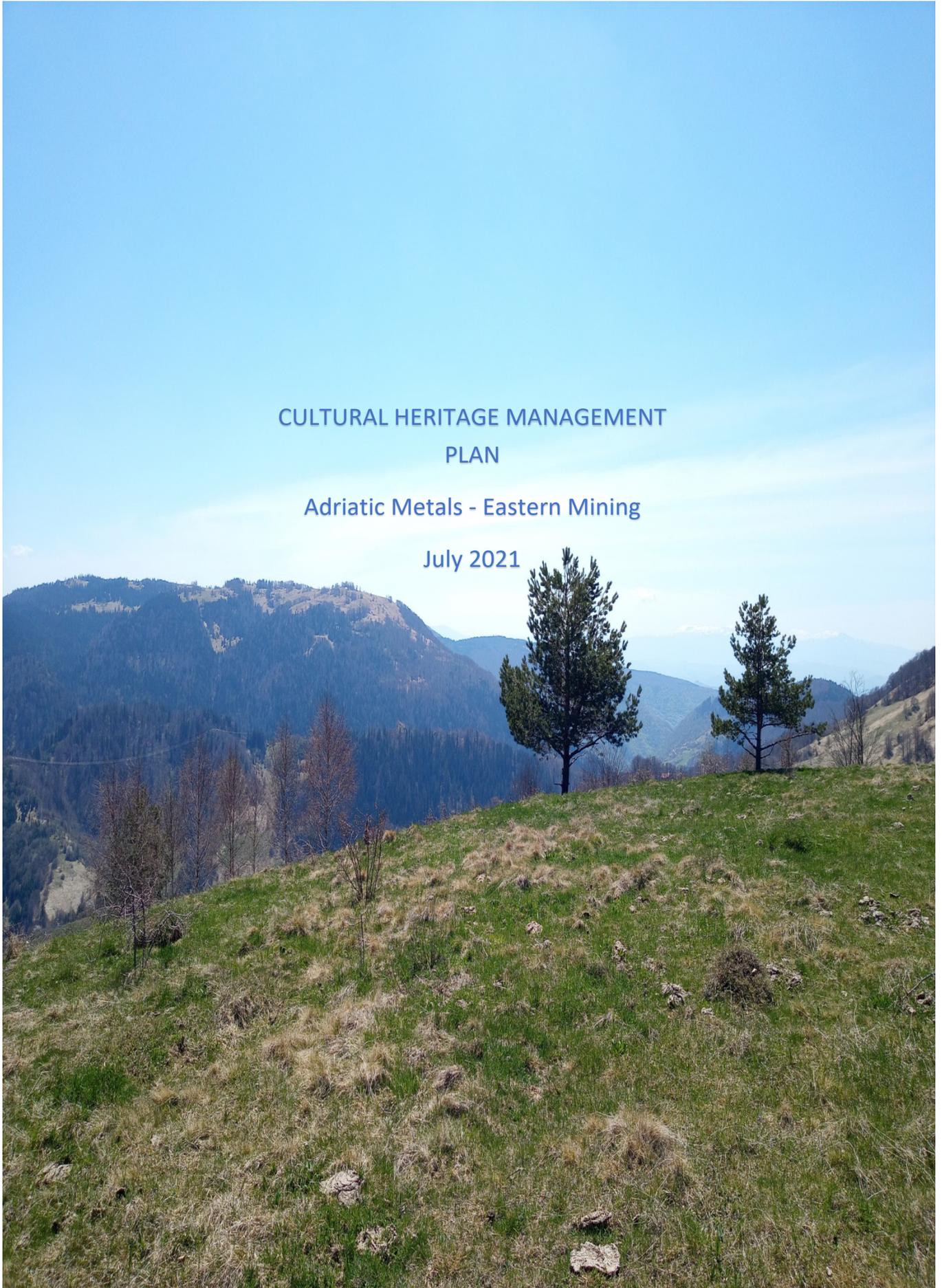


CULTURAL HERITAGE MANAGEMENT
PLAN

Adriatic Metals - Eastern Mining

July 2021



CONTENT

1.0 INTRODUCTION	2
2.0 PURPOSE	3
3.0 ROLES AND RESPONSIBILITIES	4
4.0. MANAGEMENT PLAN FOR SPECIFIC AREA	5
4.1. Management plan approach.....	5
4.2. Implementation.....	5
5.0 PROTECTION OF CULTURAL HERITAGE	6
5.1. Identification and mapping.....	6
5.1.1. Necropolis in Visnjici.....	6
5.1.2. Necropolis Brezik in village Przici.....	7
5.1.3. Necropolis in Donja Borovica.....	7
6.0 CHANCE FINDS PROCEDURE	7
6.1 Training and awareness raising.....	8
7.0 KEY STAKEHOLDERS AND CONTACTS	9
8.0 GRIEVANCE MECHANISM	9
8.1 Grievance mechanism process.....	10
8.2 Key objectives of the grievance mechanism process.....	10
9.0 COMPLAINT FORM	11
10.0 NOTES	12
11.0 LITERATURE	12

FIGURES

Figure 1.1. Map showing the location of the Vares Project	2
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ANNEXES

Annex 1. Detailed information on all tombstones with the necropolis of Brezik, Donja Borovica and Visnjici.....	12
Annex 2. Position of the registered necropolises of Donja Borovica, Brezik, Visnjici as well as the Trial trenches and probes	23

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1.0 INTRODUCTION

Eastern Mining d.o.o. is the holder of a concession for exploration and exploitation in Vares (BiH). It is owned by Adriatic Metals, a company listed on the Australian and London Stock Exchanges. Since 2017, Eastern Mining has been conducting research at several sites in the municipality of Vares, for the first time since the 1980s. The company's focus is on exploring minerals that have the potential to grow the company. The ultimate goal is to revive the mining industry in the municipality of Vares, by exploiting new and existing ore deposits. New potentials have been identified in Veovaca and Rupice, where research and exploitation of lead, zinc and barite have been carried out before. The deposits were further expanded and subjected to extensive research and contained significant amounts of lead, zinc, silver, gold, copper and barite. The project has attracted reputable foreign investors in BiH. In many ways, this research project is unique in post-war BiH, both in terms of investment size and development potential.

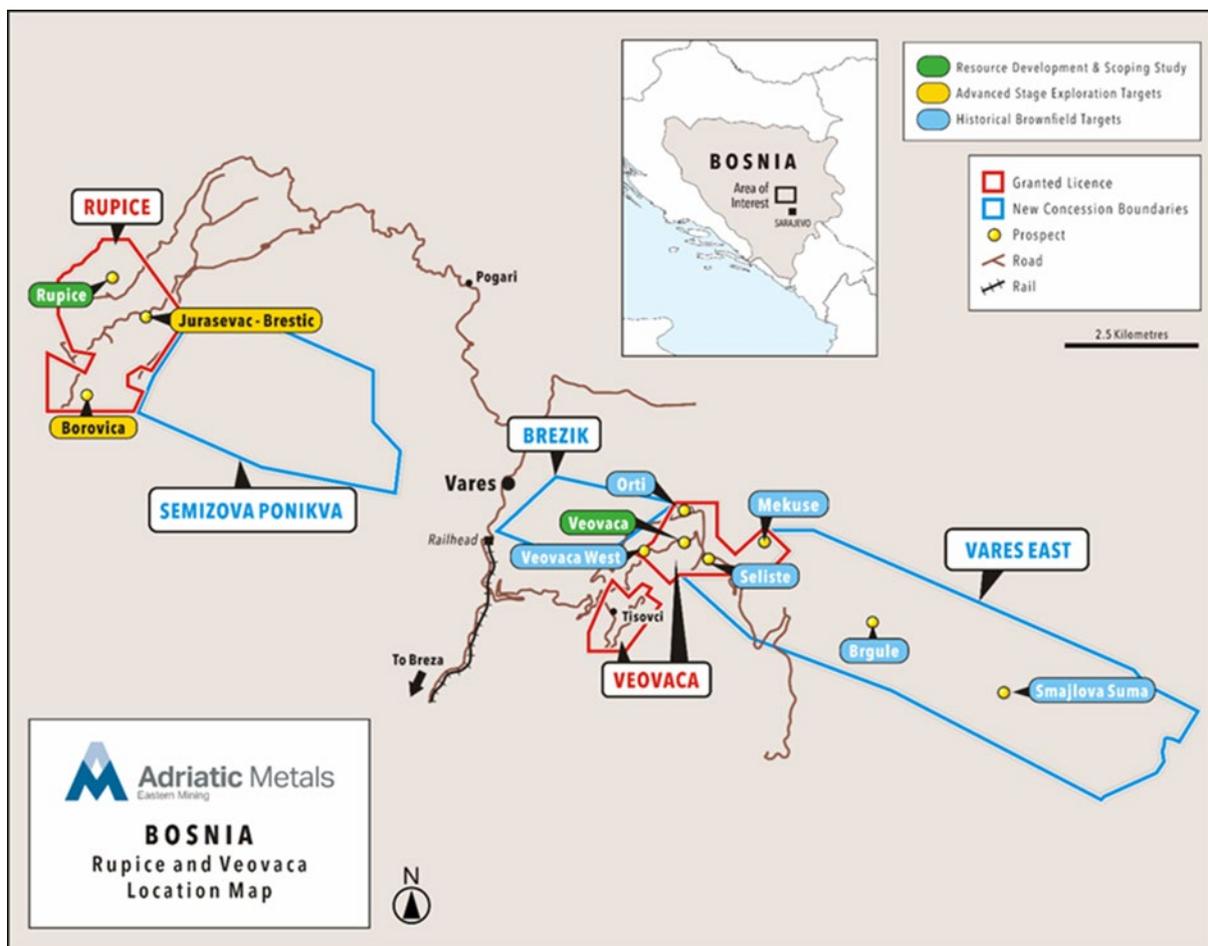


Figure 1.1. Map showing the location of the Vares Project

Eastern Mining recognizes the importance of cultural heritage for present and future generations as a source of valuable scientific and historical information, a tool for economic and social development and as an integral part of the cultural identity and practice of the population. Eastern Mining aims to ensure all of the above to protect cultural heritage throughout the Project. In addition, the company recognizes the importance of complying with national and international laws and regulations relating to cultural heritage.

This management plan applies to all employees and contractors as well as subcontractors working for Eastern Mining, as well as all activities related to the company that covers the concession area of the project that deals with specific issues related to cultural heritage sites and their management.

The purpose of the Cultural Heritage Management Plan is to identify and document cultural heritage sites within the concession area and to develop measures for the preservation and protection of cultural heritage within the concession area.

Eastern Mining intends to conduct all its practices in accordance with international best practices, respecting the principles and policies of the European Bank for Reconstruction and Development (EBRD) and the International Finance Corporation (IFC).

2.0 PURPOSE

The purpose of the Cultural Heritage Management Plan is to identify and document cultural heritage sites within the concession area and to develop measures for the preservation and protection of cultural heritage within the concession area.

This plan is intended to provide guidance and the necessary management tools and procedures to enable Eastern Mining and its contractors to meet these obligations.

The goals of the Cultural Heritage Management Plan are:

1. To protect both identified and unidentified cultural heritage from damage;
2. Appropriate management of cultural heritage, such as saving and preserving cultural heritage through efforts to ensure effective and open consultation with the local community;
3. Ensuring that local communities are informed about activities and responding quickly and efficiently to problems or complaints;
4. To provide an effective framework for monitoring, auditing and reporting to assess the effectiveness of implemented controls;
5. To define roles and responsibilities;
6. To list the required activities and measures for effective management of risks and impacts on cultural heritage;
7. Development of a mechanism for stakeholders related to cultural heritage and procedure of resolution, informing the local population about it;

The Cultural Heritage Management Plan considers Eastern Mining's general approach to cultural heritage management procedures and methodology.

The plan also covers the process of chance finds, which describes in detail the required steps to be taken if any of the cultural heritage is found during the construction and operation process.

With this document, Eastern Mining defines the required actions and measures for the overall management of cultural heritage for the sites of the site, Rupice and Veovaca.

3.0 ROLES AND RESPONSIBILITIES

ROLES	RESPONSIBILITIES	REPORT	FREQUENCY
Environmental and Social Management Manager	Monitoring the implementation of the Cultural Heritage Management Plan Performance monitoring and review Assist in investigation and coordination	General Manager, Board	Monthly / as needed
Environmental and Social Management Associate	Introducing workers to cultural heritage and sites, producing training materials Report on chance finds of cultural heritage sites Availability of procedures for dealing with chance finds of cultural heritage sites in the field Chance finds should be reported immediately and procedures followed Resolving grievances related to cultural heritage	Environmental and Social Management Manager	Monthly / as needed
Social Management Coordinator	Informing and involving the local community in the process of resolving complaints related to cultural heritage Participation in all meetings with the local community on cultural heritage Interaction with other cultural heritage stakeholders at Federal and International level	Environmental and Social Management Manager	As needed
Employees of Eastern Mining	Familiarization with cultural heritage and respect for all adopted procedures and procedures regarding the protection of cultural heritage Adherence to procedures for dealing with chance discovery of cultural heritage sites in the field	Indirect managers of the sector to which the employees belong - the manager	
Contractors	Adherence to and compliance with all procedures required by the Cultural Heritage Management Plan Special adherence to the procedure due to chance discovery of cultural heritage sites in the field	General Manager	

4.0 MANAGEMENT PLAN FOR SPECIFIC AREA

Management plan is based on guidelines of the European Bank for Recovery and Development (EBRD), World Bank and other prominent Finance Institutions (IFIs) such as the International Finance Corporation (IFC).

Eight designated cultural heritage assets of Medium Sensitivity are located within the municipality of Vares, but none of these sites is located in close proximity to the proposed project. The fortified medieval city of Bobovac is located approximately 6.5km from the Rupice mine and 4.8km from the haul route. There are no World Heritage Sites or receptors of High Sensitivity in the vicinity.

In addition to the eight designated sites, 20 archaeological sites are recorded in the Archaeological Lexicon of FBiH within the municipality of Vareš. These undesigned sites include the medieval cemeteries at Borovica Donja, located c. 500m from the proposed haul road, Brezik, located less than 1km from the proposed processing plant, and Visnjici, located c. 2km south of Veovaca open pit.

4.1. Management Plan Approach

The Project consists of the polymetallic underground Rupice mine, and the Vareš Processing Plant facility, as well as a 24.5km haul route connecting the two. The Vareš Processing Plant is located on brownfield land used for processing metals during the previous period of mining in the 1990s.

Desk based studies and fieldwork undertaken by the National Museum of BiH revealed that there are no known, or unknown previously unrecorded, significant sites within, or near, the proposed infrastructure for the Project. Therefore, “appropriate measures for minimising and mitigating adverse impacts on the cultural heritage”, as detailed in Paragraph 12 of EBRD PR.8, will not be required.

Appropriate mitigation measures will be included in the overall Environmental and Social Management System (ESMS) and described in the project-specific Environmental and Social Management Plan (ESMP), in accordance with EBRD PR. 8, Paragraph 12. The ESMP will prescribe that mitigation measures are overseen by trained and qualified personnel and detail methods to ensure that any third parties, such as contractors, working on the project are fully briefed, managed and monitored in accordance with PR. 8.

4.2. Implementation

Consultation with religious leaders in Gornja Borovica and the Borovica community leader determined that pilgrimage routes to a number of Roman Catholic monuments coincide with the proposed haul road. Consequently, the proposed route of the haul road was redesigned, to ensure continued access in accordance with Paragraph 13 of EBRD PR. 8.

When pilgrimage processions take place, mining and haul activities should be minimised where they could potentially impact on the cultural activities. Whilst these routes are not along the proposed haul route, it can be anticipated that the general area of Borovica would be significantly busier, thus extra care would be required. The same is true for the duration of the Borovica art colony, where Vares

would expect to see a significant increase in the number of visitors. Vehicular movements during this time should be carefully managed to avoid busy periods in Vares and Borovica.

Unexpected archaeological remains may be discovered during ground works and mineral exploitation. It is anticipated that the most likely finds will be related to historic mine workings in the region. In compliance with Paragraph 14 of EBRD PR. 8, the Client “will not disturb any chance finds until an assessment by a designated and qualified specialist is made and actions consistent with national legislation and this PR are identified”. A chance finds procedure and cultural heritage management plan, in accordance with EBRD PR 8, has been developed for the Project.

5.0 PROTECTION OF CULTURAL HERITAGE

5.1 Identification and mapping

During the ESIA, cultural heritage sites were identified in agreement with local communities and government authorities, and then described and mapped.

The map in Annex 2 of this document of Rupice (44 ° 11'59"N, 18 ° 13'41"E) and Veovaca (44 ° 08'29"N, 18 ° 20'57"E) provides an overview of the locations identified to date in the municipality of Vares. The footprint of the project is designed to avoid any places of importance for archaeological and cultural heritage. Mapping of cultural heritage sites will continue throughout the life cycle of the Project. Mapping is performed using standard GIS procedures, especially using the Gauss Kruger Zone 6 - EPSG: 3908 coordinate system.

Field research in the area of the municipalities of Vares was carried out before the works on field preparation and the beginning of ore exploitation within the plot of Rupice and Veovaca. Intensive reconnaissance was done on the plots that surround Rupice and Veovaca, as well as the areas through which it is planned to connect the mentioned plots. During the research, the expert team of the National Museum of BiH (composed of two archaeologists and a documentary filmmaker) inspected the terrain in detail, recorded all the archaeological potential of the area and collected data for making detailed maps in GIS according to given criteria.

According to the data recorded in the Archaeological Lexicon of BiH in the municipality of Vares until 1988, a total of 27 sites were registered, of which 4 are prehistoric, 1 ancient and 23 medieval. In the area of interest of this project, there are 3 recorded sites – necropoleis of headstone tombstones in Visnjici, Przici and Donja Borovica. A detailed overview of all medieval tombstones - headstones within the mentioned necropolis is given in Annex 1.

5.1.1. Necropolis in Visnjici

The medieval necropolis in Visnjici is located on a slightly elevated hill where Catholic cemetery was later formed (ca. 1905/1906). Therefore, this necropolis (grave burials and tombstones) were endangered. A common practice in such sites is the secondary use of tombstones as exteriors for new monuments, moving monuments to gain space, etc. The necropolis in Visnjici was recorded earlier in the literature by Sefik Beslagic¹, and later added to the list of archaeological sites in Bosnia and

¹ Beslagic, 1971.,151.

Herzegovina² According to that record, the necropolis in Visnjici had up to 25 headstone tombstones. The list that has been executed within the framework of reconnaissance and preventive archeological works, and for the needs of making a study of the impact on the environment and society, he gave somewhat different results. Today, the necropolis contains 18 tombstones visible on the surface of the earth, of which 6 gabled with a pedestal, and 12 tombstones in the shape of a slab. The orientation of the tombstones varies and N-S, E-W, NE-SW have been recorded. Only one tombstone is decorated with the motive of an anthropomorphic cross. The necropolis is about 2 km away from the existing Veovaca ore mine.

5.1.2. Necropolis in Brezik, Przici village

The Brezik necropolis in the village of Przici is located on a private plot. There is a Catholic cemetery in the immediate vicinity of the necropolis, so it can be assumed that the same fate befell this necropolis. Keeping records of S. Beslagic headstone tombstones of this necropolis were oriented in the W-E direction, which is not the same situation today. If we try to give a general description of this necropolis, we notice 8 tombstones located in two smaller groups next to each other, the distance between these two groups is about 5 m, and the orientation is N-S. Out of a total of 8 registered headstones, 4 are in the form of gables with a pedestal, 1 gabled tombstone, 1 slab and 1 headstone which cannot be determined. Of these, 3 tombstones are decorated with double spiral motifs, a cross and a rosette. All motives are located on the front or back front.

5.1.3. Necropolis in Donja Borovica

The headstone necropolis in Donja Borovica is located on a high hill where Catholic cemetery was later formed. Judging by the previous two necropolises, but also the situation that was found in this locality, it can be assumed that the same type of destruction happened to this necropolis. Only four tombstones were recorded, of which three gabled and one headstone which shape could not be determined. All tombstones are oriented in the NE-SW direction. They are carved from two types of stone: tufa and monolithic stone. Decorations were observed in one gable in the form of a braid at the edges and in the middle of the ridge. A wooden cross was placed on one of the gables, which was additionally concreted. According to the locals, this necropolis was much larger and stretched towards the gentle slope of this hill, ie in the direction of SW. Allegedly, human skeletons were found during the construction of the house, which is now abandoned and demolished.

6.0 CHANCE FINDS PROCEDURE

A chance Finds procedure has been developed. This applies to all Eastern Mining employees, visitors, contractors and subcontractors. This procedure describes the steps to be taken in the event of accidental discovery of a cultural heritage site during the undertaking of Eastern Mining activities. A Chance Finds procedure is a project-specific procedure that describes the actions that the company needs in case cultural heritage resources, especially archaeological resources, are encountered during the construction or operation of the project which are previously unknown. The procedure, as described in the IFC Performance Standard 8 and the EBRD Performance Requirement 8, is a

² AL BiH, 1988., regija 14.

procedure that prevents accidental findings from being interfered with until an assessment by a competent professional is performed and actions are performed in accordance with the requirements.

If any person discovers a physical cultural resource, such as (but not limited to) archaeological sites, historical sites, remains and objects, or a cemetery and / or individual tombs during excavation or construction, they should take the following steps:

1. Stop all work near the site until solutions are found to preserve these artifacts or obtain some advice from the relevant authorities;
2. Immediately inform the environmental and social manager who will inform the competent institutions;
3. Make an Incident Report and photograph the worksite;
4. Demarcate the discovered place or area; secure the worksite to prevent any damage or loss of portable items;
5. Decisions on the manner of handling the site shall be made by the competent institutions. This may include changes in appearance (for example, when immovable remains of cultural or archaeological significance are found) conservation, preservation, restoration and rescue; and
6. Work may be resumed only after the issuance of approval or a permit by the competent institutions.

One of the main requirements of the procedure is reporting. All sites must be registered. A photo log, copies of communications with decision-making authorities, conclusions and recommendations / guidelines, implementation reports may all be necessary, depending on the archaeological or cultural heritage significance of the find.

6.1 Training and awareness raising

All Eastern Mining employees, especially those whose job description includes fieldwork, will be instructed to identify potential cultural heritage sites and implement relevant actions regarding this process during their introduction to the project and regular refresher training. Cultural heritage management tools will be discussed for employees and subcontractors. Training materials will be developed by the Environment and Social team.

Cultural heritage awareness will be carried out in local communities. This will include:

- Raising awareness of the cultural heritage importance;
- Company procedures education; and
- Participation of company employees in actions that include cleaning and maintenance of sites where there are elements of cultural heritage.

7.0 KEY STAKEHOLDERS AND CONTACTS

Eastern Mining d.o.o.	<p>Damir Zukic- Environmental and Social Management Associate</p> <p>Contact information:</p> <p>+387 61 023 122</p> <p>damir.zukic@adriaticmetals.com</p>
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8.0 GRIEVANCE MECHANISM

Eastern Mining has developed and implemented a grievance mechanism in accordance with international good practice and which also fulfils the requirements of the EBRD Performance Requirement PR8. The mechanism is culturally appropriate and accessible to the population of the cultural heritage area located near the concession area.

Key requirements of PR8:

- Identify and assess risks and potential impacts on cultural heritage within the Project area during the design, construction, operation and decommissioning of the Project and establish preventive measures and plans to address them in a proportionate manner to the identified risks and impacts. These measures will favor the prevention or avoidance of risks and impacts due to minimization and reduction;
- Where a project or project phase presents material risks or potential negative impacts on cultural heritage, disclose relevant project-related information on how to join communities and relevant government agencies enabled to understand these risks and potential impacts, as well as proposed prevention, mitigation measures, as needed; and
- Development and application of a random find procedure, establishment of the necessary steps and a management system to be applied in case of an archaeological find.

An integrated approach to cultural heritage management involves a range of stakeholders, including the company, suppliers (and subcontractors), local authorities, relevant institutions, the museum and the general public. Effective cultural heritage management therefore requires robust processes regarding information dissemination, training, accountability, management actions, monitoring, control and corrective actions.

The grievance mechanism allows community members or other stakeholders to record problems, either real or perceived, with a view to addressing the challenges before they escalate. This helps build support and relationships based on communication, respect and trust between companies and local communities. To date, no grievances have been recorded relating to cultural heritage.

8.1 Grievance mechanism process

1. COMPLAINT RECEIVED - this needs to be entered in the complaint diary or stakeholder engagement database;
2. PROBLEM ASSESSMENT - forward the complaint to the responsible person in the company and the classification is in the category of cultural heritage;
3. ANSWER - send to the complainant, use his complaint and provide information on future steps and timeframe for resolution;
4. VERIFICATION AND SOLUTION - identify the root causes and develop actions to prevent similar incidents that occur in the future;
5. CONCLUSION - the manager of environment and social management must follow the investigation procedure to prevent a recurrence of the complaint;
6. FURTHER MEASURES - If the complainant is not satisfied, further investigation should be launched. The complaint may need to be forwarded to a third party for mediation.
7. CONTINUOUS MONITORING AND EVALUATION

8.2 Key objectives of the grievance mechanism process

- Ensure that the grievance mechanism is accessible to all;
- Provide different ways of filing complaints that suit the local culture;
- Carefully record and document complaints;
- Define a clear procedure for resolving the complaint - update the data regularly;
- Involve communities and third parties;
- Seek a solution through dialogue and joint problem solving with communities; and
- Establish a forum to deepen trust and communication.

9.0 COMPLAINT FORM

If you want your complaint to be anonymous, please leave the fields marked with an asterisk empty.

*

*

*

*

*

DETAILS OF COMPLAINT / INCIDENT

If insufficient space please write on separate sheet, sign, date and attach to this form.

10.0 NOTES

Locations and details of cultural heritage sites will be archived in a database to facilitate mapping and updating of cultural heritage sites in case of need. Complaints related to cultural heritage will be recorded as part of the Eastern Mining Complaints Mechanism.

Random finds will be reported in weekly and monthly reports, and the report will be submitted by the Environmental and Social Management Associate and the Environmental and Social Management Manager.

Meetings held on cultural heritage issues in local communities will be recorded as an example of standard procedures that are presented in the Stakeholder Engagement Plan.

11.0 LITERATURE

References:

1. Rupice and Veovaca, municipality of Vares, Bosnia and Herzegovina – Environmental Assessment: Archeology, November 2020
2. Archeological lexicon of Bosnia and Herzegovina, Tome 1, 1988, Sarajevo
3. Archeological lexicon of Bosnia and Herzegovina, Tome 3, 1988, Sarajevo
4. EBRD Performance Requirement 8
5. IFC Performance Standard 8
6. Vares Project ESIA – Archaeology and Cultural Heritage

ANNEX 1

Detailed information on all tombstones of the Brezik, Donja Borovica and Visnjici necropolis

Annex 1. Detailed information on all tombstones of the Brezik, Donja Borovica and Visnjici necropolises

Headstone data	Photo
<p>1. Location: Brezik Type: gable with pedestal Coordinates: X 6528494 Y 4889302</p>	
<p>2. Location: Brezik Type: gable with pedestal Coordinates: X 6528494 Y4889302</p>	

3.

Location: Brezik

Type: gable with pedestal

Coordinates:

X 6528494 Y4889300



4.

Location: Brezik

Type: gable with pedestal

Coordinates:

X 6528494 Y4889298



5.

Location: Brezik

Type: gable ?

Coordinates:

X 6528492 Y 4889288



<p>6. Location: Brezik Type: - Coordinates: X 6528494 Y 4889289</p>	
<p>Headstone data</p>	<p>Photo</p>
<p>1. Location: Donja Borovica Type: gable Coordinates: X 6519668 Y 4892684</p>	
<p>2. Location: Donja Borovica Type: panel Coordinates: X 6519659 Y4892690</p>	

<p>3. Location: Donja Borovica Type: gable Coordinates: X 6519657 Y 4892687</p>	
<p>4. Location: Donja Borovica Type: gable Coordinates: X 6519650 Y 4892683</p>	
<p>Headstone data</p>	<p>Photo</p>

1.

Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529834 Y 4888380



2.

Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529840 Y 4888379



3.

Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529840 Y 4888379



4.

Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529842 Y 4888380



5.

Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529842 Y 4888383



6.

Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529843 Y 4888401



<p>7.</p> <p>Location: Visnjici</p> <p>Type: gable with pedestal</p> <p>Coordinates:</p> <p>X 6529844 Y 4888362</p>	
<p>8.</p> <p>Location: Visnjici</p> <p>Type: gable with pedestal</p> <p>Coordinates:</p> <p>X 6529844 Y 4888362</p>	
<p>9.</p> <p>Location: Visnjici</p> <p>Type: gable with pedestal</p> <p>Coordinates:</p> <p>X 6529844 Y 4888380</p>	

10.

Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529844 Y 4888399



Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529845 Y 4888362



Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529846 Y 4888388



<p>13.</p> <p>Location: Visnjici</p> <p>Type: gable with pedestal</p> <p>Coordinates:</p> <p>X 6529846 Y 4888396</p>	
<p>14.</p> <p>Location: Visnjici</p> <p>Type: gable with pedestal</p> <p>Coordinates:</p> <p>X 6529847 Y 4888394</p>	
<p>15.</p> <p>Location: Visnjici</p> <p>Type: gable with pedestal</p> <p>Coordinates:</p> <p>X 6529847 Y 4888402</p>	
<p>16.</p> <p>Location: Visnjici</p> <p>Type: gable with pedestal</p> <p>Coordinates:</p> <p>X 6529848 Y 4888395</p>	

17.

Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6529849 Y 4888395



18.

Location: Visnjici

Type: gable with pedestal

Coordinates:

X 6528494 Y 4889302



ANNEX 2

Position of the registered necropolises of Donja Borovica. Brezik, Visnjici as well as the trial trenches and probes

Annex 2. Postion of the registered necropolises of Donja Borovica, Brezik, Visnjici as well as the trial trenches and probes

