



EASTERN MINING D.O.O. VAREŠ
PROJECT VAREŠ – POLYMETALLIC MINE
TRAFFIC MANAGEMENT PLAN

March 2023

Content

1. INTRODUCTION.....	4
1.1. Location and setting of the project.....	4
1.2. Purpose and scope of the Traffic Management Plan.....	6
2. REGULATORY REQUIREMENTS AND STANDARDS.....	10
2.1 Special requirements from permits that apply to the project.....	10
2.2 National legislation.....	10
2.3. International requirements.....	11
3. ROLES AND RESPONSIBILITIES.....	11
4. TRAFFIC MANAGEMENT AND MITIGATION MEASURES.....	12
4.1 Traffic management and measures to mitigate the impact on traffic safety.....	12
4.1.1 Control of entry to the construction site.....	13
4.1.2 Movement of construction machinery.....	14
4.1.3 Communications.....	15
4.1.4 Emergency services.....	15
4.2 Environmental impact and mitigation measures.....	16
5. MONITORING AND REPORTING.....	23
6. TRENING.....	25
7. PLAN REVIEW AND UPDATE.....	25
8. COMPLAINTS AND INCIDENTS.....	26

Figures

Figure 1. Map showing the location of the Vareš Project.....	4
Figure 2. Map showing the route of the Vareš Project.....	7
Figure 3. Maps of access roads from the direction of Kakanj to the location of the Rupice mine.....	8
Figure 4. Section of road R466 in the area of Kraljeva Sutjeska.....	9
Figure 5. Map of the access road Podlugovi - Vareš Maidan (R444).....	9
Figure 6. Entry points to construction sites.....	14

Tables

Table 1. Roles and responsibilities.....	11
Table 2. Potential impacts of noise and vibration on the environment and mitigation measures.....	18
Table 3. Potential impacts on society and mitigation measures.....	18
Table 4. Potential air quality impacts and mitigation measures.....	19
Table 5. Potential impacts of greenhouse gas emissions on climate change and mitigation measures.....	20
Table 6. Potential impacts on soil and mitigation measures.....	21
Table 7. Potential impacts on water and mitigation measures.....	21
Table 8. Potential impacts on biodiversity and mitigation measures.....	22
Table 9. Monitoring plan.....	24

TRAFFIC MANAGEMENT PLAN IN THE CONSTRUCTION PHASE

This document has been developed/revised as indicated below and described in the revision record on the next page. Please destroy all previous revisions.

Revision	Date	Authors	Revised	Pages
1.0	15/03/23	Prof.dr. Šefket Goletić Mr.sci. Halim Prcanović	Vildana Mahmutović Elmin Škulj Aida Ahmedović	27

ISSUED FOR: Design Construction Operations Other _____

1. INTRODUCTION

1.1. Location and setting of the project

Eastern Mining d.o.o. is owned and managed by Adriatic Metals PLC and is located in Bosnia and Herzegovina (BiH). Eastern Mining d.o.o. is the holder of the concession for the exploration and exploitation of polymetallic ore in the area of the municipality of Vareš (BiH). The project consists of the Rupica polymetallic deposit and the ore processing plant at the Tisovci location, as well as a 24.5 km transport road connecting these two locations¹.

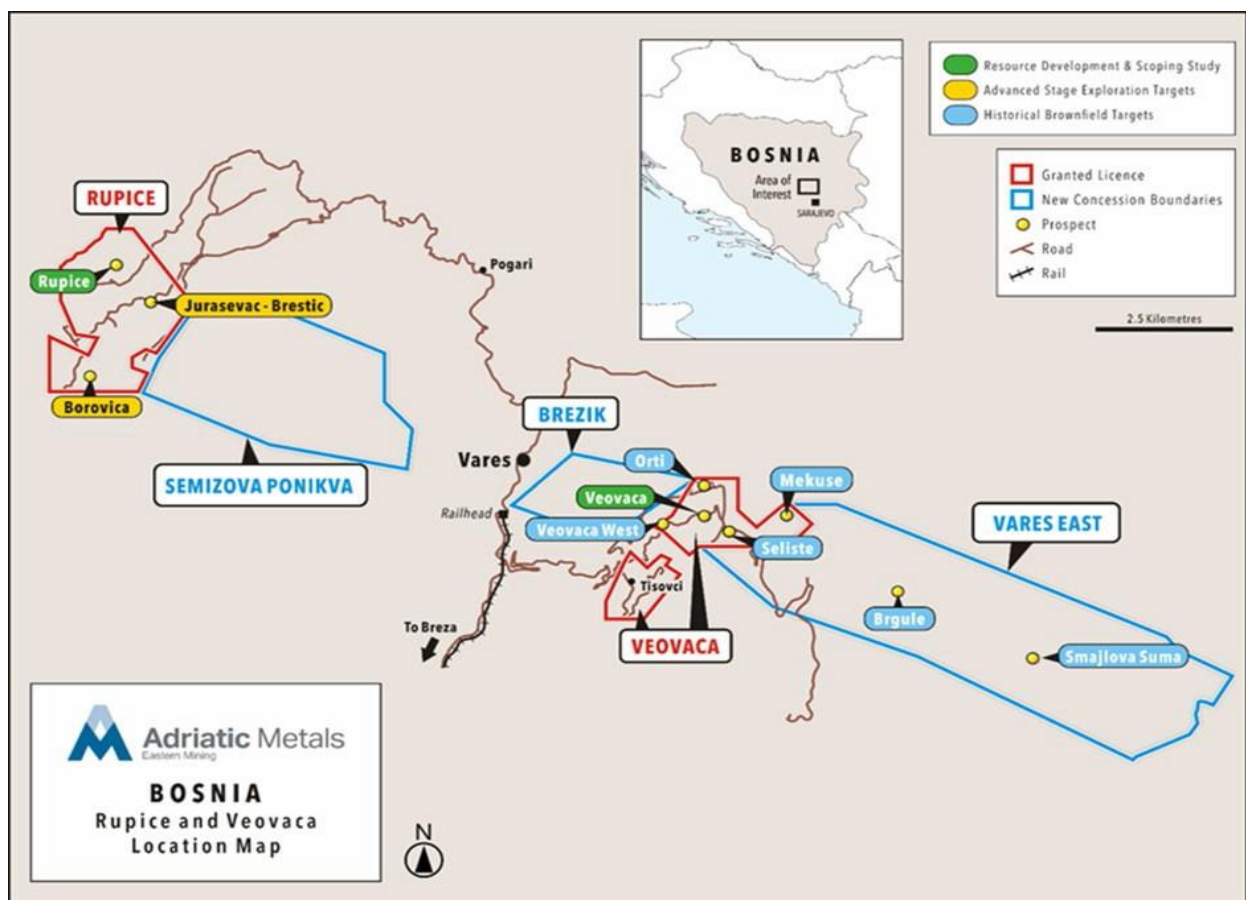


Figure 1. Map showing the location of the Vareš Project

The locations are located 8.7 km west-northwest, i.e. 3.5 km east of the town of Vareš. Access to the concession area is possible via an asphalt road through the mining town of Breza from the A1 highway and from the mining town of Kakanj via the regional road R466, which is mostly asphalted and a smaller part is a macadam road.

The location of the Rupice mine is located inside a steep wooded valley, on land owned by the state and managed by the JP "Forestry Society of the Zenica-Doboj Canton" Zavidovići. The freight road from the Rupica mine site to the Tisovci ore processing plant site passes through a

¹ Preliminary design of the road from the location "Rupice" to "Tisovci", about 25 km long, area of the municipality of Vareš
January 2023

combination of forest land, using existing forest and local roads where possible, as well as some parts of grassland/meadow. Access to the project area of the Rupica mine and the Tisovci ore processing plant is possible via the regional road R444 Podlugovi-Breza-Vareš, from which the local asphalt road separates towards the villages of Pržiči and Tisovci, where the ore processing plant is located. From the town of Vareš, it is possible to access the location of the Rupica mine via local asphalted, macadam roads and forest roads that go through the areas of the villages of Pogar and Gornja Borovica. In the same way, access for trucks to the location of the Rupice mine is also possible via the regional road R446 Čatići - Kraljeva sutjeska - Mehorić and further along the forest macadam road with a length of approx. 2.5 km to the Rupica location.

During the construction phase, the existing roads will be used to access the Rupica mine site and the Vareš polymetallic ore processing plant (VPP) at the Tisovci location, but the works also include upgrading the proposed transport route and building new sections. Trucks with a capacity of up to 30 tons will transport ore and waste material 24.5 km between the Ore Processing Plant at the Tisovci location and the Rupice mine location. The route will also be used for the transportation of workers, raw materials, auxiliary materials and fuel, service vehicles and equipment for plant and maintenance. The road, which is designed as a macadam road with some road connections, will be constantly maintained. Roads are designed by a local engineering group, and built and maintained by local contractors in accordance to contract. This will include road maintenance and keeping the entire route clear in winter conditions.

The route for the transport of construction materials, raw materials and equipment between the Rupice mine location and the Tisovci ore processing plant, is designed to avoid local communities and sensitive areas (drinking water protection zones on the Bukovica River and other sensitive areas) as much as possible, especially on sections from the town of Vareš to the location of the Rupica mine. Although it will be a publicly accessible road, traffic signs will be installed to warn users of the presence of heavy vehicles on the road. The route of the freight road passes through the following cadastral municipalities: Borovica, Pogar, Dragovići, Vareš and Pržiči. The route is divided into two sections (not adjacent), the newly designed section is approx. 15 km and a section on existing roads of approx. 9.5 km. A certain part of the route on the existing roads will need to be repaired and widened in order to enable the passage of heavy trucks in both directions, and the part of the route that does not pass through the existing roads is in the construction phase in accordance with the designed technical characteristics. The calculated speed for the newly designed road is 30 km/h.

The phases of the project will depend on the transport route for the transport of construction materials, raw materials, explosives, equipment and the transport of labor, as well as the operation of a large number of heavy construction machines and vehicles in a relatively short period of time during the construction phase. The transport of construction materials from the project locations and local suppliers will take place on the existing road network, which includes asphalted and macadam roads (e.g. regional road R466, Kakanj-Kraljeva sutjeska, Mehurić, Ponijeri with the separation of the forest road to the Rupica location, 2.500 m long, and route between cities Vareša i Tuzle).

1.2. Purpose and scope of the Traffic Management Plan

The purpose of the Traffic Management Plan is to implement measures to mitigate the impact of traffic on the environment and society during the construction phase determined in the environmental impact assessment: to meet the requirements of applicable legislation and standards, to set roles and responsibilities, to identify transport routes and to implement safety measures on these routes and to monitor the compliance of measures arising from this plan.

The traffic management plan should be a living document and will be regularly reviewed and improved during the construction phase of the project to take into account any significant changes related to construction procedures, communication and mitigation measures.

Company Eastern Mining d.o.o. has full responsibility for the implementation of measures and the achievement of the goals specified in this Traffic Management Plan.

In order successfully implement the planned measures and goals from this Traffic Management Plan during the construction phase, it is necessary to harmonize the transportation of equipment and materials with the conditions of traffic on local roads in order to plan and organize the transportation of equipment and materials in such a way as to avoid and / or minimizes the impact on public traffic and to plan oversized and special or more frequent transportation outside the periods in which the most intensive public traffic takes place. The person responsible for traffic management is obliged to plan and take measures to minimize the impact on public traffic.

This traffic management plan overlaps with other management plans such as:

- Community Health Care and Safety Management Plan;
- Emergency preparedness and response plan;
- Biodiversity Action Plan;
- Noise and vibration management plan,
- Hazardous materials management plan i
- Air quality management plan.

The traffic management plan during the construction phase is aligned with the applicable national regulations of the Federation of Bosnia and Herzegovina and the Zenica-Doboj Canton, and with the requirements of international financial institutions, such as IFC performance standards, EBRD requirements and other applicable international good industry practices (GIIP). This Plan is a living document and responsibilities, procedures and compliance procedures should be updated as necessary and at least annually.

The following picture shows the route for transporting ore and other materials and goods from the Rupice mine to the ore processing plant at the Tisovci location, and tailings and other goods from the Tisovci location to the Rupice mine location.

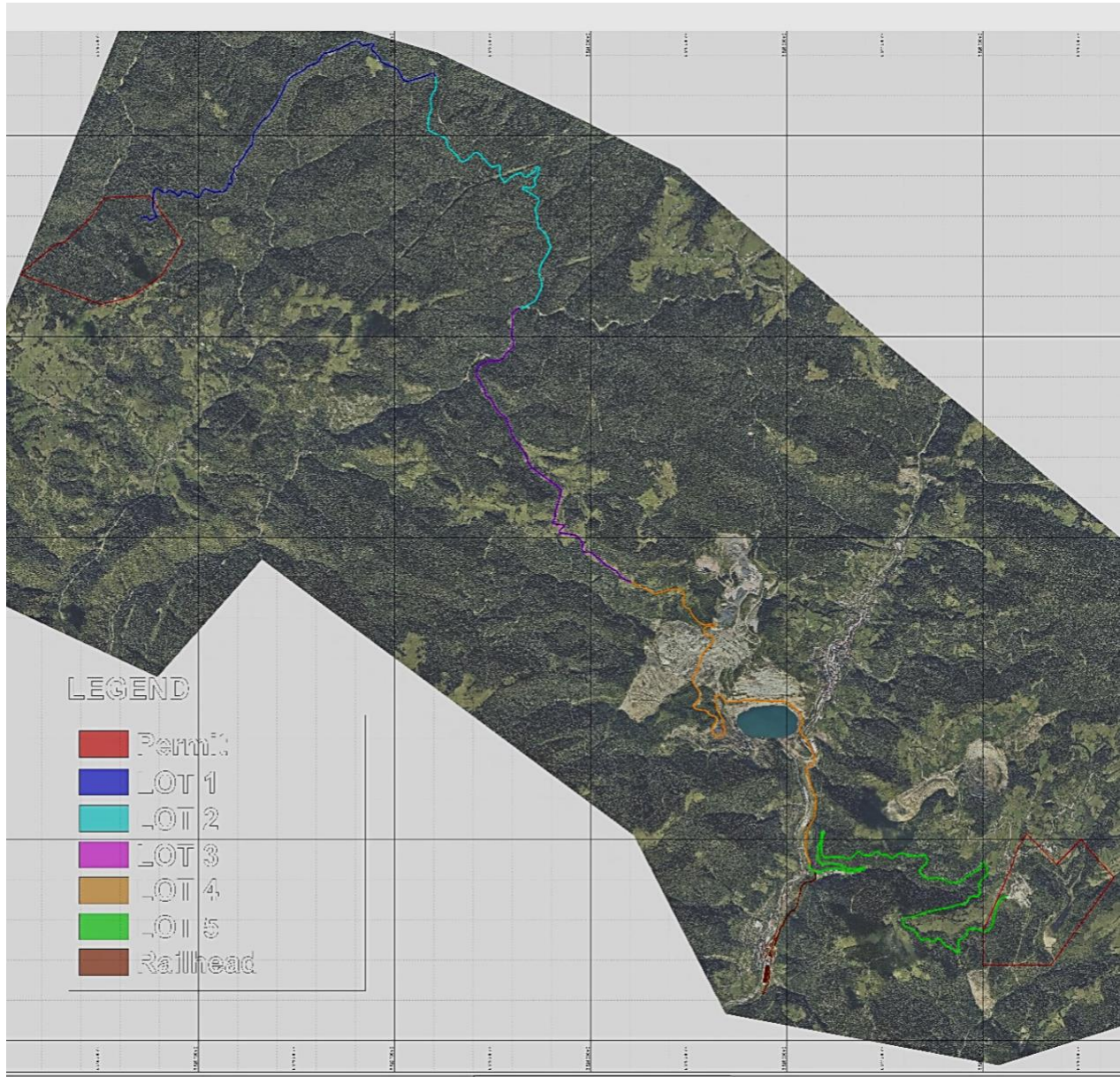


Figure 2. Map showing the route of the Vareš Project

Delivery of equipment and construction materials to the location of the Rupice mine is planned from the area of Kakanj Municipality via two access roads:

1. **The access road Kakanj - Ponijeri - Mehorić - Rupice, which is planned for the delivery of equipment and construction materials,** goes on an asphalt road through the urban and suburban areas and then through the forest area to the sports and recreation area Ponijer. Road then continues on the macadam road to Mehorić, macadam forest road along the road along the river Trstionica from which separates along Vrući potok to the location of the Rupice mine (Figure 3). This road will be used during the construction phase to deliver equipment and construction materials of larger loads and larger sizes to the Rupice mine location. This access road is acceptable for the delivery of equipment and construction materials under certain restrictions regarding the mass and dimensions of cargo and road vehicles. The standard load limit on public roads is 40 tonnes (gross/MGW), 2.55 m wide, 4 m high and 18

m long. Any exceedance of these weight and dimensions limits of road vehicles requires the prior obtaining of a permit for the transport of cargo, escort and potential closure of the road on which the transport of oversized loads is carried out. Regarding the given dimensions of the vehicle when transporting cargo, the limitation is the existing tunnel to the place of Ivnica, the height of which is 5.5 m and the width is 6 m.

2. **Approach road Čatići - Kraljeva Sutjeska - Mehorić - Rupice** goes along the regional road R466 to the Mehorić location and further along the forest macadam road along the river Trstionica and Vrući potok in a length of approx. 2.5 km to the location of Rupica (Figure 3). The section of the regional road Čatići - Kraljeva Sutjeska - Mehorić (R466) is acceptable for the delivery of equipment and construction materials under certain restrictions regarding the mass and dimensions of cargo and road vehicles. The technical characteristics of this road enable the transport of cargo by road vehicles with a height limit of up to 3.70 m and a width of up to 4.20 m due to the narrow section of the road (Figure 4). The standard load limit on public roads is 40 tonnes (gross/MGW), 2.55 m wide, 4 m high and 18 m long. Any exceeding of the specified load weight limits and road vehicle dimensions requires obtaining a cargo permit, escort and potential imprisonment the road on which the transport is carried out. The restriction of transport on this access road is represented by a cut and a small tunnel (3.7 m high and 4.2 m wide) on the regional road in the area of Kraljeva Sutjeska.

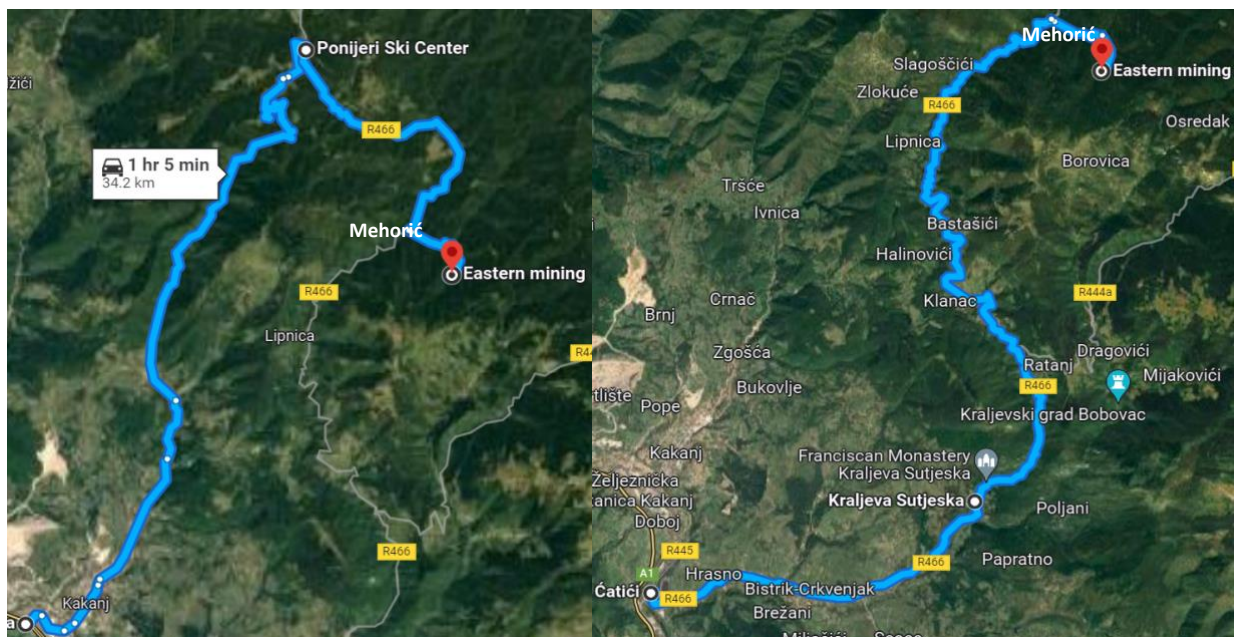


Figure 3. Maps of access roads from the direction of Kakanja to the location of the Rupice mine

The section of the access road from Mehorić along the river Trstionica and Vrući potok to the location Rupice in length approx. 2.5 km is in bad condition (unstable road construction), which is why its reconstruction and strengthening of bridges is planned.

It should be emphasized that the mentioned access roads from the direction of Kakanj to the location Rupice will be used occasionally, mostly at night, for the transport of equipment and construction materials during the construction phase. Oversized loads will be delivered to the location of the Rupice mine organized with prior notice and under organized escort.

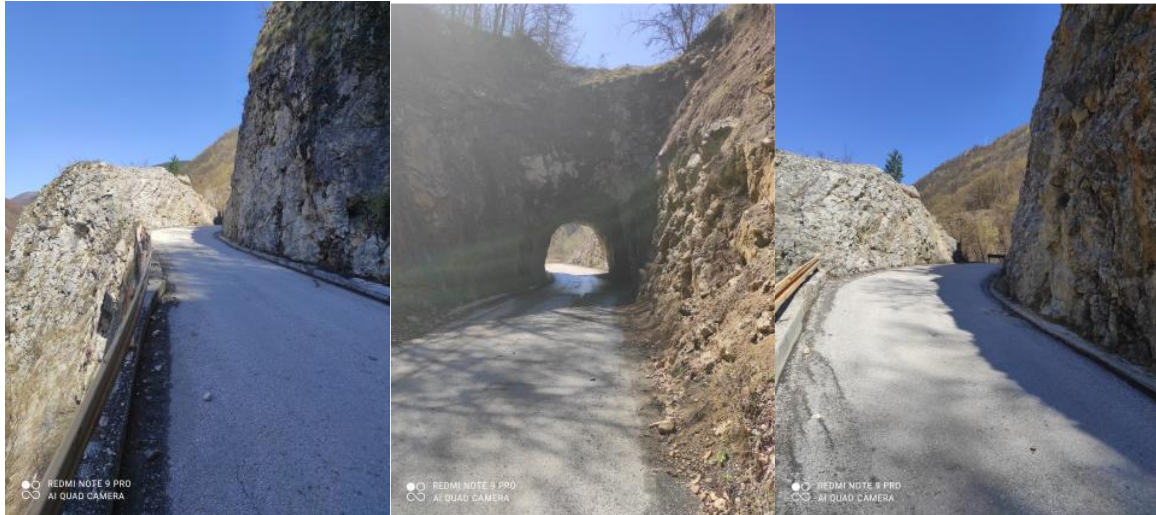


Figure 4. Section of road R466 in the area of Kraljeva Sutjeska

The access road to the Rupica mine and the ore processing plant at the Tisovci location is planned through the regional road R444, Podlugovi-Breza-Vareš (Figure 5), from which the local asphalt road to the villages of Pržiči and Tisovci separates, which will be used for the transport of equipment and construction materials to the location of the Tisovci ore processing plant. Likewise, from the town of Vareš, it is possible to access the location of the Rupica mine via local asphalted, macadam roads and forest roads that pass through the villages of Pogar and Gornja Borovica.

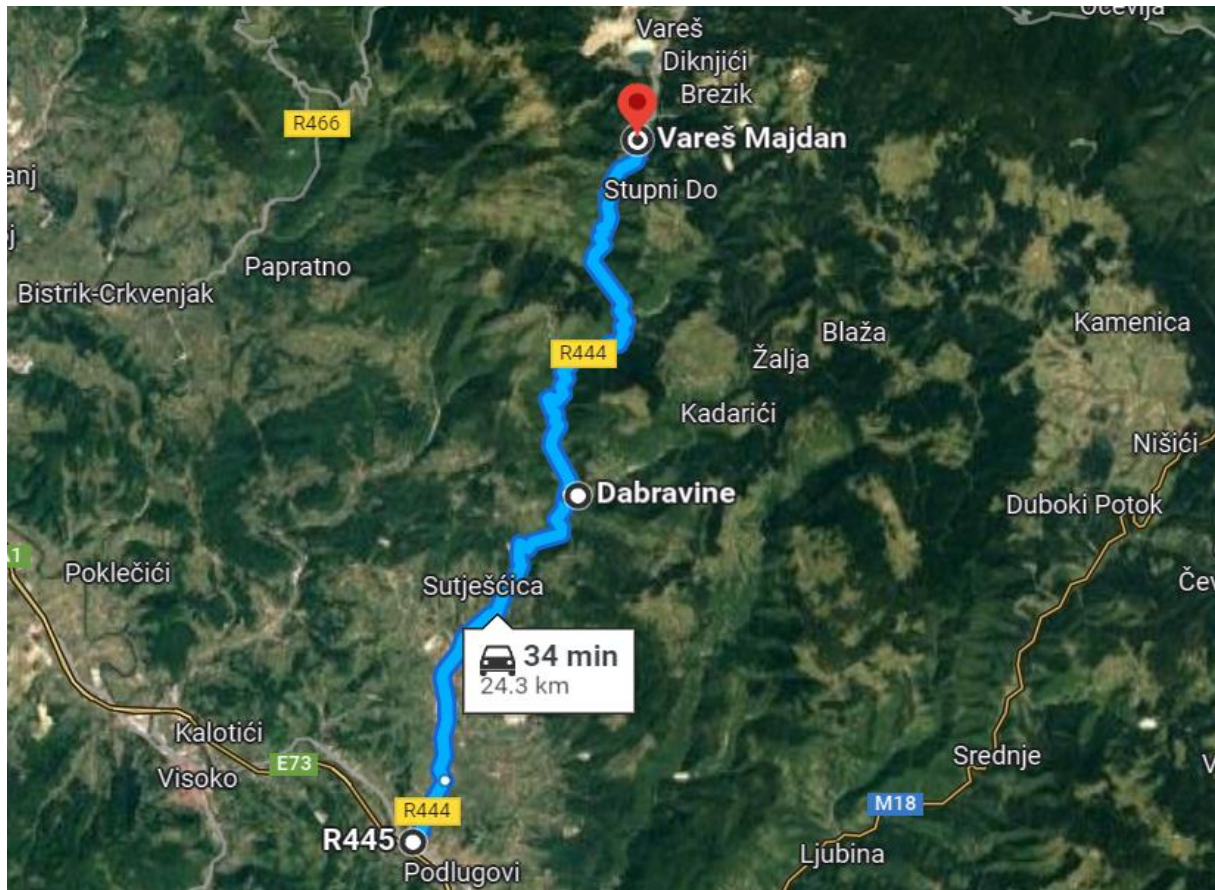


Figure 5. Map of the access road Podlugovi - Vareš Majdan (R444)

2. REGULATORY REQUIREMENTS AND STANDARDS

Eastern Mining intends to implement procedures in accordance with international best practice in addition to local legislation, respecting the principles and policies of the European Bank for Reconstruction and Development (EBRD) and the International Finance Corporation (IFC).

2.1 Special requirements from permits that apply to the project

Special requirements from project permits (water permit, environmental permit, urban permit, construction permit and other permits and permits), which are applicable to the project, are:

- Roads, manipulative surfaces and plateaus must be adapted to the appropriate loads and protected by a suitable road curtain, in accordance with the traffic load and the technical requirements and conditions of the competent authorities;
- Undertaking and implementing traffic management measures in the crossing zones of existing local roads;
- Installation and maintenance of temporary traffic signals in places according to the Rulebook on traffic signs and road signaling, the way of marking works and obstacles on the road and the signs given to road users by an authorized person ("Official Gazette of BiH", no. 16/07);
- Ensure the safety of the works, as well as the movement of machinery through contractual obligations with the contractor, with mandatory compliance with the safety provisions of the Regulation on Construction Site Arrangements, mandatory documentation on the construction site and construction participants ("Official Gazette of the Federation of Bosnia and Herzegovina", number 48/09, 75/09 and 93/12);
- In order to reduce the risk of accidents during the execution of works, place warning signs that limit the speed of machines and vehicles, and prohibit unauthorized access to places where heavy machinery works;
- Undertaking and implementing environmental protection management measures in accordance with the measures and objectives from the ESMP.

2.2 National legislation

- Law on Roads of the FBiH ("Official Gazette of FBiH", no. 12/10, 16/10 and 66/13);
- Law on Road Transport of the FBiH ("Official Gazette of FBiH", no. 28/06);
- Rulebook on special conditions for motor vehicles used for transportation ("Official Gazette of FBiH", no. 07/07);
- Rules on traffic signs and signaling on roads, the way of marking works and obstacles on the road and the signs given to traffic participants by an authorized person ("Official

- Gazette of FBiH", no. 12/10, 16/10, 66/13);
- Law on Occupational Safety ("Official Gazette of FBiH", number: 79/20);
 - Law on the Transportation of Dangerous Goods ("Official Gazette of the SFRJ", number: 27/90 and 45/90);
 - Law on Environmental Protection ("Official Gazette of FBiH", number: 15/21);
 - Law on Waste Management ("Official Gazette of FBiH", number: 33/03,72/98 and 92/17)
 - Law on Nature Protection ("Official Gazette of FBiH", number: 66/13).

2.3. International requirements

- Performance requirements of EBRD (PR) 1;
- Performance requirements of EBRD (PR) 3;
- Performance requirements of EBRD (PR) 4;
- IFC PS1: Assessment and management of environmental and social risks and impacts;
- IFC PS3: Resource efficiency and pollution prevention;
- IFC PS4: Community Health, Safety and Security;
- General IFC guidelines for EHS: 1.1 Air emissions and outdoor air quality, 04/30/2007;
- IFC General Guidelines for EHS: 1.7 Noise, 30 April 2007;
- IFC General Guidelines for EHS: 3. Community Health and Safety, 30 April 2007.

3. ROLES AND RESPONSIBILITIES

The main roles and responsibilities for the implementation of this plan are listed in the following table.

Table 1. Roles and responsibilities

Roles	Responsibilities
Executive Director	<ul style="list-style-type: none"> • Provide adequate financial resources for the implementation of this plan; • Ensure that the plan is distributed to all relevant contractors and subcontractors in order to implement it.
G&P maintenance coordinator (Adis Rožajac)	<ul style="list-style-type: none"> • Traffic management plan implementation in accordance with the documentation; • Ensure that employees or subcontractors have the necessary skills and training to carry out traffic management activities; • Ensure that this management plan is respected in terms of the implementation of all obligations; • Comply with all necessary requirements.
Person responsible for occupational health and safety	<ul style="list-style-type: none"> • Undertaking and implementing all planned measures related to the health and safety of employees and all persons present in the zone of construction and use of transport roads
Transport manager (Adis Rožajac)	<ul style="list-style-type: none"> • Implementation of the Traffic Management Plan in construction phase
Road Construction Supervisor (Elmin Škulj)	<ul style="list-style-type: none"> • Construction site management during road construction in cooperation with subcontractor construction site managers; • Implementation of the Traffic Management Plan and the construction phase

Construction site manager Rupice (Edin Fatić)	<ul style="list-style-type: none"> • Management of the Rupice construction site in cooperation with subcontractor construction site managers; • Implementation of the Traffic Management Plan in the construction phase.
Vehicle operators	<ul style="list-style-type: none"> • Adhere to the Traffic Management Plan during the construction phase.
All employees	<ul style="list-style-type: none"> • They participate in the necessary trainings; • Ensure self-competence in terms of implementing this plan

4. TRAFFIC MANAGEMENT AND MITIGATION MEASURES

In order to minimize the impact of activities during the construction of the Project on existing roads and the environment, it is necessary to apply all the measures prescribed by this Traffic Management Plan.

4.1 Traffic management and measures to mitigate the impact on traffic safety

The increased volume of traffic and the presence of heavy vehicles on the roads, as a result of the implementation of the planned activities, were assessed as a potential impact on local traffic and local roads, especially in the period of more frequent transport of equipment to the location of the Rupice mine and the location of the Tisovci ore processing plant, which requires taking measures of increased supervision and management in order to mitigate the impact on public traffic. In addition, unplanned events such as traffic accidents involving the transport of construction materials and machinery could occur on roads that will be used by local residents and other users. Increased risks may appear on sections through settlements and on the route for material/waste extraction in the northwestern part of Vareš during the construction phase, as well as on some inadequate bridges, crossings and narrow roads. Higher volumes of traffic due to the transportation of materials could cause unwanted occurrences if adequate management measures are not taken in accordance with this plan and legal regulations, such as:

- Unintentional vehicle collisions that can result in material damage and in the worst case, injuries and/or deaths;
- Spilling of hazardous materials or hazardous waste during transport, which may affect environmental pollution and endanger ecological conditions in natural habitats if incident situations occur in sensitive areas (watercourses, etc.);
- Loss or damage of public and private property in unforeseen extreme incident situations;
- Conflicts with the local population at crossing areas or in the case of a lack of crossings, roadways or traffic signs due to more intense road traffic and the passage of heavy vehicles;
- Collisions, trampling and damage to large animals on sections that pass through the forest.

4.1.1 Control of entry to the construction site

The points of entry to construction sites from public roads have been selected and arranged so that project activities can be carried out smoothly and are equipped with traffic control means. Controls must include the following:

- Entry points where the speed of passing vehicles is high in relation to the size of the entrance must have an exclusion lane for left turns;
- Vegetation at the point of entry must be removed to increase visibility;
- In case of reduced visibility, it is necessary to use warning signs with flashing light;
- If necessary, in order to increase traffic safety, introduce left-turn bans for some vehicles;
- In order to reduce the deposition of soil onto public roads, install a wheel cleaning device and take measures to prevent the removal of soil and waste from the construction site onto public roads, as well as the cleaning of deposited and excavated material from roads.

All entry points to the construction site must be clearly marked in order to safely introduce drivers to the construction site. These places must be used in accordance with the prescribed requirements, and if necessary, closed over night.

The points of entry to the construction sites within the project areas are:

a) Location of Rupice mine:

- Entrance to the construction site of the Rupice mine (R1) from the freight road from the direction of Igrišta;
- Entrance to the construction site of the Rupice mine (R2) from the regional road R466 from the direction of Kraljeva Sutjeska and via the access forest road along Vrući potok;

b) Location of the ore processing plant at the Tisovci location:

- Entrance to the construction site of the Tisovci ore processing plant (T1) from the asphalt access road through the village of Pržići, controlled by a ramp and guard service;

c) Location of the freight road route Rupice - Tisovci:

- Entrance to the construction site of the freight road Rupice - Igrišta (lot 1) from the local road to the village of Gornja Borovica (C1) and from the construction site of Rupice (R1);
- Entrance to the construction site of the freight road section Igrišta - Mrestilište (lot 2) from the local road to the village of Gornja Borovica (C1) and from the regional road R444a (C2) near the fish pond Mrestilište;
- Entrance to the construction site of the freight road section Mrestilište - Semizova Ponikva (Lot 3) from the regional road R444a near Mrestilište (C2) and from the local macadam road to the village Semizova Ponikva (C3);
- Entrance to the construction site of the freight road section Semizova Ponikva - Vareš Majdan (lot 4) from the regional road R444 from the direction of Vareš Majdan (C4);
- Entrance to the section of the existing local asphalt road Vareš Majdan - Pržići (lot 5a) from the regional road R444 from the direction of Vareš Majdan (C4) for the purpose of reconstruction of this road section;

- Entrance to the construction site of the road section Bijelo Borje - Tisovci (lot 5b) from the local road to the village Pržići (C5);
- Entrance to the access road to the transfer station at the location Vareš Majdan (lot 6) from the local road Vareš Majdan - Pržići (C4).

The places of entry to construction sites from public access roads are shown in Figure 6.

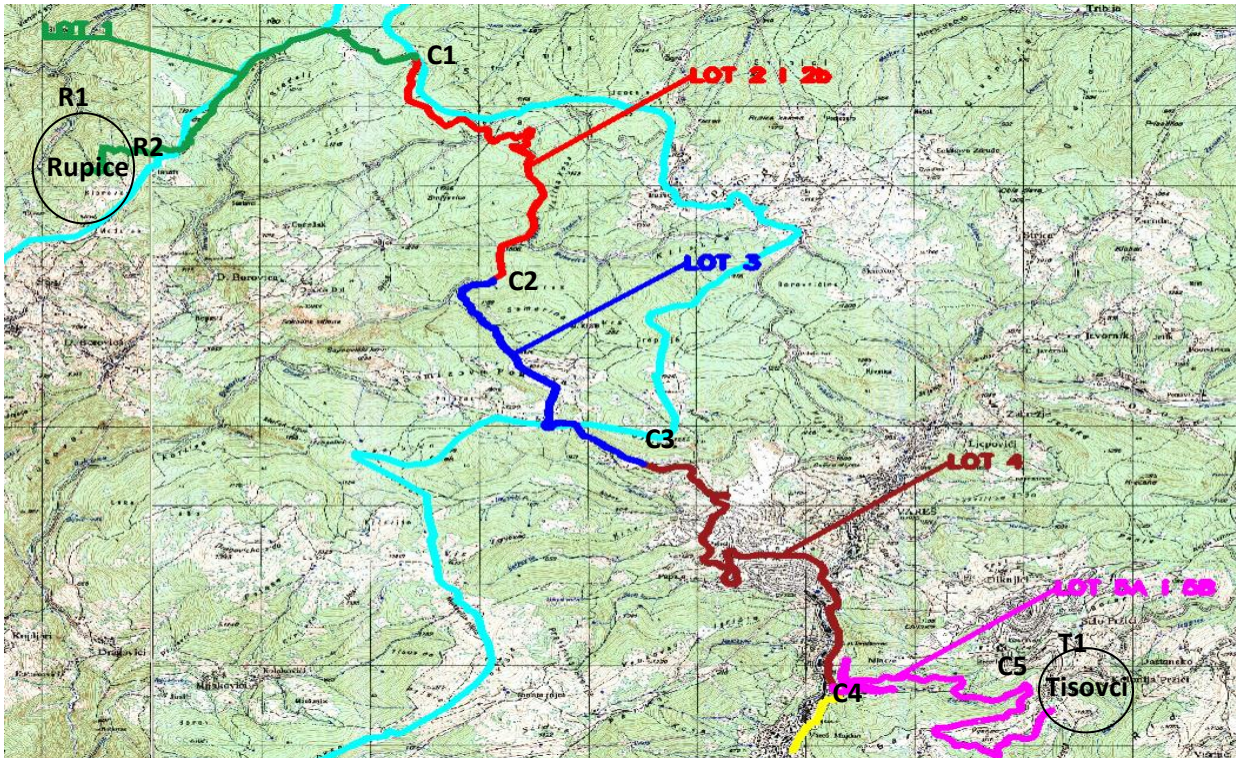


Figure 6. Entry points to construction sites

4.1.2 Movement of construction machinery

During the construction phase, a large number of trucks will be used to transport soil, sand, cement, equipment and the like. Some large loads will be transported outside normal operating hours and transport routes in order to minimize the effects on the local transport network and the population. Most of the equipment and materials for the Rupice mine and the ore processing plant at the Tisovci site will be transported on the regional road R444 from the direction of Podlugovi and further from Vareš Majdan by the local road to Pržići and to the Tisovci site. A small part of the equipment for the Rupice mine (several trucks), including possible oversized loads, is planned to be transported by road from the direction of Kakanj via Ponijeri and Mehorić and via the access road along Vrući potok to the location of Rupice or the regional road R446 from the direction of Kraljeva Sutjeska via Mehorić and the access road along Vrući potok to the location of Rupice in the period from April to June 2023, depending on the type and dimensions of the cargo. It is planned that this transport will be carried out in an organized manner under escort at night with prior announcement of large loads. The delivery of materials for the construction of the freight road will be carried

out via the mentioned access roads and partly via the regional road R444 from the direction of Podlugovi. The staff will come to the construction sites by organized transport and private cars, whereby each construction site should have a dedicated parking space for vehicles.

In order to avoid impact on public traffic during the construction phase, every truck should be equipped with a rotating light that must be placed on the roof of the vehicle or some other suitable place. The movement of vehicles on public roads must be carried out in accordance with the regulations on public transport safety, and on construction sites in accordance with the regulations on occupational safety, which will control the responsible persons in accordance with this Traffic Management Plan.

4.1.3 Communications

Information related to the management of the traffic in the construction phase of the Project will be distributed regularly in various ways (email, in writing, verbally, etc.) to all participants of the Project in order to inform them and coordinate their activities. This information must also include data on changes to the Project during the construction phase, especially from the aspect of traffic changes in order to provide fresh information to road users and property owners. In addition, the information must contain data on:

- Any constructive works and the establishment of temporary traffic on certain sections that can cause traffic jams for more than 5 minutes and
- Any work that may limit the size of vehicles that can be passed on the section where the work is being carried out.

All communications during construction must be at such a level that the local community, users of public roads and property owners in the construction zone are fully aware of activities on the construction of project contents that have a potential impact on travel, which will enable them to plan their trips.

When transporting large and oversized loads across the territory of the Municipality of Kakanj, it is mandatory to take measures for organizing such transport in order to minimize public traffic disruption on the transport routes of large loads in accordance with the measures from this Traffic Management Plan.

4.1.4 Emergency services

According to the Law on Traffic Safety, emergency services have the priority of movement on all roads, even during the use of temporary traffic restrictions on certain roads and sections in order to minimize the time of arrival at the scene of the accident and transportation to the Health Center in Vareš or Kakanj, or to the Zenica Cantonal Hospital.

Currently, there are no plans to close any of the public roads during the construction phase of the project. However, if there is a need to close the road for up to 48 hours or longer, it is necessary to notify the competent authority for road management and emergency services in order to obtain approval for the road closure.

The investor must provide a map of transport routes for emergency services access in order to respond as quickly as possible and take all necessary measures according to the Health and Safety Management Plan.

4.2 Environmental impact and mitigation measures

Transportation of equipment and materials on public roads can potentially affect the environment, especially due to noise and vibrations of possible oil and fuel leaks, spillage of materials during transportation and incident situations.

Noise and vibration emanating from supply trucks traveling on public roads can affect ambient noise and vibration levels in the vicinity of sensitive receptors. Heavy machinery and cargo trucks will access the construction site via the public road network and will remain within the project area throughout the construction phase. All subsequent effects on noise levels in the environment near the public road network will appear in a short period of time during the construction of the infrastructure at the Rupice mine location, the ore processing plant at the Tisovci location and the construction of the Rupice - Tisovci freight road.

Some heavy and oversized loads and equipment for the Rupice mine will be delivered in the period from March to June of the current year, with the planning of each transport of heavy and oversized loads and organized escort in order to have as little impact on public traffic as possible. All other loads and materials will be brought to the Rupice and Tisovci plant locations via public roads from the direction of Podlugovi under the supervision of responsible persons in accordance with the measures defined in the Traffic Management Plan.

It is assumed that the movement of light vehicles, which are used to transport supplies, light materials and employees on public roads, will be limited to daytime hours for technological and safety reasons.

The road route was designed to avoid settlements and other sensitive areas as much as possible. In the case of the need to apply additional measures to mitigate the impact of noise on the environment, appropriate measures should be taken such as the installation of panels or embankments along transport roads to ensure additional noise reduction between transport trucks and the nearest community in potentially threatened areas.

Considerations of potential air quality emissions related to traffic are categorized as:

a) Fugitive dust - Particles created by transport and handling of material and transport on unpaved roads can affect local air pollution in dry and windy weather due to vehicle movement and construction works. The erosive effect of vehicle traffic on transport roads is considered a potential source of dust because the mechanical action of the wheels on the road surface causes dust lying on the road surface to be ejected and drawn into the moving air flow. The emission of this dust depends on meteorological conditions, the intensity of traffic and the measures taken to prevent the development of dust from roadways and freight vehicles. The dispersion and deposition of this dust depends on the size of the particles and

meteorological conditions. The erosivity of transport roads depends on the number and size of wheels, vehicle speeds and the surface material moisture content.

Additional measures to control and suppress uncontrolled dust emissions will be used systemically during execution of works, as stated in this Traffic Management Plan, and the Plan on Air Quality Management and Greenhouse Gas Emissions, Environmental Permit, and they include:

- 1. Road control** - Appropriate dust suppression techniques and measures will be taken, including spraying roads/vegetation with water and/or applying stabilization agents such as salt (winter), gravel or environmentally inert chemicals, as appropriate. In addition, appropriate equipment will be procured and employees will be hired to maintain road surfaces, which will be used to deliver equipment and construction materials in order to prevent and mitigate uncontrolled dust emissions on all access roads, i.e. sections where uncontrolled dust emissions may occur or occur.
- 2. Speed limits and off-road driving** - Establishing and enforcing Project safety rules, including mandated enforcement of speed limits on Project roads and all access roads and limiting off-road driving will limit the potential for additional fugitive dust emissions, as well as public safety hazards. Those employees whose jobs involve driving, as well as transport contractors, will be informed of the safety rules and the prohibition of off-road driving. Instructions on driving safety and obeying speed limits will be included in the training of all new employees and the annual (refresher) training related to the fulfillment of tasks for a given traffic-related position.
- 3. Covering bulk material on vehicles** - in order to prevent the dissipation of materials and small particles under the influence of wind and vehicle movement on public roads, especially through populated areas.
- 4. Control of the possibility of uncontrolled dust emissions on access roads** - in order to determine the possibility of uncontrolled dust emissions due to traffic in order to take intervention measures to prevent and mitigate dust emissions and their impact on the environment.

In addition to consideration, control and prevention, i.e. prevention and minimization of potential dust emissions, it is necessary to ensure regular daily control and regularly take measures to prevent and mitigate emissions of pollutants into water and soil, as well as noise emissions and other potential negative impacts of traffic on the environment in the construction phase in order to take the necessary measures to avoid and mitigate the negative impacts of traffic on the environment, including control measures on the basis of which corrective measures will be taken.

The following tables show potential impacts on the environment and mitigation measures during the construction phase of the project contents.

Table 2. Potential impacts of noise and vibration on the environment and mitigation measures

		Mitigation measures
Impact	Noise and vibration emanating from supply trucks when traveling on public roads	Soil embankments constructed along transport routes will be located to provide additional noise mitigation between vehicles traveling on the roads and the nearest populated place or sensitive receptors
		Roads with a hard surface will be built and well maintained in order to reduce the emission of noise and dust
		Limit speed through settlement to reduce aerodynamic noise
		Transport routes should be well maintained and where there are steep grades operators will be trained to minimize engine noise by avoiding unnecessary turning and taking other noise mitigation measures
		The starting of vehicles and machines will be carried out in such a way as to produce as little noise as possible
		All vehicles will be fitted with reversing alarms, set to the lowest level, in accordance with health and safety concerns
		Carrying out regular inspections and high-quality maintenance of vehicles and material handling equipment in order to reduce noise as much as possible, including preventive maintenance of built-in silencers, replacement of worn parts and lubrication of sliding surfaces so that the noise emission level is within the design noise specification and lower than the prescribed limit values
		Do not use vehicle or device that produces loud noise due to a malfunction and disable its operation until the cause of the increased noise is removed
		The movement of vehicles through sensitive areas and settlements should be limited during the weekend and at night in order to reduce the impact of noise during quieter periods of the day.
		Establish speed limits in relation to road conditions and the location of sensitive receptors, such as populated areas
		Keeping the access road surface in good condition to reduce noise from tires
		Ensure continuous traffic flow to minimize the long-term idling of the drive motors

Table 3. Potential impacts on society and mitigation measures

		Mitigation measures
Impact	Public access to the construction site will be limited by a fence and safety zones; During construction activities, trucks and labor will use the existing roads until the new road is built; The use of trucks and machines could have an impact on the existing road network in the entire project area; Transportation of equipment and construction materials via access roads from the direction of Kakanj and Podlugovi can affect the road infrastructure, which is why mitigation measures are needed;	Timely publication of the Traffic Management Plan for the construction phase
		All employees and contractors must be trained for appropriate use of public roads, which will be covered by the employee code of conduct and the Traffic Management Plan
		Implementation of measures from the Traffic Management Plan, special training for transport route contractors, encouraging the Municipality to undertake road cleaning in remote areas, limiting public use of the transport route as necessary, etc.
		Contact of the Manager for Logistics/Transport and clear definition of the traffic route as agreed

<p>Increased vehicle traffic could damage existing roads until a new freight road is built. It should be noted that the project has already improved local roads in the area used by employees, especially the road to the villages of Pržiči and Pogar. The project will also improve some existing roads, as part of the transport road development;</p> <p>There will be a combined impact of the transport fleet, buses for employees, vehicles for the delivery of equipment and materials, and an increase in the number of private cars on the road, due to immigration and higher consumption by the population. A traffic assessment in the area has shown that there is capacity to handle this increase. Parking spaces in the city of Vareš are already limited and will be additionally burdened during construction due to the increased number of users. Building a parking lot and providing rides for employees will help reduce the need for parking in the city. This parking lot will be available to the local community, assuming sufficient capacity.</p>	<p>Inform all drivers about speed limits and the obligation to respect the traffic limits in urban areas and settlements</p>
	<p>Warning signs placed in major public places to alert local communities of danger in the vicinity of project sites and transport routes, the presence of heavy vehicles and any road closures or reconstructions, including alternative routes</p>
	<p>Provide transparent and clear explanations to justify the enforcement of exclusion and security zones around transport routes</p>
	<p>The delivery of equipment and materials of larger dimensions using the access roads from the direction of Kakanj should be organized and carried out by announcing the planned transport, preferably at night and under escort.</p>
	<p>Road traffic of heavy vehicles in the construction phase through the area of villages Pogar, Tisovci and Semizova Ponikva and possibly other villages must be prohibited between 22:00 and 6:00</p>
	<p>Clearing snow during the winter months on the transport route, transport roads and existing public roads.</p>
	<p>Repair of damage on used access and transport roads.</p>
<p>Special training will be conducted regularly with transport contractors</p>	

Table 4. Potential air quality impacts and mitigation measures

		Mitigation measures
Impact	Fugitive dust caused by the movement of trucks;	Wetting unpaved roads with a moderate amount of water to maintain surface moisture in order to prevent uncontrolled dust emissions
	Fugitive dust created by cargo trucks on transport roads and access roads to construction sites;	Maintenance of hard-surfaced road sections near residential locations and near particularly sensitive habitats in order to prevent uncontrolled dust emissions
	The erosive action of vehicle traffic on transport roads is considered a potential source of dust because the mechanical action of	Adequate equipment and trained employees for maintenance of road surfaces to control dust on access roads and construction sites
		Speed limits and off-road driving limitation. Establishing and implementing the security rules of the Project
		Limit off-road driving unless absolutely necessary
		Reduce the number of trips with efficient loading procedures for transporting materials as much as possible

<p>the wheels on the road surface causes dust lying on the road surface to be rised and drawn into the moving air flow;</p> <p>Vehicle exhaust (diesel driven), with emissions including NOx, particulate matter (PM10) and CO2.</p>	Apply stabilizers to high dust areas
	Covering or wetting the surface of the bulk cargo of the truck in order to prevent dust emission during driving
	Wetting the surface of unpaved roads and traffic surfaces within the construction site
	Maintenance of gravel/laterite covering on unpaved roads and traffic areas of the construction site
	Provide sections of the road with a hard surface near residential locations and along the section of the road near meadows and hydrophilic vegetation of tall greens
	Introduce speed limits for heavy equipment and other road users on unpaved roads
	Train drivers and operators of construction machinery on maximum idle time
	Install appropriate equipment for vehicle emission control - if necessary
	Regularly maintain and inspect vehicles and mobile equipment, including their emission control systems in order to reduce the emission of pollutants into the air.

Table 5. Potential impacts on climate change and greenhouse gas emissions and mitigation measures

		Mitigation measures
Impact	<p>Vehicle exhaust (diesel driven), containing NOx, particulate matter (PM10) and CO₂, including:</p> <ul style="list-style-type: none"> - road vehicles for extracting/transporting materials from excavations and construction materials, - construction machinery for work on the construction site, - transportation of employees in their own vehicles and by bus to the location of the construction site and back and - all other means powered by diesel fuel. 	The transportation of employees will be organized by buses, which will reduce fuel consumption.
		Where possible, fuel efficiency will be a factor in vehicle selection as this will not only reduce emissions, but also reduce operating costs.
		In addition to the efficiency of the vehicle fleet itself, opportunities will be sought to improve the use of vehicles in order to reduce greenhouse gas emissions.
		Regular optimization of vehicle movements in accordance with the progress of Rupice mine logistics and planning in order to improve the efficiency of vehicle use and reduction of total CO ₂ emissions
		Install and maintain appropriate equipment for vehicle emission control, if necessary, in order to reduce greenhouse gas emissions.
		Regular maintenance of the technical condition of vehicles and technical inspection of vehicles and mobile equipment, including their emission control systems in order to reduce greenhouse gas emissions as effectively as possible.

Table 6. Potential impacts on soil and mitigation measures

Impact	<p>Road traffic, transport of materials, equipment, fuel, chemicals and workers; Construction of a new road according to the project. Lane width min. of 5 m plus an additional 0.5 m of sidewalk and 0.5 m of embankment; Land near the road where pollution can occur due to deposition of emitted substances, uncontrolled spillage/leakage; Movement and parking of construction machinery and vehicles on the ground outside the construction site; Accidental spills of chemicals, oil and fuel during transport; Uncontrolled leaks and runoff from construction sites and roads; Storage of liquid fuels and other materials that can pollute the soil and the environment; Uncontrolled disposal, scattering and storage of waste.</p>	Mitigation measures
		<p>Soil that is not contaminated with pollutants will be stored with special attention to the appropriate locations determined by the project and the construction site manager, as it can be reused for embankments, landscaping, remediation of abandoned spaces after closure of the Project</p> <p>Use efficient vehicles with reduced emissions</p> <p>Maintenance of construction machinery and vehicles in order to prevent uncontrolled leakage and outflow of oil and fuel</p> <p>Exclusion of construction machinery and vehicles from operation until the causes of leakage are eliminated;</p> <p>Measures during the transport of chemicals, fuel and other hazardous materials defined by the Hazardous Materials Management Plan;</p> <p>Cleaning and removal of bulk chemicals, oil and fuel with a layer of contaminated soil using a suitable absorbent (sawdust, sand, etc.) and disposed of as hazardous waste;</p> <p>Liquid fuels and lubricants and other materials can only be stored in equipped warehouses. Storage of any materials and disposal of waste is not allowed within the water protection zones of the Bukovica;</p> <p>Avoid any activities outside the construction site zone, especially in the area of possible impacts on the hydrological and ecological conditions of the Bukovica river;</p>

Table 7. Potential impacts on water and mitigation measures

Impact	<p>Road traffic, transportation of materials, equipment, chemicals, fuel and workers; Carrying out project activities on construction sites; Implementation of project activities in the zone of influence on watercourses (on banks and riverbeds and water quality); Uncontrolled leaks and runoff from construction sites and roads;</p>	Mitigation measures
		<p>Maintenance of construction machinery and vehicles in order to prevent uncontrolled leakage of oil and fuel</p> <p>Exclusion of construction machinery and vehicles from operation until the causes of oil and fuel leakage are eliminated;</p> <p>Taking and carrying out measures during the transport of chemicals, fuel and other hazardous materials defined by the Hazardous Materials Management Plan</p> <p>Cleaning and removal of spilled oil and fuel with contaminated soil using suitable absorbent material (sawdust, sand, etc.) and disposal as hazardous waste;</p> <p>Parking of machinery and vehicles in suitable places outside the zones of influence on watercourses, especially on Bukovica river;</p> <p>Work should be carried out outside the banks and beds of the Bukovica River and catchment streams in order to preserve the natural state of the banks and beds and prevent impacts on hydrological and ecological conditions;</p>

<p>Accidental spills of chemicals, fuel and oil during road transport;</p> <p>Movement and parking of construction machinery and vehicles in the zone of influence on watercourses;</p> <p>Storage of liquid fuels and other means and materials that can pollute water;</p> <p>Uncontrolled waste disposal;</p>	Build and maintain settling ponds for the reception and treatment of rainwater in order to prevent the discharge of muddy water into watercourses and their impact on local streams, especially taking measures to prevent the impact on Bukovica river and its tributaries
	Liquid fuels and lubricants and other materials can only be stored in equipped and controlled warehouses outside the zones of influence on watercourses and especially outside the influence on the Bukovica river. Storage of any materials and disposal of waste is not allowed within the water protection zones of the Bukovica river
	Maintenance and washing of construction machinery and vehicles is not allowed at road construction sites
	The disposal of excavated material should be carried out exclusively at designated organized disposal sites
	Waste management shall be carried out in accordance with the Waste Management Plan
	Avoid any activities outside the construction site zone, especially in the area of possible impacts on the hydrological and ecological conditions of the Bukovica river as well as other watercourses
Carry out constant supervision over the execution of project activities in order to prevent impacts on water and take all protective measures, records must be maintained against which corrective actions are taken;	
It is mandatory to educate all workers involved in road construction project activities about their possible impacts on water, consequences and measures to avoid impact on the hydrological and ecological conditions of watercourses, so that each worker accepts his responsibility for water protection.	

Table 8. Potential impacts on biodiversity and mitigation measures

	Mitigation measures
<p>Impact</p> <p>The construction of a 24.5 km long road, of which 15 km requires the construction of a road along a route designed through a forest area, and the construction of a planned freight road may have the following impacts on biodiversity:</p> <ul style="list-style-type: none"> • Construction of a transport road may cause a barrier effect or increase the risk of collision with larger mammals/predators and disturbance of other wild animals; • Dust created by the movement of trucks (deposition of dust on terrestrial and aquatic vegetation, and reduced productivity of plants within the 	Vehicle access to the project areas will be reduced to a minimum, as much as possible bus rides should be organized
	Vehicle speeds on access and transport roads will be controlled (max. 15 km/h on unpaved roads) to reduce dust emissions and risk of animal mortality
	Instructions on driving safety and respecting speed limits will be included in the education of new employees and the annual training for all employees, including the training of specific tasks for the given workplace;
	Vehicles deemed to have the potential to introduce invasive plant species or spread existing invasive plants to areas where they do not currently occur will

<p>deposition zone. In addition, habitat suitability for amphibians will also decrease in the zone of construction works and dust deposition);</p> <ul style="list-style-type: none"> • Vehicle exhaust emissions including: NO_x, SO_x, CO, CO₂ and diesel particles and road dust. It is predicted that more significant deposits and associated changes in the natural vegetation will occur in the zone along the roads up to a maximum distance of 50 m from the edge of the road Rupice - Tisovci; • Traffic on access roads - disruption of animal populations and barrier effects; • Dust emissions - suffocation of vegetation, contamination with pollutants and reduced productivity; • Noise, light and disturbance - grouse and large mammals may be displaced from the area around the construction site, as the noise and disturbance are 24 hours a day. Brown bear, lynx, gray wolf and wild cat are likely to avoid passing through the construction area altogether; • Runoff from access roads to locations from the direction of Kakanj and Podlugovi into watercourses and runoff from the construction site of the Rupice - Tisovci freight road. 	be washed prior to entering the site or current weed-free sites (wash water must be of acceptable quality)
	Maintain the surface of all transport roads in good condition and introduce a speed limit
	Transport routes will be well maintained and where steep gradients are required operators will be trained to minimize engine noise by avoiding unnecessary turning and handling
	The start-up of the vehicles and equipment will be done with care to avoid simultaneous noise impacts
	All vehicles will be fitted with reversing alarms, set to the lowest level, in accordance with health and safety concerns
	Operators and drivers of machinery and mobile equipment will be instructed in the appropriate use of headlights to reduce the impact on wildlife
	Work should be carried out outside the zones of influence on watercourses in order to preserve the natural condition of the banks and riverbeds and prevent the impact on hydrological and ecological conditions
	Taking measures to prevent any runoff into watercourses and pollution of watercourses due to preventing impacts on aquatic habitats that are classified as PBF as they support endangered and protected species
	Education/notification of persons responsible for taking additional protection measures in sensitive areas and supervision of mitigation measures execution

5. MONITORING AND REPORTING

the implementation of the traffic management plan must be regularly monitored during the construction phase to ensure its continued effectiveness and the achievement of the objectives set forth in this Plan, which includes:

- Regular inspections of all roads used for the purposes of the project and maintenance plan by the person responsible for carrying out actions related to traffic management;
- Daily monitoring of driver behavior and taking corrective measures;
- Regular daily visual inspections of vehicles in order to eliminate observed defects that could cause negative impacts on the environment;

- Regular ongoing maintenance and servicing of vehicles in order to mitigate the impact on the environment;
- Exclusion of vehicles and/or work machines that are found to cause excessive/uncontrolled impacts on the environment, until the observed deficiencies are resolved;
- Review of complaints and concerns of the local community and other participants regarding traffic flow;
- Monitoring of biodiversity, especially dust deposition on vegetation and animal habitats;
- Monitoring of biodiversity in aquatic habitats in the construction zone;
- Inspections of culverts, drains and drainage channels for sedimentation;
- Annual trainings for drivers and operators of construction machinery in order to minimize negative impacts on the environment;
- Regular updates of the traffic management plan;
- Renewed trainings;
- An incident investigation process, which ensures effective controls are in place;
- Regular consultations with workers on site

The vehicle tracking system will be established during the construction phase of the Project. There is currently a description of general safety measures at work for all employees of Eastern Mining, as well as for all other subcontractor workers (No. 274/2021 dated March 2, 2021), and it partly refers to proper and safe driving, which includes the prohibition of alcohol and wearing seat belts. The company has developed and adopted documents and procedures that regulate all issues, rights, obligations and restrictions regarding driving safety in accordance with all legal regulations of Bosnia and Herzegovina, as well as recommendations and guidelines at the international level. A sample checklist for subjects that will be covered during inspections is given in attachment 1 of this Plan.

The following table presents a proposal for a monitoring plan that needs to be undertaken during the construction phase of the Vareš Project.

Table 9. Monitoring plan

Activity	Frequency	Responsibility
Verification of the fulfillment of all requirements from the Traffic Management Plan during the construction phase	Before start of works and during execution of the works	Site manager
Temporary traffic schedule management control	Every day when the construction site is active	Person responsible for traffic
Keeping records of all traffic management schedules	Daily	
Audit of traffic management during the construction phase in accordance with the Traffic Management Plan according to the checklist from Annex 1	Weekly	Traffic supervisor

6. TRAINING

The required number of trainings will be provided for all employees of Eastern Mining d.o.o. Vareš related to traffic during the construction phase, and then environmental protection and social management as well as for all relevant subcontractors involved in traffic activities during the construction phase. All possible tools and best solutions for traffic management will be discussed among employees and subcontractors. Training material will be created and updated by the Environmental and Social Management team.

Staff training must be conducted in accordance with a special training program aligned with this Traffic Management Plan, including familiarization with the specifics of the Project significant for traffic management and:

- Information about the Vareš Project related to traffic management and the safety of construction site personnel and other users of public roads;
- Roles and responsibilities of Project participants, including individual responsibilities related to traffic management and safety;
- Hazards during the construction phase, including weather, driving and drinking water on the construction site, etc.;
- Accident prevention and mitigation procedures;
- Basic aspects of the Traffic Management Plan in the construction phase, especially works that have an impact on public roads and access to private real estate;
- Performance in incident cases in accordance with the Emergency Preparedness and Response Plan;
- Caring for local communities affected by the project and travelers on public roads in the project construction zones.

Only persons who have undergone initial training in the field of occupational safety, environmental and fire protection can enter the construction sites, according to the elements mentioned above.

Regular internal inspections will be carried out to ensure that measures for prevention and mitigation of negative environmental impacts, which are listed in this Plan, are responsibly applied and improved during the construction phase.

7. PLAN REVIEW AND UPDATE

Monitoring results will be reported to responsible parties to ensure that all project activities are carried out and implemented in accordance with national legislation and international standards.

The Traffic Management Plan will be updated as needed and at least once a year by the project team.

Updating the Traffic Management Plan should take into account the following:

- Any significant change in construction activities or construction methods;
- Key changes in responsibilities of project team members;
- Inspection results, monitoring and reporting procedures associated with monitoring of significant impacts of project activities during construction phase;
- Comments and recommendations of local community representatives or subcontractors;
- Inspection results related to the impact on the environment and local communities and
- Pending appeals and any corrective actions resulting from appeals.

8. COMPLAINTS AND INCIDENTS

The responsible persons of the company and the site manager and traffic supervisor must consider all complaints registered during the construction phase. Corrective actions must be prescribed and implemented for all justified complaints.

All incidents registered by project team personnel responsible for supervising the execution of project activities must be recorded on appropriate forms that must be available to the Traffic Supervisor and Safety Manager. The need to investigate the cause of the incident is determined by the safety manager.

The construction site manager is responsible for the implementation of corrective actions, who should ensure the necessary number of trained personnel for the implementation of corrective actions.

Complaints are submitted in electronic or printed form on Complaint Submission Form available at: <https://www.easternmining.ba/downloads/corp-governance-files-/zalbeni-obrazac-v2.pdf>, according to the Complaint Mechanism Procedure available at the following company link: <https://www.easternmining.ba/downloads/corp-governance-files-/grievance-mechanism-process-final-bos.pdf>.

Review date: _____

Annex 1.

Inspection location: _____

Control measure	Compliance (Yes/No)	Comment
Is there a Traffic Management Plan and is it reviewed regularly?		
Do all workers comply with traffic management rules defined by the Traffic Management Plan?		
Are reasonable speed limits in place and are they being followed?		
Do all drivers check their loads before leaving the site and entering traffic?		
Do all drivers respect the speed limits in urban areas and settlements?		
Is the ban on the movement of heavy vehicles in the settlements of Pogar, Semizova Ponikva, Vareš Majdan, Bijelo Borje and Tisovci respected even in the night hours from 10:00 p.m. to 6:00 a.m.?		
Do all vehicles have adequate lights for night driving and periods of low visibility?		
Are drivers and machine operators regularly trained on road safety aspects and traffic rules specific to project activities (risks to local communities, speed limits, work site boundaries) and driving skills?		
Do all vehicles undergo periodic maintenance and inspections?		
Is dust suppression carried out without delay and as needed?		
Is the suppression of the uncontrolled dust emission of material scattering during transport effective?		
Are hard-surfaced roads, built in sensitive areas, maintained to reduce noise and dust emissions?		
Do all drivers record observations of animals on the road route and do they inform the manager of traffic and the environment sector about it?		
Is the snow cleared during the winter months on the access and transport routes?		
Is maintenance of transport and access roads carried out?		
Is spraying on unpaved roads in order to maintain surface humidity and prevent uncontrolled dust emissions, carried out?		
Are speed limits and off-road driving prohibitions respected and are established project safety rules followed?		
Whether appropriate vehicle emission control equipment is installed and maintained in good working order		
Is vehicle access to project areas minimized?		
Is waste managed in accordance with the Waste Management Plan?		
Does the development of traffic cause negative impacts on biodiversity and natural habitats?		