

Environmental and Social Report 2017



E&S Management System

- Following the CDC E&S audit undertaken on the group in January 2017 Maris has contracted IBIS Consulting to support the developing of a Environmental and Social Management System (ESMS) that is aligned to IFC Performance Standards.
- The ESMS focuses on the Group as well as on the four high risk companies within the Mining and Agriculture & Forestry divisions and has been finalised in Q1 of 2018.
- A 2-day training session took place in the Maris Nairobi office in February 2018 during which two consultants of IBIS trained Maris Operations Director Andrew Fimister and Maris Group's E&S Officer Karijn de Bok on the workings and implementation of the ESMS.
- Onsite training on the will be organized together with IBIS Consulting for Karebe, Venice, ETC and Tatepa in April and May 2018. The aim of the training is to create a better understanding of an ESMS and the necessary cohesion of its different elements to support further implementation within the Maris companies.

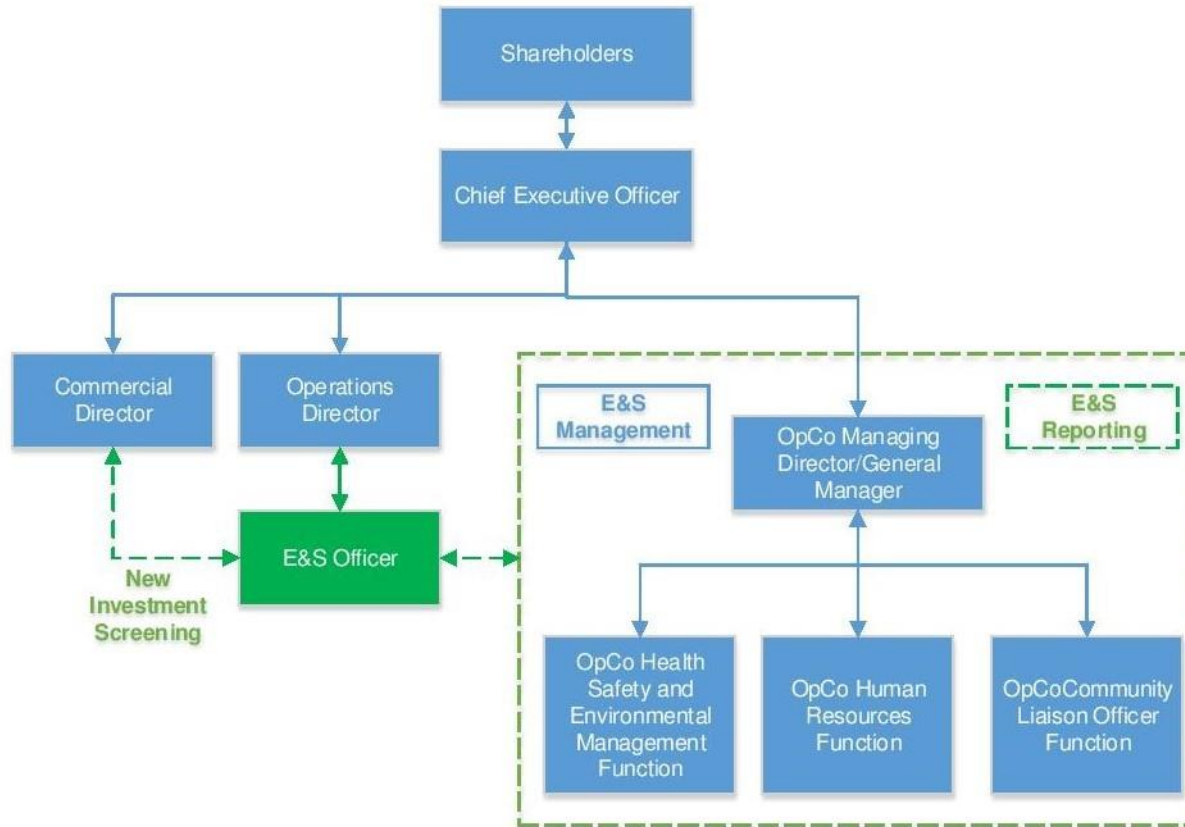
Impact

- In 2017 a total of 5.15 million man hours were worked by the Group.
- Undertaken by 2,359 employees of which 53% were permanent employees, 10% of the total were women and 6% expatriates.
- US\$ 3,725,671 of corporate taxes and royalties was paid to the governments of the countries in which we operate.
- US\$ 8,181,098 was paid in wages to our staff members.
- Total amount spent on CSR activities throughout the Group was US\$ 365,581 of which 70% was contributed by the Agriculture & Forestry Division, 29% by the Mining Division and 1% by the Property Services Division.

Capacity

- The Group's E&S Organizational Structure has been formalised in 2017 as per the Organogram on the next page.
- Karijn de Bok, the Group's HR Manager, was appointed as E&S officer in November to work with Maris Operations Director Andrew Fimister on the Group's E&S Management and Performance.
- In December 2017 she completed a 3-week online Environmental & Social Risk Analysis (ESRA) course organised by United Nations Environment Programme Finance Initiative (UNEP FI).
- The Group's E&S officer has started working full-time in the Maris Nairobi office as from 1st of January 2018.
- As part of her on the job training she has spent 4 weeks in the FMO office in The Hague to work with the E&S team within the Private Equity department.
- The high risk companies have reviewed their E&S capacity and where necessary recruited to cover the OHS, Security and Community Liaison functions.
- In March 2018 CDC hosted a E&S and BI Workshop in Nairobi. 6 colleagues of the Maris Nairobi office participated in different sessions.
- As part of Business Integrity and Governance capacity building within the Group different sessions on IFRS standards and Business Integrity practices have been organised together with KPMG. The following topics have been covered so far:
 - Accounting for foreign exchange translation (IAS 21)
 - Accounting for provisions and impairments (IAS 36 and IAS 39/IFRS 9)
 - Accounting for revenue (IAS 18 and IFRS 15)
 - Accounting for inventory including approaches to valuation (IAS 2 & IFRS 13)
 - Anti-Bribery Regulations

Maris Ltd E&S Organogram



Incidents and Non-Compliance Issues

- In 2017, a total of 61 incidents took place within the Group of which 21 incidents resulted in Lost Time Injuries (LTI's).
- The 2017 LTI frequency rate was 4.08 per million hours worked.
- 11 incidents were considered serious incidents and Serious Incident Reports (SIR) were filed.
- It is with great regret that we report that 2 serious incidents included 4 fatalities: 1 employee of ETC and 3 local contractors of ETC. It is the first time in the history of Maris that a fatal accident occurred. Both the Maris CEO and Operations Director were closely involved in the investigations of the two Serious Incidents at ETC. A visit to ETC took place the week after the second incident was reported, to investigate both accidents, visit the accident sites and interview people concerned, including local law enforcement. The ETC MD and the Maris CEO also had discussions with all ETC contractors and a separate meeting with the contractor responsible for the Road Traffic Accident. ETC has paid out full compensation to the deceased employee's family and compensation has been reclaimed from the insurance.

The following actions have been identified by Maris ExCo and ETC Management to be necessary to mitigate the risk of reoccurrences of such accidents:

- Recruitment of fulltime expatriate EHS Manager for ETC;
- Establishment of ETC Environmental Health and Safety Committee;
- Training of non-harvesting personnel in the hazards of harvesting and refresher training of harvesting teams. A Chainsaw Operator Training was undertaken in February 2018;
- Review of relevant operational procedures including but not limited to Danger Zone evacuation and management procedure, Bell Logger procedure, Tree-Felling procedures;
- Review and training of ETC staff and contractors on ETC Road Safety procedures and ZERO tolerance culture ;
- Review of general OHS procedures and safety culture within the company which includes signage, PPE, training and toolbox talks;
- Continuous inspection of vehicles being used within operations, including contractor vehicles; and
- Ongoing review of local medical capacity, including trauma & emergency response.

Company	Employees	Permanent employees	Women	Expats	Man hours	Serious Incidents	LTI's	corporate taxes and royalties (in US)	wages (in US)	CRS (in US)
ACACIA	49	35	25	30	101,920	0	0	\$8,281	\$132,029	\$0
AFRITISE	13	13	1	4	22,880	0	0	\$7,822	\$66,302	\$0
ALP	8	8	2	4	15,680			\$0	\$516,083	\$0
COMMONER	58	6	1	0	144,768	0	0	\$79,319	\$590,287	\$0
EQUATOR DRILLING	20	20	0	4	35,000	2	0	\$0	\$321,000	\$0
EQUATOR ENERGY	0	0	0	0	0	0	0	\$0	\$0	\$0
ETC	452	84	3	56	1,128,192	3	21	\$826,042	\$675,418	\$210,422
KGML	310	278	24	13	720,000	1	0	\$1,485,000	\$1,929,000	\$147,000
MMO	15	15	11	1	32,400	2	0	\$58,000	\$183,000	\$0
MTA	20	20	4	2	37,400	1	0	\$207,449	\$605,758	\$0
MTR	14	14	4	4	27,440	0	0	\$298,595	\$78,394	\$0
MITT	27	27	4	4	64,800	0	0	\$119,766	\$356,066	\$0
MULITANI	33	33	16	1	68,376	0	0	\$18,355	\$125,000	\$1,800
OSS	21	21	2	0	43,512	0	0	\$107,492	\$51,260	\$444
QSS	43	43	14	2	120,744	0	0	\$1,695	\$160,000	\$890
TATEPA	1,058	428	122	5	2,091,960	0	0	\$202,477	\$1,589,958	\$5,025
VENICE	218	199	7	2	496,704	2	0	\$305,376	\$1,985,256	\$0
Total	2,359	1,244	240	132	5,151,776	11	21	\$3,725,669	\$9,364,811	\$365,581



CSR ACTIVITIES

Serial	Company name	Country	Division	Approximate CSR spent US\$	Description of activity
1	ETC	South Sudan	Agriculture and Forestry	\$2,000	Funding for the building of a toilet block for the Gbudue State Football Association in Yambio
2	ETC	South Sudan	Agriculture and Forestry	\$20,000	Completion of Mbakpara Primary School in Mborizanga
3	ETC	South Sudan	Agriculture and Forestry	\$800	Sponsoring and facilitating the 1st ever Investment Forum Gbudue State bringing together all the stakeholders in the state
4	ETC	South Sudan	Agriculture and Forestry	\$500	Funding community based workshops under hummingbird for peace
5	ETC	South Sudan	Agriculture and Forestry	\$300	Contribute for general cleaning exercise at Yambio Town
6	ETC	South Sudan	Agriculture and Forestry	\$3,000	Donated timber, nails and provided labour for making school furniture for Zedera Primary School.
7	ETC	South Sudan	Agriculture and Forestry	\$4,000	Facilitated a team from Gbudue State to go to Congo to seek for permission to repair the road
8	ETC	South Sudan	Agriculture and Forestry	\$2,000	Provide timber to local churches, schools, and hospitals
9	ETC	South Sudan	Agriculture and Forestry	\$3,000	Donated 3 solar street lights to Nzara Town
10	ETC	South Sudan	Agriculture and Forestry	\$80,000	Through the funds to the County Government, a new hospital block has been constructed at St Theresa Hospital in Nzara
11	ETC	South Sudan	Agriculture and Forestry	\$2,000	Donation to Ministry of Interior to facilitate Bishop visit to Mborizanga E.T.C
12	ETC	South Sudan	Agriculture and Forestry	\$3,000	Donation of petrol to the SPLA to facilitate expedition to Maridi
13	ETC	South Sudan	Agriculture and Forestry	\$1,124	Donation to local football association to facilitate building of a toilet block
14	ETC	South Sudan	Agriculture and Forestry	\$2,500	Donation to Yambio Football Team to facilitate the transportation to Juba for a football match.
15	ETC	South Sudan	Agriculture and Forestry	\$5,100	Donation to the State towards transportation and purchasing for food for the state feeding program
16	ETC	South Sudan	Agriculture and Forestry	\$2,932	Diesel donated to various state departments to facilitate movements.
17	ETC	South Sudan	Agriculture and Forestry	\$500	Donations of timber and poles for Yambio prison
18	ETC	South Sudan	Agriculture and Forestry	\$1,000	Subsidised construction of the roof of an operating Theatre in Nzara hospital
19	ETC	South Sudan	Agriculture and Forestry	\$1,000	Digging of water trench connecting the Hospital and the sisters/Doctors residence
20	ETC	South Sudan	Agriculture and Forestry	\$580	Contribution to welcoming of the paramount chief back from Juba
21	ETC	South Sudan	Agriculture and Forestry	\$720	Donation to ECS church and Naimaku Parish in Nzara
22	ETC	South Sudan	Agriculture and Forestry	\$0	Support to Super Eagles football team in Yambio
23	ETC	South Sudan	Agriculture and Forestry	\$500	Food and other essentials provided to the County for Security patrols
24	ETC	South Sudan	Agriculture and Forestry	\$31,000	Payment to the County to Commence construction of community centre in Nzara, from Royalties payments
25	ETC	South Sudan	Agriculture and Forestry	\$42,866	SDF procurements of goods for Sasa Primary School Construction plus local materials procured

Serial	Company name	Country	Division	Approximate CSR spent US\$	Description of activity
26	Mulitani	Mozambique	Property Services	\$100	Unused land made available to employees and their family to plant vegetable for own use or reselling, training in sowing
27	Mulitani	Mozambique	Property Services	\$100	Two prizes given to Local School for best academic performance in class, prize is a fully paid computer course at the Tete
28	Mulitani	Mozambique	Property Services	\$0	Employees are assisted with flexible working hours in order to complete studies in their field of work to benefit both
29	Mulitani	Mozambique	Property Services	\$1,600	Repair and Maintenance of 3 km main access road to Mulitani and used by the whole community
30	OSS	Mozambique	Property Services	\$72	Growing vegetables on open land for employees and families, seed, tools and water supplied (Tete)
31	OSS	Mozambique	Property Services	\$0	Local Herdsmen invited to graze their cattle on OSS land.
32	OSS	Mozambique	Property Services	\$300	Local Football team received support, football gear sponsored. Maintenance of Football field.
33	OSS	Mozambique	Property Services	\$72	Growing vegetables on vacant land for employees and families, water supplied (Nacala)
34	QSS	Mozambique	Property Services	\$0	Planting trees around Kaia. No cost but environmental and health benefits anticipated.
35	QSS	Mozambique	Property Services	\$240	Support local community patrol with fuel monthly
36	QSS	Mozambique	Property Services	\$50	Support local HIV/AIDS charity
37	QSS	Mozambique	Property Services	\$100	Donated food to hospital inpatients at Christmas
38	QSS	Mozambique	Property Services	\$500	Repairing local village access road
39	TA TEPA	Tanzania	Agriculture and Forestry	\$1,181	WTC local roads repair and Maintenance
40	TA TEPA	Tanzania	Agriculture and Forestry	\$948	WTC provide TIPPER & manpower to District council for District general Cleanliness
41	TA TEPA	Tanzania	Agriculture and Forestry	\$29	WTC supports 40lts of Diesel to Police office for supporting District patrol during the Christmas & new year
42	TA TEPA	Tanzania	Agriculture and Forestry	\$134	WTC contributed to TACAIDS to support National HIV the funds.
46	TA TEPA	Tanzania	Agriculture and Forestry	\$134	Uhuru Tourn Rungwe - WTC contribute to District council for uhuru tourn race.
47	TA TEPA	Tanzania	Agriculture and Forestry	\$67	WTC contributed to TPAWU zone office for workers days
48	TA TEPA	Tanzania	Agriculture and Forestry	\$89	WTC contributed to Busokelo council development committee for Member of Parliament Hon. Mark Mwandosya farewell
49	TA TEPA	Tanzania	Agriculture and Forestry	\$447	WTC contributed to Rungwe District Council for the preparation of reception of Prime ministers Visit.
50	TA TEPA	Tanzania	Agriculture and Forestry	\$256	WTC to support District council for NISAN PATROL with drivers for supporting dissemination of STD VII National

CSR ACTIVITIES

Serial	Company name	Country	Division	Approximate CSR spent US\$	Description of activity
51	TATEPA	Tanzania	Agriculture and Forestry	\$134	Rungwe District Government Annual contribution for National Freedom Torch
52	TATEPA	Tanzania	Agriculture and Forestry	\$447	Rungwe contributed to Kyimo Ward Village Government Annual road maintainance (10+km) village road
53	TATEPA	Tanzania	Agriculture and Forestry	\$201	Rungwe supplied Ilenge Village Schools Constuction 30 Bags of cements for village secondary school construction
54	TATEPA	Tanzania	Agriculture and Forestry	\$112	Rungwe supplied Tukuyu District Prison 30 crates of avocado rejects to the inmates
55	TATEPA	Tanzania	Agriculture and Forestry	\$87	Rungwe supplied 27 crates of avocado rejects to primary school student for Ilenge Primary School
56	TATEPA	Tanzania	Agriculture and Forestry	\$0	Rungwe hosting students for Field Training Practicals more than 50 univesity students were hosted for 9 weeks practical
57	TATEPA	Tanzania	Agriculture and Forestry	\$22	Rungwe people with hearing defects to establish District Deaf Association so as they can advance their matters in proper
58	TATEPA	Tanzania	Agriculture and Forestry	\$45	Rungwe contributed to Regional Trade Union to strengthern their operations in the region
59	TATEPA	Tanzania	Agriculture and Forestry	\$178	Kyimbilia Tea Packing paid driving school fees for one senior staff
60	KAREBE	Kenya	Mining	\$5,000	Yearly Bursary sponsoring 100 students from the community 500k/year
61	KAREBE	Kenya	Mining	\$500	Yearly purchase of Football Boots and Uniforms - Kamuny Secondary FC School team
62	KAREBE	Kenya	Mining	\$2,000	Yearly purchase of Soccer Boots & Goal Nets - Chemase Sec School
63	KAREBE	Kenya	Mining	\$700	Yearly sponsoring of Tournament Fees
64	KAREBE	Kenya	Mining	\$300	Yearly Referee Fees for Sponsored Soccer Tournament
65	KAREBE	Kenya	Mining	\$4,000	Monthly purchase of Drugs/Medicine to Kibisem Community Clinic/Dispensary
66	KAREBE	Kenya	Mining	\$5,500	Bought water pipes for irrigation w hich had stalled for some time (Riang Intl)
67	KAREBE	Kenya	Mining	\$4,000	Built Toilets - Chief's Camp (Chemase AP Camp)
68	KAREBE	Kenya	Mining	\$4,000	Built Toilets - Community Clinic / Kibisem Dispensary
69	KAREBE	Kenya	Mining	\$50,000	Construction of new 5-room Police Station at Chepsw eta
70	KAREBE	Kenya	Mining		Purchase & construction of 5k Ltr water tank at Police Station Chepsw eta
71	KAREBE	Kenya	Mining	\$1,000	Laptop & Printer purchased for Police at Chepsw eta
72	KAREBE	Kenya	Mining	\$1,000	Construction of new PkiPki BodaBoda shade & seating stage
73	KAREBE	Kenya	Mining	\$8,000	Currently sinking water bore hole at Chepsw eta police station
74	KAREBE	Kenya	Mining	\$7,000	Completed the double irrigation pipe line from Arobo river from Chemesoi through Kibisem to Chepsw eta.
75	KAREBE	Kenya	Mining	\$4,000	Offering 3-4 month internships to 5 Mining Engineering students from Kenyan universities annually, including
76	KAREBE	Kenya	Mining	\$50,000	Construction and improvement of local road
Total:				\$365,581	



- Following the E&S Due Diligence report of 2017 Maris has worked on the development of an ESMS for the Group and for the four companies that are considered high risk. An overview of the progress has been included on the next page. As illustrated, the non existent elements have been turned into uncomplete or comprehensive.
- The prioritised list of action points has been executed to a great extent in the past year. A detailed status overview can be found at the end of this report.
- While progress has been made on the ESMS and Action Plan the risks and performance overview does still show significant and moderate issues. For 2018 the objective is to have moved at least 2 issues from significant to moderate.

Policies and Procedures	Maris Ltd	Mining	Agri & Forest	Property	Services
E&S, OHS, HR Policies	Uncomplete	Uncomplete	Comprehensive	Inexistent	Comprehensive
Risk Assessment	Uncomplete	Uncomplete	Uncomplete	Uncomplete	Uncomplete
Internal Resources	Inexistent	Uncomplete	Inexistent	Uncomplete	Comprehensive
Indicators & Targets	Inexistent	Uncomplete	Uncomplete	Uncomplete	Uncomplete
Monitoring & Reporting	Uncomplete	Uncomplete	Uncomplete	Inexistent	Comprehensive
Emergency Preparedness	Uncomplete	Uncomplete	Comprehensive	Uncomplete	Comprehensive
OHS	Inexistent	Inexistent	Uncomplete	Uncomplete	Comprehensive
Labour and Working Cond.	Uncomplete	Inexistent	Comprehensive	Uncomplete	Comprehensive
Environmental Damage	Inexistent	Inexistent	Uncomplete	Comprehensive	Uncomplete
Resource Management	Inexistent	Uncomplete	Comprehensive	Comprehensive	Comprehensive
Chemical Management	Inexistent	Uncomplete	Comprehensive	Comprehensive	N.A.
Biodiversity	Inexistent	Inexistent	Uncomplete	Uncomplete	N.A.
Community HS	Inexistent	Inexistent	Uncomplete	Uncomplete	N.A.
Supply Chain	Inexistent	Uncomplete	Comprehensive	Uncomplete	N.A.
Land acquisition	Inexistent	Inexistent	Comprehensive	Uncomplete	N.A.
Food Safety	N.A.	N.A.	Comprehensive	N.A.	N.A.

Color	Legend
Green	Comprehensive
Yellow	Uncomplete
Red	Inexistent
Grey	N.A.

Table 1: E&S MS Overview

Policies and Procedures	Maris Ltd	Mining	Agri & Forest	Property	Services
E&S, OHS, HR Policies	Comprehensive	Uncomplete	Comprehensive	Uncomplete	Comprehensive
Risk Assessment	Uncomplete	Uncomplete	Uncomplete	Uncomplete	Uncomplete
Internal Resources	Comprehensive	Comprehensive	Comprehensive	Uncomplete	Comprehensive
Indicators & Targets	Uncomplete	Uncomplete	Uncomplete	Uncomplete	Uncomplete
Monitoring & Reporting	Uncomplete	Uncomplete	Uncomplete	Uncomplete	Comprehensive
Emergency Preparedness	Uncomplete	Uncomplete	Comprehensive	Uncomplete	Comprehensive
OHS	Uncomplete	Uncomplete	Uncomplete	Uncomplete	Comprehensive
Labour and Working Cond.	Uncomplete	Uncomplete	Comprehensive	Uncomplete	Comprehensive
Environmental Damage	Uncomplete	Uncomplete	Uncomplete	Comprehensive	Uncomplete
Resource Management	Uncomplete	Uncomplete	Comprehensive	Comprehensive	Comprehensive
Chemical Management	Uncomplete	Uncomplete	Comprehensive	Comprehensive	N.A.
Biodiversity	Uncomplete	Uncomplete	Uncomplete	Uncomplete	N.A.
Community HS	Uncomplete	Uncomplete	Uncomplete	Uncomplete	N.A.
Supply Chain	Uncomplete	Uncomplete	Comprehensive	Uncomplete	N.A.
Land acquisition	Uncomplete	Uncomplete	Comprehensive	Uncomplete	N.A.
Food Safety	N.A.	N.A.	Comprehensive	N.A.	N.A.

Colour	Legend
Green	Comprehensive
Yellow	Uncomplete
Red	Inexistent
Grey	N.A.

Table 1: E&S MS Overview

Ser	Action Point	Status
1	The 'Easy Wins': Any outstanding OHS gaps identified by the CDC audit to be addressed, as well as any further ones identified in the process. To include: signage, safety equipment, PPE, machine guarding, material data safety sheets, eye washes, emergency ablutions, fire safety, hazmat protocols etc	Many of these OHS gaps identified during the audit have now been addressed.
2	Review all company Emergency Response Plans (ERPs) and the holdco Serious Incident Management Plan (SIMP). It was noted that certain emergency scenarios were not included or planned for within the HIGH RISK portfolio, such as tailings dam breach or hazardous material spill. This is to be rectified. ERP's are to be reviewed and rehearsed regularly.	Emergency Planning and Response Standard has been put in place, including the minimum requirement to review ERPs annually. ERPs for each company will be reviewed against the Standard. Reviewed Serious Incident Reporting Guidelines and reporting format have been implemented for each company.
3	In tandem with the above, review company first aid capability. HIGH RISK companies are to ensure that adequate first aid resources are in place, including first aid trained staff, appropriate equipment and protocols, so that any unforeseen casualties can be treated effectively before evacuation.	Significant progress has been made in ensuring that all HIGH RISK companies have adequate first aid resources in place. The task is ongoing.
4	HIGH RISK companies to review their E&S staff complement and to ensure adequate HR (both temporary and permanent) is in place, such as Safety Officer, Community Liaison Officer, Security Officer etc. At the same time an E & S organisation chart is to be created with roles & responsibilities to be defined.	Maris Group HR Manager Karijn de Bok has been appointed as Group E&S Officer. She moved to Nairobi in February 2018 after working 4 weeks at the FMO office in The Hague. Within the HIGH RISK companies different positions are now being covered: OHS, CLO/MRO. Security. The E&S Org Chart can be found on page 15.
5	Create risk registers that define hazards, risks and impacts within each business. Maris Holdco already does this, but companies need to follow.	Risk Management Standard (including Risk Register) has been developed. Priority will be given to implement the Standard and populate the Risk Registers in the HIGH RISK companies. This is a priority for 2018.

Ser	Action Point	Status
6	Risk assessment process to be formalised, and risk assessments to be undertaken on activities within the business with inherent hazards and risk, in order to manage and mitigate said risk of harm occurring.	The above Risk Management Standard formalizes the procedure to identify, assess and mitigate risks.
7	Environmental and Social (E&S) policies to be reviewed and gaps to be filled. Policies as a minimum should include: Environmental, OHS, Corporate Social Responsibility, Community Health and Safety, Communicable Diseases (including HIV), Bribery & Corruption and HR. Policies are to be signed by senior management.	All policies have now been written, as part of the Group's ESMS development. Implementation has started and will continue in 2018.
8	Define and record operational procedures. This represents the most burdensome task in terms of paperwork within the overall ESMS. There should be defined operational procedures (aka SOPs) for any activities carried out in the running of the business that carry inherent E&S risk, for example chain-saw usage, explosives usage etc. The perfect scenario will see every work process within the business with inherent risk of harm, having an equivalent written down procedure.	The ESMS includes procedures (SOP) for the most common as well as hazardous activities. Included for example are: Machine Safety, Underground Works, Hot Works, Explosives and Blasting, and Road Safety. Implementation of these SOPs is underway and will continue through 2018.
9	Formalise and record safety meetings: there is a requirement to formalise safety meetings, the regularity with which they are held, and to log their occurrence and attendance. While the group do undertake regular ad-hoc safety sessions, a more systematic process is required. This will further encourage the development of a safety-led culture.	This has been initiated with a number of safety meetings having taken place across HIGH RISK companies.
10	Formalized training programs: to formalize training programs within the business , to record the occurrence of all training courses and to log all staff members that have undergone such, ideally producing certificates for successful completion. To include tool box talks prior to the working day.	Competency, training and awareness standard has been developed to help creating formalized training programs. Daily toolbox talks are being held at the Mines and ETC has started organizing regular training sessions on specific topics (for example Chain Saw training) for employees and contractors.

Ser	Action Point	Status
11	<p>In addition to the company’s environmental policy, a more detailed and systematic plan for management of the environment should be formulated, which should include a waste management plan (both hazardous and non-hazardous), end-of-mine-life restitution activities & budget and all of the procedural practices and documentation (as per point 8) for activities with inherent risk of environmental harm.</p>	<p>Environmental management procedures have been developed for the Group and its HIGH RISK companies including: Waste Management, Waste Water Management, Soil and Biodiversity Management and Environmental Monitoring Plan. Implementation yet to take place.</p>
12	<p>Environmental impact surveys/assessments: to ensure that any new projects undergo a thorough process of EIA in order to understand completely the environmental impact of such. This process should be in line with IFC performance standards 1 through to 8.</p>	<p>New Investment E&S Screening Procedure has been implemented to screen for potential E&S risks prior to deal finalisation. This applies to new investments Maris is considering as well as to an OpCo considering a new investment or expansion</p>
13	<p>In addition to the company’s corporate social responsibility policy, a CSR Plan should be formulated/formalised with all subsequent CSR activities transparently controlled and reported. Currently within the group, there is some good CSR work being undertaken, but there is no clear and systematic plan or strategy for such, against which performance can be measured.</p>	<p>Yet to be developed.</p>
14	<p>Stakeholder engagement and resettlement plan: specifically for the group’s mining division with regards to the management of artisanal miners currently residing on Venice Mine ‘tributes’ or concessions granted by the previous owner. To formulate a plan on how to manage the tributees most of who are residing illegally, and to execute said plan in adherence to IFC Performance Standards.</p>	<p>Stakeholder Engagement Procedure developed which applies to the Mining and Agriculture & Forestry division. Venice is seeking a solution with regards to the illegal artisanal miners. Illegal artisanal mining is a country wide problem and Venice is therefore actively engaging with the government to address this. Venice is also looking into the option of engaging the artisanal miners by opening a stamp mill where they can process the ore after which Venice can buy this.</p>

Ser	Action Point	Status
15	<p>To ensure that community health and safety policy, procedures and resources are adequate: specifically for the outgrower programs run by Wakulima Tea Company, part of Tatepa. To ensure that outgrowers are protected by sound policies and procedures in line with IFC Performance Standard 2 Labour and Working Conditions. To also ensure that communities living within or close by to company operations are protected by sound policies and procedures in line with IFC performance standards. This will require a Community Health and Safety policy, a clear assignment of responsibility for Community Health and Safety to a company resource and various procedural documents to manage the subject sufficiently.</p>	<p>Community Health and Safety Procedure developed for the HIGH RISK companies. Onsite ESMS training at Tatepa in collaboration with IBIS scheduled for April 2018 after which policies and procedures will be further implemented.</p>
16	<p>Labour and working conditions in accordance with IFC Performance Standard 2 and International Labour Organisation principles. Although the group generally operates in accordance with such, the standards set out in IFC and ILO conventions and principles should be fully enshrined in the group's policy documents (specifically the HR policy) and within everyday operational procedures.</p>	<p>HR Policy, Operational Procedures and Grievance mechanism in place in accordance with IFC requirements. Contractor Management Procedure to be reviewed to engage Contractor and Third Party workers.</p>
17	<p>Grievance reporting mechanisms: to put in place a defined procedure for the airing of grievances from the various stakeholders of the group's businesses, both internal and external. Although such ad-hoc processes exist within the group currently, there is no formalised system.</p>	<p>Grievance Management Procedure has been developed and includes both Internal and External Grievances. Implementation on OpCo level is in process. A grievance report form has been included on the Maris website to cater to those stakeholders that prefer to submit their grievance anonymously.</p>

Ser	Action Point	Status
18	To put in place a system of E&S monitoring and evaluation: to be achieved through the development of a policy and procedures for such and the assignment of monitoring & evaluation to specific management personnel or third party consultants on an annual or bi-annual basis.	Monitoring, Reporting and Compliance Assurance Standard included in the ESMS and to be implemented for all Opcos. Opcos to report quarterly to Maris E&S Officer, Maris to produce annual E&S report for its shareholders.
19	E&S Reporting: currently there exists a fairly well developed system of incident reporting within the group, with all serious incidents and accidents reported upwards and submitted to the audit committee and the board of the holdco. Beyond this, there needs to be an improvement in the reporting of general E&S matters and data. This is currently in hand with some measure of E&S data being added to the monthly operational reports of companies, and companies within the HIGH RISK divisions being expected to submit an annual report.	The Monitoring, Reporting and Compliance Assurance Standard (point 18) includes a reporting requirement. Opcos are to report E&S data on a quarterly basis. Data collection tool to be extended over time with more variables.

E&S RISKS AND PERFORMANCE OVERVIEW 2016 and 2017



Risks & Performane	Mining	Agri & Forest	Property	Services
OHS	Yellow	Red	Green	Green
Labour and Working Cond.	Yellow	Red	Green	Green
Damage to Environment	Yellow	Yellow	Green	Yellow
Resource Management	Yellow	Yellow	Green	Green
Chemical Management	Yellow	Yellow	Green	Grey
Biodiversity	Yellow	Yellow	Yellow	Grey
Community HS	Red	Yellow	Yellow	Grey
Supply Chain	Yellow	Yellow	Green	Grey
Land acquisition	Red	Red	Yellow	Grey
Food Safety	Grey	Green	Grey	Grey

Colour	Legend
Green	Minor issues
Yellow	Moderate issues
Red	Significant issues
Grey	N.A.

Table 2: E&S Risks & Performance Overview