is proud to give first consideration to Sierra Leonean goods and services providers to meet the procurement needs of the company and we always seek to hire and train talented individuals from Sierra Leone before looking abroad. By prioritising local hiring, procurement and training programmes for both low-skills and management roles, MML is actively contributing to the growth and development of Sierra Leone's economy.

In partnership with Procurement, CR&D conducted a series of workshops in August with 30 Lunsar-based companies to help onboard them as suppliers for MML. CR&D guided them through completing the required 'Know-Your-Customer' form and learned that many would-be suppliers struggle with formalities like this – itself a valuable takeaway to ensure MML contracts are open and accessible to all qualified suppliers. Of the 30 suppliers, 26 are now active vendors for MML. This is an example of MML's proactive approach to accomplishing our Local Content Programme goals, to the benefit of both parties.

Upskilling and Workforce Development

MML seeks to make a positive contribution to our primary host communities by looking outside our concession borders to improve the lives of others. While the 'Staff Development and Training' section on page 16 refers to our employees, this section pertains to those not employed by MML.

Establishing a formal, youth-focused, skills development and training pipeline is a top priority for CR&D in 2023. This 'Skills for Employment' programme aims to cultivate a pool of well-trained young people with skills aligned with MML's needs that are not currently available in the local labour market. The young people we train will benefit from higher earning power while the overall economic potential of our primary host communities grows. MML plans on leveraging partnerships with local educational institutions to build programmes that benefit our trainees, our primary host communities and MML's recruiting efforts.

Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) is a formal process by which any project-affected person can make a complaint or a suggestion about the way MML's activities impact the community or themselves as an individual. Identifying and responding to grievances supports the development of positive relationships between MML and affected communities and other stakeholders. Grievances can be made by individuals, households or groups, including villages.

CR&D works to ensure the GRM's purpose is communicated to all project-affected persons and made accessible to them, so that they are aware of the process, their right to submit their grievances and their right to receive a response. CR&D staff are trained on the Grievance Redress Mechanism, conflict management and resolution, and interest-based negotiation.

Grievance Redress Statistics in 2022

	Number of Grievances Received	Unresolved
Q1	1	0
Q2	1	0
Q3	1	0
Q4	5	1

Our Agenda for 2023 and Beyond



2022 was a fruitful year for MML as the company achieved impressive milestones. We produced 2.05m metric tonnes of iron ore concentrate, and now employ 2,612 people. MML's sustainability goals coincide with our commercial goals, which is to say that we cannot meet one set without the other. As Sierra Leone's largest foreign direct investment by many measures, we are proud to continue expanding our commitments to the country and its people. We are targeting production capacity of 3.75m mt/year by the end of 2023, and are optimistic for further expansion down the road. In 2023, we will:

- > Finalise our renewable energy generation strategy to power our operations
- > Improve our Health & Safety performance by refining our approach to risk management with granularly defined roles and accountability safeguards for sectional and departmental heads, including a malaria and typhoid management protocol
- > Implement a biodiversity offset plan that will operationalise proactive interventions to preserve and restore biodiversity into the mine site's operations
- > Continue work on MML's regenerative farm project
- > Fund a slate of community development projects via the Community Development Agreement
- > Establish a formal 'Skills for Employment' programme to invest in the youth of our primary host communities

Finally, we will continue to advance our commitment to decarbonise the steel value chain as we maintain the

consistently high-grade of Marampa Blue™. We take our role to help the global economy transition away from fossil fuels and finally get a handle on climate change very seriously. Overcoming this challenge – the biggest of our time – will not be easy, but doing so is the only path forward, and we embrace it.



Thank you to our stakeholders – our people – for getting us to where we are today. We have accomplished so much over a remarkably short period. Yet, the journey for MML has just begun.

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Addendum

Table 1: Potable Water Consumption in 2022

	Total (cubic metres)
Q1	12,589,400
Q2	15,969,900
Q3	17,316,000
Q4	13,468,900
Total	59,344,200

Table 2: Groundwater Monitoring in 2022

Analyte Name	Units	WHO Drinking Water Guidelines ¹	Rogbaneh	Chaindath	Gbom Limba	Thofayim Borehole
			Mine site Residential (Protected wells)			TRT (Protected borehole)
pH		6.5 - 8.5	6.9	6.95	6.9	7.1
Conductivity	µS/cm	<450	43	120	37	36.9
Total Dissolved Solids Dried at 180C	mg/L	<284	17.2	60	18.5	14.76
Turbidity	NTU	<5.0	0	0	4	10
Total Hardness	mg/L	<500	35	30	25	50
Manganese	mg/L	<0.1	0.001	0.001	0	0.005
Magnesium	mg/L	<200	10	9	7	19
Ammonia Nitrogen	mg/L	-	0.02	0.04	0.02	0.18
Nitrates Nitrogen	mg/L	<10	0.28	0.32	0.04	0.36
Nitrite Nitrogen	mg/L	<3.0	0.02	0.32	0.14	0.04
Aluminium	mg/L	<0.2	0.07	0.07	0.02	0.11
Fluoride	mg/L	<1.5	0.29	0.21	0.34	0.54
Sulphates	mg/L	<400	4	9	15	25
Sulphide	mg/L	<0.5	0.02	0.02	0.02	0.05
Phosphates	mg/L	<20	0.11	0.09	0.17	0.18
Potassium	mg/L	<6.0	0.9	2.4	2.3	2.7
Iron	mg/L	<0.3	0.03	0.06	0.06	0.12
Copper	mg/L	<1.0	0.04	0.05	0.26	0.24
Zinc	mg/L	<5.0	0.09	0.2	0.24	0.17
Chromium	mg/L	<250	0.02	0.01	0.08	0.07
Chloride	mg/L	<250	9	0	35	55

Values presented above are consolidated annual averages generated from sample data collected on a weekly basis.

¹ World Health Organization Guidelines for Drinking-water Quality, 4th edition

Table 3: Surface Water Monitoring in 2022

Analyte	pH	Conductivity	Total Dissolved Solids Dried at 180C	Turbidity	Free Chlorine	Total Hardness
Unit		µS/cm	mg/L	NTU	mg/L	mg/L
WHO Drinking Water Guidelines ¹	6.5 - 8.5	<450	<284	<5.0	0.3-0.5	<500
Mine site Industrial	7.3	34.9	16.03	5.02	0.0025	114.79
Mine site Residential	7.35	15.3	7.73	5.5	0	107.5
TRT	7.23	57.23	28.36	5	0	93.75

Surface water monitoring locations are consolidated into 3 categories from 11 individual sites. Values presented above are consolidated annual averages generated from sample data collected on a weekly basis.

Table 4: Noise Monitoring in 2022 (dB)

	Q1	Q2	Q3	Q4	IFC EHS Upper Limits Guidance ¹ (dB)
Mine site Industrial	72.4	74.4	78.6	78.1	70
Mine site Residential	66.8	67.5	65.1	67.4	55
TRT Residential	66.1	74.7	59.7	48.3	55
TRT Industrial	78.9	82.8	69.3	64.9	70
Lunsar Monitoring Point (reference)	70.1	63.1	82.3	62.5	55

Noise level data is consolidated from a total of 32 monitoring points, including the Lunsar Monitoring Point, which is a reference for in-town noise levels that MML does not control. Values reported are averages across 3 monitoring periods within each quarter. Measurements were collected in the first week of each month for a total of 12 sample periods. All measurements are conducted during one-hour periods during the day. Nights were excluded as mining operations pause at night.

¹ IFC Environmental, Health, and Safety (EHS) Guidelines GENERAL EHS GUIDELINES: ENVIRONMENTAL NOISE MANAGEMENT

Ammonia Nitrogen	Nitrates	Nitrite	Aluminium	Fluoride	Phosphates	Iron	E- Coli	Fecal Coliform	Salmonella Typhae
mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	CFU	CFU	CFU
-	<10	<3.0	<0.2	<1.5	<20	<0.3	0	0	0
0.0783	0.815	0.14	0.143	0.597	0.165	0.05	1.25	2.875	1.875
0.0775	0.3925	0.0725	0.108	0.703	0.168	0.11	0	0	0
0.04	0.9025	0.35	0.123	0.413	0.3	0.1425	0	0	0

1 World Health Organization Guidelines for Drinking-water Quality, 4th edition

Table 5: Occupational Training Courses Delivered in 2022

Type of Training	Number of Attendees	Training Duration Hours	Total Man-hours
General Site Safety Induction	2,961	2	5,922
Authorised Driver's Permit Induction	628	2	1,256
Authorised Driver's Permit Practical	628	2	1,256
Basics of Supervising Others Training	67	12	804
Workplace Etiquette & Confidentiality	28	2	56
Probationary Training	22	2	44
4x4 Light Vehicle Training	24	2	48
Job Safety Analysis Training	82	2	164
Basic Firefighting Training	99	2	198
Basic First Aid Training	143	8	1,144
Bobcat Training	7	6	210
Scaffolding Training	9	20	180
Hand & Power Tools – Safe Operation	10	10	100
Workplace Team Building Training	28	2	56
Sexual Harassment Awareness Training	27	1	27
Hazard Identification & Risk Assessment	23	6	138
Highway Driving Codes Training	22	2	44
Drugs & Alcohol Awareness Training	8	1	8
MS Excel 365 Training	163	24	3,912
Conveyor Belt Safety Training	97	3	291
Telescopic handler (Telehandler) Training	7	36	252
Active Mining Area Induction	115	2	230
Communication Skills Training	15	8	120
Time Management Training	29	8	232
Adult Basic Literacy & Numeracy Training	32	26	832
Total Training Man-hours in 2022			17,524 hours