



SOCIAL IMPACT MANAGEMENT PLAN

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1. PURPOSE

This Social Impact Management Plan (SIMP) presents the structure whereby ABM monitors its impacts on key stakeholders as a result of mining at the Twin Bonanza (Old Pirate High-Grade Gold) Project.

The key stakeholders include:

1. the Traditional Owners of the region surrounding of the project
2. governments, people and businesses of the Northern Territory and Australia as a whole.

All senior personnel and board of ABM are to receive a copy of this plan and to implement the content. From time to time this plan will be reviewed, updated and distributed.

1.1 Introduction

As part of the Environmental Impact Statement (EIS) for the Project, ABM will undertake a social impact assessment (Refer to Chapter 13 of ABM's EIS). The social impact assessment will aid in identifying social benefits and impacts and their significance arising from the Project's activities. Impact identification, stakeholder engagement and expert advice will be used to assist in developing the mitigation strategies. The purpose of the SIMP is to:

- describe ABM's impact management activities and commitments to minimise negative social impacts and enhance identified benefits to communities and other stakeholders
- describe the mechanisms to monitor these impacts and adjust mitigation strategies and action plans
- identify and establish stakeholder partnerships to develop and implement the mitigation strategies throughout the life of the Project
- determine a timeframe for the development and implementation of the management strategies
- provide guidance to ABM's future social performance activities.

2. METHODOLOGY - STAKEHOLDER ENGAGEMENT STRATEGIES

2.1 Engagement with Traditional Owners

Formal engagement

The Project is located on the Mt Frederick No. 2 Aboriginal Land Trust land area and the owners of the land are the trustees (Traditional Owners).

Formal engagement with the Traditional Owners occurs through consultation with the Central Land Council (CLC) as per the Aboriginal Land Rights Act (1976).

The Mining Agreement with the Traditional Owners outlines set protocols for formal engagement.

ABM will:

1. host an on-country meeting with the Traditional Owners and the CLC at least once a year for which the expenses will be covered by ABM

2. not block access at any-time (other than for reasons of immediate safety) for Traditional Owners who wish to visit the land and the Project
3. accept all requests for meetings
4. hold regular liaison committee meetings
5. ensure one company director, along with representation from senior management, is present at all pre-arranged meetings and are the representatives of the Company
6. ensure all company representatives adhere to the structure, customs and values of the meetings.

Furthermore, the ABM senior management will maintain regular contact with the CLC mining and legal teams. This includes prompt response to any queries whether formal or informal.

ABM Resources commits to a close working relationship with Traditional Owners and the CLC. This relationship will be one of honesty and integrity, mutual understanding, and recognition of the culture and values of the Traditional Owners.

Informal engagement

From time to time ABM personnel and contractors will have contact with the Traditional Owners including those who are colleagues (employees) and visitors.

All permanent personnel who work on the project must attend cultural awareness training as organised by ABM. All contractors and non-personnel are to be made aware of the ABM's policies. Management provides regular updates to existing personnel and new employees are advised of ABM's position on Traditional Owners when completing their induction. ABM ensures all employees understand that:

1. the Project is on Aboriginal land
2. Traditional Owners are to be treated with respect and with understanding that their culture may be different to their own
3. the Company will not tolerate any action or comment which may cause offence or is judged as acts of racism and prejudice in any form. If an employee witnesses an act of racism or prejudice then they must report it as soon as practicable to their manager
4. in certain cases racism is a criminal offence under the Racial Discrimination Act (1995) and the Company will report potential offences to the relevant authorities for investigation. The Racial Discrimination Act makes it unlawful to insult, humiliate, offend or intimidate another person or group in public on the basis of their race. Specifically, the Act states:

*It is unlawful for a person to do an act if:
 (a) the act is reasonably likely in all the circumstances to offend, insult, humiliate or intimidate another person or group of people, and
 (b) the act is done because of the race, colour or national or ethnic origin of the other person or some or all of the people in the group.*

2.2 Engagement with governments, people and businesses of the Northern Territory and Australia as a whole

Engagement with the Northern Territory Government

As well as the compulsory reporting required, ABM commits to regular reporting on issues of environment, planning, mining status and intentions of the Company (providing that reporting is not in breach of ASX disclosure rules).

Senior representatives of the Company must regularly communicate and engage in dialogue with representatives of the government.

Engagement with the people, businesses and Northern Territory as a whole

There are no formal rules relating to dealing with the general public. All employees are to be made aware that while working for ABM they must acknowledge and respect members of the public and act in professional and courteous manner.

3. MANAGEMENT AND MITIGATION

This section focuses on the prioritisation of economic and social impacts on both Indigenous Australians and on non-Indigenous Australians, the people, businesses and Northern Territory as a whole.

3.1 Management of economic and social impact assessment on Traditional Owners.

Appointment of an Indigenous liaison officer

The Company will appoint an Indigenous / Traditional Owner liaison officer (who may be an Indigenous employee) who will report directly to the managing director and company secretary and while on site will report to the site manager. The role of the Indigenous liaison officer is to:

1. oversee interaction, schedule meetings and coordinate visits of Traditional Owners
2. be a primary contact for Traditional Owners and the Company
3. assist with Indigenous employment and training programs
4. coordinate cultural awareness training for employees
5. monitor social impact of the Company's mining activities.

The CLC and Traditional Owners are to be notified of the contact details of the Indigenous / Traditional Owner liaison officer.

Payments to Traditional Owners via the CLC

ABM will adhere to agreements with the Traditional Owners and the Central Land Council. A register of scheduled payment dates is to be kept and the senior management is to ensure that all commitments are met.

Voluntary financial contributions made by the Company

The Company will establish a committee to respond to individual or group requests for financial support. Subject to available funds, the Company proposes \$100,000 per annum be made available. This may be used for a request from a local school, health clinic, sporting group, or cultural group. The committee will:

1. assess each request on its merits
2. contact the CLC to see if the request is appropriate and to understand if responding to the request or providing a payment will not have any adverse flow-on effects
3. give priority to requests which involves education, health, sporting and cultural activities
4. check the legitimacy of the request
5. make the process quick and streamlined and provide the funds readily.

Voluntary contributions including requests for construction

From time to time local communities may request that ABM helps provide temporary use of equipment for items such as earthworks, road or track construction / grading, or water bores. If such a request is made to project management they must contact senior management as soon as possible. If ABM is able, at relatively minimal costs, to help with the request ABM will do so ensuring that:

1. the request is legitimate and made directly by someone who is authorised to do so

2. the CLC is notified of the request and able to comment
3. all relevant permits are in-place.

Disturbance of habitat in traditional hunting and bush food gathering areas

ABM acknowledges that by virtue of the nature of mining that it will disturb areas that may be used for traditional hunting and bush food gathering. The disturbance and impact of flora and fauna is covered in the Biodiversity Management Plan.

A Traditional Owner is not to be denied access to any part of the project area or surrounding lands for hunting or bush food gathering (except for reasons of mine-safety). ABM will endeavor to provide support, including maps and track use, to aid with this activity.

Disturbance of sacred sites

The location of exclusion zones (which may be sacred sites) are provided to ABM by the CLC on a confidential basis. They are not to appear on any maps or publications by ABM. ABM personnel are provided with the location on a *need to know* basis.

In order to prevent anyone from inadvertently entering a sacred site the following rules apply.

1. Mine site personnel are only allowed to use transport routes on the designated direct tracks without seeking permission:
 - a. Wilsons Camp to mining areas Old Pirate / Golden Hind
 - b. Wilsons Camp to Corsair Bore and other authorized bores
 - c. Wilsons Camp to Buccaneer
 - d. Wilsons Camp to Processing Plant
 - e. Wilsons Camp to Airstrip
 - f. Wilsons Camp to Tanami Road
2. Exploration personnel or other personnel (such as environmental monitoring) exploring the wider area must:
 - a. file a travel management plan with the site manager who will check against sacred site / exclusion zone locations and approve the plan
 - b. not deviate from the travel plan without authority.

In addition documented sacred sites close to personnel activity are clearly flagged and marked, to prevent inadvertent access and disturbance (with permission from the CLC).

Indigenous employment and training opportunities

As per agreements with the Traditional Owners, should there be roles that become available for which local people are suitable or may be trained for, ABM must seek to employ via the communities first.

As positions become available ABM will:

1. contact the CLC employment officer with a description of the position
2. place an advertisement on the notice board in Balgo
3. notify existing indigenous employees that a new role has become available.

Training opportunities

Skills based training is to be offered to Indigenous employees. In particular, there will be an emphasis on vocational training that is considered useful to the worker back in their own community. This includes but is not limited to:

1. heavy machinery operation
2. mechanical skills

3. construction
4. maintenance of pumps and water bores
5. maintenance of generators
6. first aid
7. environmental rehabilitation

Supporting Indigenous employees

Indigenous employees may endure pressures that are different to non-indigenous employees. Often their presence in the community is required on short notice. ABM will support employees who need to return to the community on short notice. The employee's overall position or status in ABM will not be affected if they are required to return to the community.

As with all employees, Indigenous employees are to be made aware of the Company's Employee Assistance Program (counselling service) and a telephone option is available.

Ad hoc support by virtue of our presence

ABM is, essentially with its mining village and infrastructure, building a new community in the Central Desert with the mine and logistics. This results in increased road traffic. Employees and site managers are encouraged to support the surrounding region by:

1. providing emergency medical attention (using our on-site paramedics) if requested
2. allowing access and coordinating medical air evacuation (from our airstrip)
3. assisting stranded vehicles by—
 - a. always carrying extra food and water when travelling on the Tanami Road
 - b. providing basic mechanical assistance (e.g. jump starting a stranded vehicle)
 - c. providing emergency communications (e.g. with satellite phones).

3.2 Management of economic and social impacts on non-Indigenous Australians, the people, businesses and Northern Territory as a whole

Impact on businesses with priority to do business in the Northern Territory

In many cases local or regional centres do not have businesses which can efficiently provide all the services and supplies which the Company requires. The Company will prioritise and select service providers on a best efforts basis, within the reasonable expectation of free-market principals / efficiency of service based on their locality and proximity to the project area. Given that the project is located in the Northern Territory, and notwithstanding the fact that Halls Creek (WA) is one of the closest regional centers the Company will apply the following order of priority:

1. businesses in local communities (Balgo, Lajamanu, Yuendumu, Billiluna and Ringer Soak (Kundat Djarau) etc.)
2. businesses in Alice Springs
3. businesses domiciled in other regional centres in the Northern Territory
4. businesses in Darwin
5. businesses in Northern Australia (e.g. Halls Creek, Fitzroy Crossing, Kununurra, Mt Isa, Broome etc.)
6. businesses in Australia

4. MONITORING OF SOCIO-ECONOMIC AND CULTURAL IMPACTS

4.1 Monitoring of socio-economic impacts

Monitoring of socio-economic and cultural impacts will be coordinated by the Indigenous / Traditional Owner liaison officer. The officer will report regularly to the ABM board. Monitoring is to include:

1. maintaining dialogue with the CLC and developing a register of concerns
2. reporting on any direct approaches or comments from Traditional Owners
3. performing analysis of retention rates and skills training register of Indigenous employees.

Due to the nature of agreements with Traditional Owners, and restrictions on direct negotiation, the Company will not monitor the use of proceeds of compulsory payments, royalties and rents. ABM respects the autonomy afforded to Traditional Owners and the CLC in this matter.

4.2 Outcome and threshold criteria / early warning of adverse social impacts or initiatives not working

Not all of the social impacts require management (Table 1).

Table 1. Key performance indicators of Social Impact Management Plan.

ISSUE	MECHANISM	EARLY SIGNS	WARNING	CORRECTIVE ACTION
Formal engagement with Traditional Owners	Via the CLC	No or few requests from the CLC for meetings		1. Consult with CLC.
Indigenous employment	Maintain register including: 1. number of employees 2. length of employment 3. retention rate 4. training provided 5. requests to return to community 6. feedback	Changes in: 1. employment levels 2. retention rate 3. willingness to undertake training 4. check if training is useful in communities as well as work 5. number of requests to return to community		1. Consultation 2. Increase variety of training available 3. Establish reasons for leaving / absenteeism and try to remedy
Voluntary financial contributions / fund to Indigenous communities	Committee to review requests and ensure prompt response.	Company receives few or no requests. Company turns down requests on grounds of concern of legitimacy or availability of Company funds		Discuss with CLC and Traditional Owners about programs available for funding Approach schools, sporting groups, cultural groups etc. with offers of sponsorship
Racism or prejudice	Company has a zero tolerance policy on racism	Increasing reports of inappropriate acts, familiarity or racism		1. Increase work-force education 2. Increase in cultural awareness training programs 3. Issue written warnings
Disturbance of habitat in traditional hunting / bush food gathering areas	Monitoring of environmental footprint as per Company's environmental management plans	Reports of reduction in species for hunting or certain bush foods hard to find		Assess impact and implement changes as per the plan. Consult with affected peoples to see if new areas can be offset programs can be implemented
Disturbance of sacred sites / exclusion zones	Monitor travel plan management and reporting, and CarCom technology	Inadvertent access to an exclusion zone or near miss		Full investigation into action. Consult with CLC about signage if required or re-affirm Company policy
Impact on businesses of geographical / regional priority service selection	Maintain register and audit of location of service supply Chart changes	National centres supply rates are high relative regional centres		Search for new businesses to supply and offer tender in local / regional centres

5. REPORTING

Complaints and enquiries for the calendar year will also be reported in the Mining Management Plan under the *Mining Management Act 2001* and with the CLC and Traditional Owners through on ground meetings, discussing the scope and project direction, and through technical reporting under the Mining Agreement with the CLC.

5.1 Record keeping

Details of all complaints and investigations will be kept to assist in monitoring compliance with this management plan.

5.1.1 Register of external communication

A register of all external communications relevant to mine's operations will be maintained in ABM'S Incident and Complaints Register. Community complaints and inquiries will be registered recording details such as the date, time, complainant/inquirer name and address, information about the complaint/inquiry, response and corrective actions.

6. REVISION AND AUDITING

6.1 Revision

It is important that ABM has mechanisms in place to update the SIMP, particularly recognising new and emerging issues and implementation into the plan. These mechanisms include:

1. reporting quarterly to the board on any issues of social impact
2. making all employees aware of the SIMP, and providing regular opportunity for feedback they be receiving in the wider community
3. (in the case of Indigenous Australians), have the Indigenous liaison officer reporting regularly to senior management.
4. annually conducting an economic and social impact assessment, similar to that presented in the EIS.
5. allowing open and honest dialogue with the CLC and Traditional Owners.

The SIMP will be updated at least annually to reflect any findings.

6.2 Audit

The objectives of an audit are to maintain compliance with the SIMP.

Internal Audits

Internal audits of the ABM SIMP will be conducted annually or as new circumstances arise with potential to impact stakeholders and the community.

External Audits

Independent audits of the SIMP shall be conducted as requested by Government regulators or CLC.

7. REFERENCES

7.1 Legislation

Environment Protection and Biodiversity Conservation Act 1999 (Cth)
Aboriginal Land Rights (Northern Territory) Act 1976 (Cth)
Environmental Assessment Act 1982 (NT)
Mining Management Act 2001 (NT)
Heritage Conservation Act 1991(NT)
Aboriginal Land Act 1980 (NT)
Northern Territory Aboriginal Sacred Sites Act 1989 (NT)
Work Health and Safety (National Uniform Legislation) Act (and related Regulations)2007 (NT)

7.2 Other documents

Australian Bureau of Statistics 2007, *Census QuickStats 2006: Alice Springs* (T) (Local Government Area). Available from:
<<http://www.censusdata.abs.gov.au/ABSNavigation/prenav/ProductSearch?&areacode=LGA70200&producttype=QuickStats&action=401>>. [14 January 2009].

Cummings Economics 2010, *Upgrading the Tanami Road, Economic Impact Study. Prepared for Shire of Halls Creeks: report to the Senate and Regional Affairs and Transport Legislation Committee, Department of Infrastructure, Australian Government.* Available from:
<<http://www.aph.gov.au>>. [14 August 2013].

McArthy, P 2013, *Why Feasibility Studies Fail. AusIMM Melbourne Branch Presentation.* Available from:
<http://www.ausimm.com.au/content/docs/branch/2013/melbourne_2013_02_presentation.pdf>. [14 August 2013].

McDermott, D 2011, *Beyond Humbug in Aboriginal Health. Poche Centre for Indigenous Health and Well Being, Flinders University.* Available from:
<<http://www.ruraldoc.com.au/assets/Conference-Presentations/Dennis-McDermott-Beyond-Humbug-in-Aboriginal-Health.pdf>>. [14 August 2013].

Wikipedia 2013. *Humbug definition.* Available from: <
[http://en.wikipedia.org/wiki/Humbug_\(Aboriginal\)](http://en.wikipedia.org/wiki/Humbug_(Aboriginal))>. [14 August 2013].

8. DOCUMENT CONTROL AND REVISION HISTORY

8.1 Document information

PROPERTY	VALUE
Approved by	Chief Operating Officer
Document Owner	Environmental Manager & Managing Director
Effective Date	11/10/2013
Keywords	

8.2 Revisions

VERSION	DATE REVIEWED	REVIEW	NATURE OF THE AMENDMENT
1	16/8/13	Darren Holden	Initial Issue
2	23/8/13	Jutta Zimmermann	Concurring Review
3			
4			

8.3 Read by

READ BY	SIGNATURE	DATE