



**ADRIATIC METALS BH D.O.O.
VAREŠ**

PROJECT VAREŠ – POLYMETALLIC MINE

TRAFFIC MANAGEMENT PLAN

June 2023

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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
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Revision record

Revision	Status	Date	Update/change details
V3.0	Chapter 1.1. Project location and setting	17/04/23	A description of the location and basic technical characteristics of the freight road Rupice - Tisovci is given
V3.0	Chapter 1.2. Purpose and scope of the Traffic Management Plan	17/04/23	The purpose and scope of the Traffic Management Plan was innovated. A new map has been included showing the final route of the Vareš Project
V3.0	Chapter 2.1. Special requirements from permits that apply to the project	17/04/23	Minor correction of the chapter due to the exclusion of the need to create a Plan for the construction phase (because it has been done) and minor corrections of conditions in order to harmonize with the Project and other plans
V3.0	Chapter 2.2 National legislation	17/04/23	3 Environmental Laws, which were used in the preparation of this Plan, were added
V3.0	Table 1. Roles and responsibilities	17/04/23	The names of the Executive Director and the Person Responsible for Occupational Safety have been changed
V3.0	Chapter 4. Traffic Management and Mitigation Measures	17/04/23	Described in more detail through 2 sub-chapters in order to harmonize with the changes of the Project: 4.1. Traffic management and measures to mitigate the impact on traffic safety and 4.2. Environmental impact and mitigation measures
V3.0	Table 2. Potential impacts of noise and vibration on the environment and mitigation measures	17/04/23	Smaller correction of measures in order to harmonize with the changes of the Project and more efficient management of measures to mitigate the impact of noise and vibrations on the environment, local population and biodiversity
V3.0	Table 3. Potential impacts on society and mitigation measures	17/04/23	Minor correction of measures in order to harmonize with the changes of the Project and more efficient management of measures to mitigate the impact on society
V3.0	Table 6. Potential impacts on soil and mitigation measures	17/04/23	Some other impacts on the soil and mitigation measures have been added in order to more effectively protect the soil and land due to the protection of biodiversity and indirectly water
V3.0	Table 7. Potential impacts on water and mitigation measures	17/04/23	A table of potential impacts on water and mitigation measures was added, which was not in the previous version, to achieve more efficient protection of watercourses and their services
V3.0	Table 8. Potential impacts on biodiversity and mitigation measures	17/04/23	Some more impacts on biodiversity and mitigation measures have been added in order to more effectively protect biodiversity, especially the protection of aquatic habitats.
V3.0	Table 9. Monitoring plan	17/04/23	Table 9 defines the monitoring plan for more efficient traffic management
V3.0	Chapter 6. Training	17/04/23	It was added that the training should be conducted in accordance with a detailed training plan that includes the information provided in this chapter.
V3.0	Chapter 7. Plan review and Update	17/04/23	In this chapter, it is added what any update of the TMP should take into account and what it should be based on
V3.0	Chapter 8. Complaints and Incidents	17/04/23	Added chapter 8. Complaints and incidents, which includes the procedure for submitting complaints

1. INTRODUCTION

1.1. Location and setting of the project

Adriatic Metals BH d.o.o. is owned and managed by Adriatic Metals PLC and is located in Bosnia and Herzegovina (BiH). Adriatic Metals BH 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.

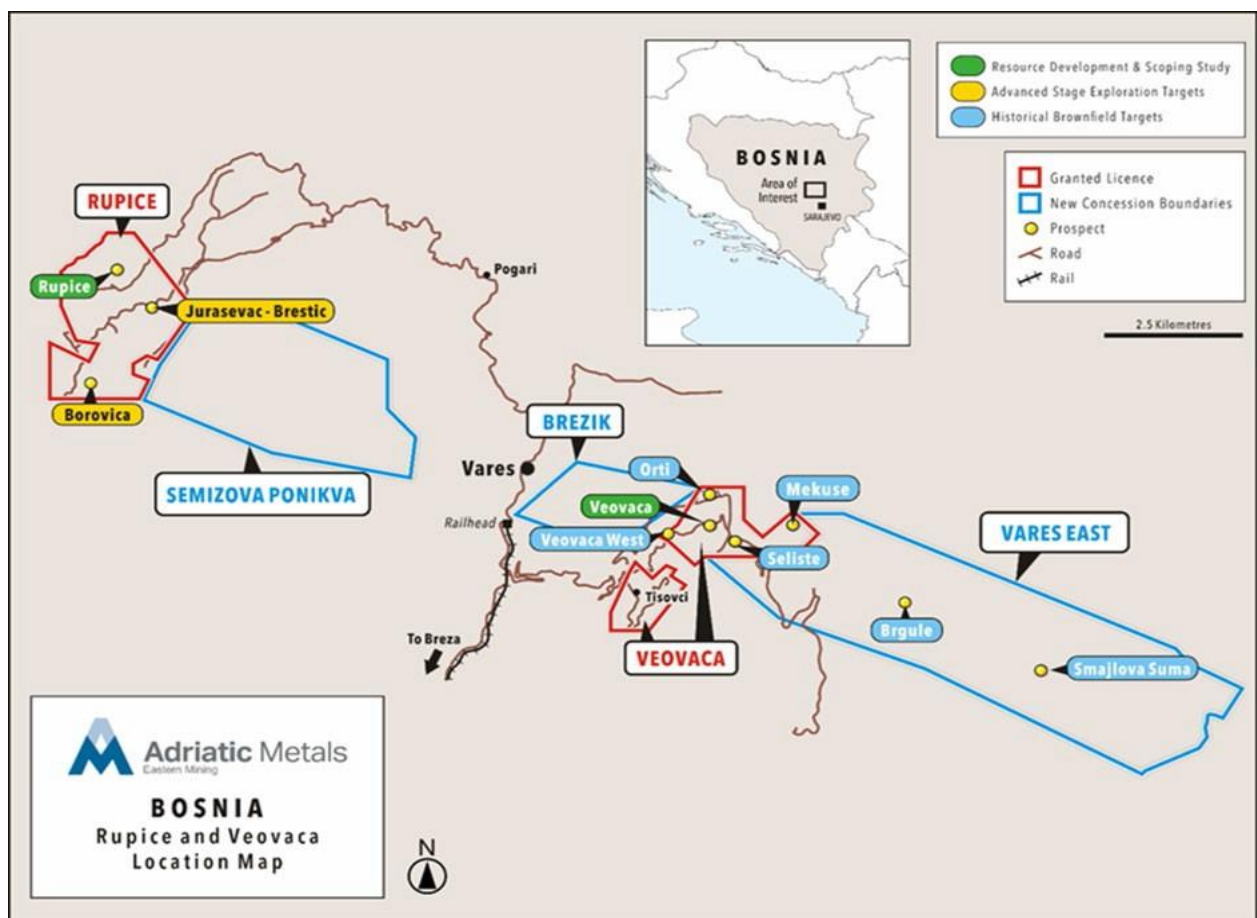


Figure 1. Map showing the location of the Vareš Project

The Project locations are placed 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 R444 through the mining town of Breza from the A1 highway and if necessary, it is also possible from the mining town of Kakanj via the regional road R466, which is mostly asphalted and a smaller part is a macadam road, which will be used only in exceptional cases for the eventual delivery of raw materials or for access to fire engines and ambulances etc.

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

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 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 Pržići and Tisovci, where the ore processing plant is located. Transportation of ore, waste and other materials from the location of the Rupica mine to the location of the ore processing plant in Tisovci and vice versa from the location of Tisovci to the location of Rupica is carried out exclusively by the newly built freight road for the needs of the project. The freight road Rupice - Tisovci predominantly passes through the newly built section for the needs of the project, and on the smaller section (Vareš Majdan - Bijelo Borje) it passes through the existing public asphalt road

Trucks with a capacity of up to 50 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 transporting workers, raw materials, auxiliary materials and fuel, service vehicles and equipment for plant and equipment maintenance.

The basic technical characteristics of the freight road Rupice - Tisovci are as follows:

- roadway width $b = 7.0$ m,
- embankment width 0.50 m, (in sanitary protection zones 1.00 m and 0.50 m)
- berm width 0.50 m,
- minimum radius of horizontal curves $R_{min} = 10$ m,
- expansion of the notch due to an oversized load on both sides depending on the radius of the bend,
- longitudinal slope of the road for macadam pavement $i_{max} = 12\%$,
- cross slope for macadam pavement $q = 4\%$ in direction and curves ($V = 30$ km/h).

The road is designed to ensure the safe traffic of heavy vehicles, and on the part of the route outside the water protection zones and settlements, it is designed as a macadam type of roadway, while on the part that passes through the water protection zones on the Bukovica river and the settlements, the final layer of asphalt and drainage into separators was built.

The ground-plan geometry of the road was adapted to the terrain conditions as well as to the technical characteristics of the vehicle in such a way that circular curves with a radius sufficient for unhindered traffic in both directions were used. In order to overcome the large height difference, the route was designed with a large number of horizontal curves. For the same reasons, serpentine with a minimum radius of radius $R = 12$ m were designed, and in places where the field conditions are limiting, a curve radius of $R_{min} = 10$ m was applied.

The projected width of the traffic surface is 7.00 m, (basic profile of the road in the direction). Due to the low speeds of transport vehicles (trucks), a direct transition from a straight line to a circular curve is allowed, without a transition curve. The conditions for the movement of special

vehicles in curves require a certain road width depending on the radius of the horizontal curve, and the road widths in curves are adapted to this condition. In accordance with the needs of the transport vehicle, in all curves $R < 200$ m, the necessary widening of the road was carried out, for the safe passage and passing of the transport vehicle.

The route for the transport of ore, raw materials, tailings, waste materials and workers between the Rupica mine sites and the Tisovci ore processing plant is designed to avoid local communities and sensitive areas (water intake protection zones on the Bukovica River and other sensitive areas) as much as possible as it is possible, especially on the section from the town of Vareš to the location of the Rupice mine. Given that the freight road, in addition to transport for the needs of the Rupica mine and the Tisovci ore processing plant, is also used for public use as a public road, traffic signals will be installed to warn users of the presence of heavy vehicles on the road. The calculated speed for the newly designed road Rupice - Tisovci is 30 km/h, and this road belongs to the D category

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 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 is a living document and will be regularly reviewed, improved and coordinated with the needs of the project regarding significant changes and the need to define additional measures to mitigate the impact on the environment and society as well as measures for more efficient traffic management.

Company Adriatic Metals BH 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 for measures and goals from this Traffic Management Plan to be realized and successfully implemented, it is necessary to harmonize the transport of ore, materials, raw materials and people with the conditions of traffic on public roads in order to plan, organize and carry out transport in such a way as to avoid and / or minimize the impact on public traffic and the environment along transport routes. Oversized and special loads should be planned, organized and carried out 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,
- Waste and hazardous waste management plan;

- Hazardous materials management plan and
- Air quality management plan.

The traffic management plan during the construction phase is aligned with the applicable national regulations of the Federation BiH and the Zenica-Doboij Canton, and with the requirements of international financial institutions, such as IFC performance standards, EBRD requirements and other applicable international good industry practices (GIIP).

The traffic management plan is living document and responsibilities and compliance procedures should be updated as necessary in case of significant changes or at least once a year.

The following picture shows the route of the freight road from the location of the Rupica mine to the location of the Tisovci ore processing plant, which transports ore and other materials from the Rupica mine to the ore processing plant at the Tisovci location, as well as tailings, raw materials, fuel, explosives, and people from Tisovci or from regional road R444 to the Rupice.

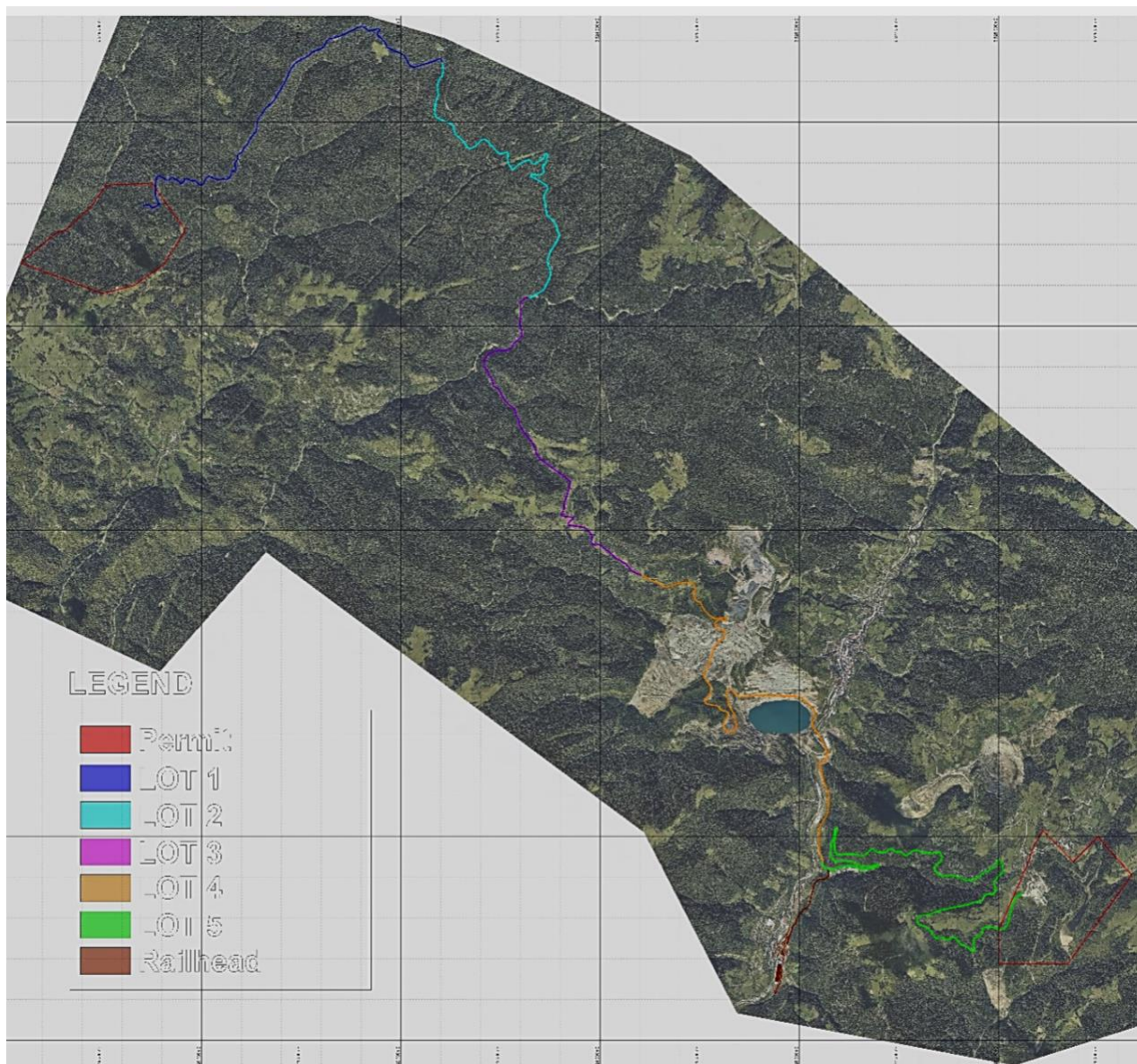


Figure 2. Map showing the route of the Vareš Project

2. REGULATORY REQUIREMENTS AND STANDARDS

Adriatic Metals BH 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), 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 use and movement of vehicles and machinery on defined transport routes through contractual obligations with the subcontractor, with mandatory compliance with safety provisions and legal regulations and measures from this plan;
- In order to reduce the risk of accidents, install and maintain traffic warning signs that limit the speed of vehicles and other warnings and notices on the freight road and access roads;
- Undertaking and implementing traffic management measures in accordance with this Plan as well as measures and goals from 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	<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	<ul style="list-style-type: none"> • Implementation of the Traffic Management Plan in 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 on traffic safety 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 was assessed as a potential impact on local traffic and local roads, especially in the period of more frequent transport of ore, tailings, raw materials and people, especially on the freight road Rupice - Tisovci as well as on the regional road R444a that intersects with the freight road near Mrestilište and the regional road R444 which is used as the main access road to the project sites. This 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 could occur on the freight road, which is also used as a public road, as well as on the access roads used by the local population and other users. Increased risks may occur on sections through settlements, and on the section where the freight road crosses the regional road R444a near Mrestilište, as well as on some sections of Vareš Majdan - Bijelo Borje road due to sharp curves, concrete protections/culverts and the road use of local residents and other users. A higher volume of traffic due to the transportation of ore, tailings, raw materials and people could cause unwanted phenomena 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 can affect environmental pollution and endanger ecological conditions in natural habitats if incident situations occur in sensitive areas (the Bukovica river, the habitat of hydrophilic vegetation of tall greens, mountain meadows, 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 forest.

As part of traffic management, it is necessary to ensure communication with traffic participants for any change in traffic (e.g. traffic changes due to construction works, traffic accidents, landslides on the road, scattering of materials, run-over animals, etc.) by applying adequate means, notifications and placing temporary warnings/notifications.

When transporting large and oversized loads, measures must be taken to organize such transport in order to minimize disruption to public traffic.

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 accident and transportation to the Health Center in Vares or Kakanj, i.e. to Cantonal Hospital Zenica. 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 in order to obtain approval for the temporary closure of the road (Municipality of Vareš for local roads and Regional Roads Directorate of Ze-do Canton).

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, possible oil and fuel leaks, spillage of materials during transportation and incident situations.

Noise and vibration produced by trucks moving on the freight road and access roads can affect the environment and sensitive receivers in the immediate vicinity of the freight road. The freight road predominantly passes outside the populated areas and only on the section that passes through Semizova Ponikva can we expect impacts on individual houses located closest to the freight road. Likewise, the freight road was designed and built outside of sensitive areas that are roosts for large animals and bats. Noise impacts are possible on large animals and birds, and vibrations on bats in certain sections, for which mitigation measures have been proposed. All noise effects in the vicinity of the freight road and access roads occur discontinuously during the passage of the truck, especially through the forest area.

In the case of the need to apply additional measures to mitigate the impact of noise on sensitive areas and the environment after the initial phase of road exploitation and assessment by the persons responsible for the environment, appropriate measures should be taken according to the recommendations and under the supervision of the person responsible for the environment, such as the installation of panels or embankments or tall plants, i.e. natural or artificial barriers along the freight road to ensure additional noise reduction between transport trucks and the nearest community in potentially threatened areas.

Considerations of potential air pollutant emissions caused by traffic on freight road and access roads are categorized as:

a) Fugitive dust - Particles created by the transport of ore, tailings and other materials as well as transport on unpaved road sections can affect local air pollution in dry, sunny and windy weather due to the movement of vehicles and machinery. The erosive action 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 dispersed into the environment. The emission of this dust depends on the technical characteristics and quality of roadway maintenance, meteorological conditions, traffic intensity and the measures taken to prevent the development of dust from the roadway and the maintenance of freight vehicles. The dispersion and deposition of this dust depends on the size of the particles, relief, vegetation cover and meteorological conditions. The erosivity of the pavement depends on the number and size of the wheels, the speed of the vehicle, the moisture content of the surface material of the pavement, the characteristics of the

pavement (macadam or asphalt) and meteorological conditions.

Additional dust mitigation and control measures from traffic roads will be used to suppress uncontrolled dust emissions, as specified in this Plan and the Air Quality and Greenhouse Gas Emissions Management Plan, which includes:

- 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, especially on gravel road sections. In addition, appropriate equipment and employees will be engaged for the maintenance of road surfaces used to transport raw materials and other materials in order to prevent and mitigate uncontrolled dust emissions on the freight road.
- 2. Speed limits and off-road driving** - Establishing and enforcing safety rules, including enforcing speed limits on the freight road and access roads and limiting off-road driving to the greatest extent practical will limit the potential for additional fugitive dust emissions as well as public safety hazards. Those employees whose jobs include driving, as well as transport contractors, must be informed about the safety rules and the prohibition of off-road driving. Instructions on driving safety and compliance with speed limits must be included in the orientation and responsibility of all new employees and the annual (refresher) training related to the fulfillment of tasks for each workplace position related to the traffic.
- 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 freight road 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 order to avoiding and mitigating the negative impacts of traffic on the environment, including control measures based on which corrective measures are taken in accordance with this Traffic Management Plan, as well as the Air Quality Protection Management Plan, the Water and Wastewater Management Plan and the Action Plan for Biodiversity.

The following tables show potential impacts on the environment and mitigation measures in the operational phase.

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

Impact	Noise and vibration emanating from supply trucks when traveling on public roads	Mitigation measures
		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 Establish speed limits in relation to road conditions and the location of sensitive receptors, such as populated areas Ensure continuous traffic flow to minimize the long-term idling of the drive motors

Table 3. Potential impacts on society and mitigation measures

Impact	Transport vehicles will use the freight road and designated access roads; More intensive use of the designated transport roads and increased number of vehicles on the transport roads intended for the transport of ore, tailings, raw materials, other materials and people; The use of freight vehicles could have an impact on the existing road network throughout the project area; It should be noted that some local roads have been improved in the areas used for the project, such as the roads for the villages of Pržiče and Pogar; There will be a combined impact of the transport fleet, buses for employees,	Mitigation measures
		Timely publication of the Traffic Management Plan 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 and special training for carriers to ensure the implementation of the plan Contact of the Manager for Logistics/Transport and clear definition of the traffic route as agreed Inform all drivers about speed limits in populated areas and sensitive areas (game migration routes) Placement and maintenance of notification and warning traffic signs in appropriate places

<p>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;</p> <p>Parking spaces in the city of Vareš are already limited and will be additionally burdened due to the increased number of users. The construction of an employee park and ride 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>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 to access roads should be organized and carried out by announcing the planned transport, preferably at night and under organized escort.</p>
	<p>Clearing snow during the winter months on the freight route, access roads</p>
	<p>Repair of damage on used access and transport roads.</p>
	<p>Special periodical training of carriers will be conducted regularly in order to prevent and mitigate the impact on traffic and the environment</p>

Table 4. Potential air quality impacts and mitigation measures

		Mitigation measures
Impact	<p>Fugitive dust caused by the movement of trucks;</p>	<p>Wetting unpaved roads with a moderate amount of water to maintain surface moisture in order to prevent dust emissions</p>
		<p>Maintenance of freight road sections near residential areas and near sensitive habitats in order to prevent uncontrolled dust emissions</p>
	<p>Fugitive dust created by cargo trucks on transport roads;</p>	<p>Adequate equipment and trained employees for the maintenance of surfaces on the freight road to mitigate the development of dust</p>
		<p>Speed limits and off-road driving limitation. Establishing and implementing the security rules of the Project</p>
	<p>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;</p>	<p>Limit off-road driving unless absolutely necessary</p>
		<p>Reduce the number of trips with efficient loading procedures for transporting materials as much as possible</p>
		<p>Apply stabilization agents on road sections with high dust emissions</p>
		<p>Covering or wetting the surface of the bulk cargo of the truck in order to prevent dust emission during driving</p>
		<p>Maintenance of gravel/laterite covering on unpaved roads</p>
	<p>Vehicle exhaust (diesel driven), with emissions including NO_x, particulate matter (PM₁₀) and CO₂.</p>	<p>Provide sections of the road with a hard surface near residential locations, mountain meadows and hydrophilic vegetation of tall greens in Semizova Ponikva</p>
		<p>Introduce speed limits for heavy equipment and other road users on unpaved roads</p>
		<p>Regularly maintain vehicle emission control equipment</p>
		<p>Regularly maintain and inspect vehicles and mobile equipment, including their emission control systems in order to reduce the emission of pollutants into the air.</p>

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

		Mitigation measures
Impact	Vehicle exhaust (diesel driven), containing NO _x , particulate matter (PM ₁₀) and CO ₂ , including: - road vehicles for transporting ore and materials, - off-road vehicles for ore extraction, - transportation of employees in their own vehicles and by bus 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

		Mitigation measures
Impact	Traffic on freight roads and access roads, transport of ore, tailings, raw materials, fuel, chemicals and workers; Land in the immediate vicinity of the road where pollution may occur due to the deposition of emitted substances, uncontrolled spillage/leakage; Movement and parking of vehicles on the ground outside the designated roads and parking lots; Accidental spills of chemicals, oil and fuel during transport; Uncontrolled leaks and runoff from construction sites and roads; Uncontrolled disposal, scattering and storage of waste. Traffic accidents/accidents in which fuel and oil may leak and be released onto the ground and into water	Soil that is not contaminated with polluting substances will be stored with special attention to the appropriate locations determined by the project and the instructions of the construction site manager, because it can be reused for embankments, landscaping, remediation of abandoned spaces after the completion and closure of the Project
		Use efficient vehicles with reduced emissions
		Regular quality maintenance of transport vehicles in order to prevent uncontrolled leakage of oil and fuel
		Exclusion of construction machinery and vehicles from operation until the causes of leakage are eliminated;
		Measures during the transport of chemicals, fuel and other hazardous materials defined by the Hazardous Materials Management Plan;
		Cleaning and removal of loose chemicals, oil and fuel with a layer of contaminated soil at the site of incident soil contamination using a suitable absorbent (sawdust, sand, etc.) and disposed of as hazardous waste according to the Waste and Hazardous Waste Management Plan
		Liquid fuels, lubricants and other materials can only be stored in dedicated and equipped warehouses

Table 7. Potential impacts on water and mitigation measures

		Mitigation measures
Impact	<p>Traffic on freight roads and access roads, transport of ore, tailings, raw materials, fuel, chemicals and workers;</p> <p>Land in the immediate vicinity of the road where pollution may occur due to the deposition of emitted substances, uncontrolled spillage/leakage;</p> <p>Movement and parking of vehicles on the ground outside the designated roads and parking lots and near watercourses;</p> <p>Accidental spills of chemicals, oil and fuel during transport;</p> <p>Uncontrolled leaks and runoff from roads;</p> <p>Uncontrolled disposal, spillage during transport and uncontrolled storage and disposal of waste;</p> <p>Traffic accidents in which fuel and oil may leak and run off on the surrounding land;</p> <p>Functional control, cleaning and maintenance of the oil/water separator;</p>	Regular high-quality maintenance of transport vehicles in order to prevent uncontrolled leakage of oil and fuel
		Exclusion of transport vehicles from traffic until the causes of uncontrolled oil and fuel leakage are eliminated
		Taking and carrying out measures during the transport of chemicals, fuel and other hazardous materials defined by the Hazardous Materials Management Plan
		Cleaning and removal of bulk oil and fuel with a layer of contaminated soil using suitable absorbent material (sawdust, sand, etc.) and disposal as hazardous waste in accordance with the Waste and Hazardous Waste Management Plan
		Parking of vehicles in suitable places outside the zones of influence on watercourses
		Regularly maintain the system of drainage and purification of rainwater from the roadway (oil/water separators) in order to prevent the discharge of muddy and oily water into watercourses and their impact on the quality of watercourses and aquatic habitats
		All bulk material during transport should be cleaned and removed in such a way that the usable material is returned to the processes and the waste material is disposed of in accordance with the Waste Management Plan
		Any uncontrolled leakage and spillage of oil and fuel on the freight road on sections where storm water is not drained from the roadway must be remedied by cleaning and disposal in accordance with the Waste and Hazardous Waste Management Plan
		Control, cleaning and maintenance of drainage systems and separators in order to maintain them functionally and protect water, and dispose of the collected material according to the hazardous waste disposal procedure, of which records should be kept
		Transport in the Bukovica river basin should be carried out with maximum care and any spillage of materials and leaks should be immediately reported to the sustainability sector, the road maintenance sector and the traffic sector in order to eliminate the consequences (cleaning and removal of loose materials and substances) in the shortest possible time.
		Waste management shall be carried out in accordance with the Waste and Hazardous Waste Management Plan
		Avoid and prevent the movement and parking of vehicles outside defined parking lots and roads, especially in areas of possible impact on the ecological conditions of watercourses
		Regularly supervise traffic on the freight road in order to prevent impacts on the water and take all protective measures, which must be recorded, on the basis of which corrective measures are taken.

Table 8. Potential impacts on biodiversity and mitigation measures

		Mitigation measures
Impact	<p>Exploitation of 24.5 km of freight road, of which 15 km passes through a forest area, may have the following impacts on biodiversity:</p> <ul style="list-style-type: none"> • The use of a freight road causes a barrier effect and increases the risk of collisions with larger mammals/predators and disturbs other game, birds and other terrestrial fauna.; • Dust created by the movement of trucks (deposition of dust on terrestrial and aquatic vegetation, and reduced productivity of plants within the deposition zone. In addition, habitat suitability for amphibians will also decrease in the zone of influence of the exploitation of the freight road, the emission of exhaust gases and the deposition of dust); • Vehicle exhaust emissions including: NOx, SOx, 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 and light 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 completely avoid passing through the freight road area; • Runoff from freight road into watercourse 	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
		Regular high-quality maintenance of transport vehicles in order to prevent uncontrolled leakage of oil and fuel and to reduce the emission of exhaust gases
		Wetting macadam roads in order to prevent uncontrolled dust emission and impact on vegetation
		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 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 driving
		The start-up of the heavy vehicles 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
Truck drivers will be instructed on the appropriate use of headlights (high and low beams) to reduce the impact on wildlife and terrestrial fauna.		
Taking measures to prevent any runoff into watercourses and pollution of watercourses due to prevention of impact on aquatic habitats classified as PBF		

		Control and maintenance in the functional condition of crossings (ecological bridges) and culverts
		Mandatory reporting of any observed crossing of large mammals across the roadway to the sustainability sector in order to take measures in accordance with the BAP
		Any collision or trampling of large mammals and reptiles should be reported immediately to the sustainability department in order to take measures in accordance with the BAP
		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 to ensure its continued effectiveness and the achievement of the goals set out 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 and biodiversity;
- Regular ongoing maintenance and servicing of vehicles in order to mitigate the impact on the environment and biodiversity;
- Exclusion of vehicles 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 zone of influence of the freight road;
- Inspections of culverts, drain and drainage channels and internal drainage systems and the functional state of separators;
- Reviews of the functional condition of crossings (ecological bridges) and culverts;
- Annual driver training 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

A monitoring 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 BiH and the Federation of BiH, 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.

Table 9. Monitoring plan

Activity	Frequency	Responsibility
Verification of the fulfillment of all requirements from the Traffic Management Plan	Monthly and more often if necessary	Transport manager
Traffic management control	Daily	
Keeping records of all traffic management schedules	Daily	
Audit of traffic management in accordance with the Traffic Management Plan according to the checklist from Annex 1	Weekly	
Technical inspection of transport vehicles with an emphasis on noise production, exhaust gas emissions and oil and fuel leaks	Daily	G&P maintenance coordinator
Control of the functional correctness of the internal drainage system and separator	Monthly and more often if necessary	
Control of the technical correctness of the freight road pavement with an emphasis on suppression of uncontrolled dust emission and noise production	Monthly and more often if necessary	Transport manager

6. TRAINING

The required number of trainings will be provided for all employees of Adriatic Metals BH d.o.o. related to traffic and environmental protection. All possible tools and best solutions for traffic management will be discussed among employees and subcontractors. The training material will be created and updated by the sustainability sector.

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;

- Roles and responsibilities of Project participants, including individual responsibilities related to traffic management and safety;
- Traffic hazards including weather, driving and possible incident situations Accident prevention and mitigation procedures;
- Procedures for preventing and mitigating accidents and incident situations
- 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.

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.

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.

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

- Any significant change in the Project;
- 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

All complaints must be reviewed by the responsible persons of the company and the transport manager. Corrective actions must be prescribed and implemented for all justified complaints.

All incidents must be recorded on appropriate forms that must be available to the Transport Manager, Safety Manager and Sustainability Manager. The need to investigate the cause of the incident is determined by the safety manager.

The transport manager is responsible for the implementation of corrective actions, who should ensure the necessary number of trained personnel for the implementation of corrective actions, which are carried out according to the recommendations and under the supervision of

the transport manager, as well as with the safety manager and the environmental manager if they are related to these two sectors.

Complaints are submitted in electronic or printed form on Complaint Submission Form available at following company link:: <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?		
Do all drivers check their loads before leaving the site and entering traffic?		
Do all vehicles have adequate lights for night driving and periods of low visibility?		
Are truck drivers regularly trained on road safety aspects and traffic rules specific to project activities (risks to local communities, speed limits) 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 freight road and do they inform the manager of traffic and the sustainability manager?		
Is the snow cleared during the winter months on the freight road and the access roads?		
Is maintenance of freight road 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?		
Is appropriate vehicle emission control equipment installed and maintained in good working order		
Is vehicle access to project areas minimized (within technological needs)?		
Is waste managed in accordance with the Waste Management Plan?		
Does the development of traffic on the freight road cause negative impacts on biodiversity and natural habitats (noise, artificial lights, oil and fuel leaks, collisions, trampling, etc.)?		