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Debswana Cultural Heritage Procedure	
Policy Owner	Head of Corporate Affairs
Policy Reference	PO-CA-0014
Effective Date	01 September 2022
Related Procedures/Guidelines or Policies	Debswana Social Performance Policy (GCA/CA/007) Debswana Human Rights Policy Debswana O.D.O.T Strategy 2024 Social Way version 3.0 Building Forever Strategy

1.0 INTRODUCTION

The purpose of this policy is to detail Debswana operations' approach to Cultural Heritage Management. By implementing this policy, Debswana shall fulfill its requirements under national law including Monuments and Relics Act (2001) and the Environmental Assessment Act (2010) and its commitments to cultural heritage management according to Requirement 4H of the Social Way 3.0 Assurance Framework and the International Finance Corporation (IFC) Performance Standard 8 on Cultural Heritage.

2.0 SCOPE

This policy applies to all activities related to Debswana operations, including current operations, expansions and new projects (including projects related to socio- economic development activities that may have an impact on cultural heritage).

3.0 OBJECTIVES

The objectives of the cultural heritage policy are to:

3.1 Protect cultural heritage from any adverse impacts of Debswana mining activities and to support its preservation.

3.2 Enhance, where possible, the value of cultural heritage in all areas where Debswana mining activities and non-mining activities have the potential to impact.

3.3 Promote the equitable sharing of benefits from the use of cultural heritage that Debswana impacts.

4.0 DEFINITIONS

The definition of cultural heritage is provided in the Social Way v3, where Cultural heritage refers to:

4.1. Tangible heritage, both movable and immovable objects (e.g. properties, graves, sites, structures, or groups of structures) that have archaeological, paleontological, historical, cultural, artistic or religious value. Natural features or objects that embody cultural values, such as sacred rocks, caves, streams or waterfalls.

4.1.2 Intangible forms of culture, that embody cultural values or are part of a living cultural

tradition such as local knowledge, innovations or community practices (also known as living heritage).

5.0 RESPONSIBILITIES

Debswana shall:

5.1. Conform, at a minimum, to the legal requirements concerning cultural heritage in Botswana, including the Environmental Assessment Act 2011 and the Monuments and Relics Act 2001;5.2 Document and map an inventory of all tangible cultural heritage (CH) across the site's area of influence that may be potentially impacted by the site or associated activities.

5.3Develop an integrated approach to avoid, and where avoidance is not possible, minimise adverse impacts on cultural heritage.

5.4 During Projects, ensure the implementation of the Requirements of the IFC Performance Standard 8 mentioned above.

5.5 Identifying, through studies and consultation with affected communities and relevant regulatory authorities, any cultural heritage risks and impacts during the environmental and social impact and risk identification process of projects and operations.

5.61.5 Implementing a Cultural Heritage Management Plan (CHMP) based on the identified risks and impacts per site. Where there is a chance of impacts to cultural heritage, Debswana will retain competent professionals to assist in the identification and protection of cultural heritage.

5.7 Implementing a Chance Finds Procedure for Projects and operations.

5.8 Ensure that Scopes of Work for Impact Assessments contracts for business partners and contractors cover the full definition of cultural heritage and are included in the document.

5.9 Ensure there is a fully implemented Chance Finds Procedure (CFP) for operations that satisfies the 2001 Act and the Social Way 3.0 and that any Chance Finds are dealt with and recorded.

5.10 Ensure Debswana staff and contractors are aware of the elements of any Cultural Heritage Management Plans (CHMP) and Chance Finds Procedures and record training and induction of staff and contractors at least annually. This awareness training should be conducted on an annual basis to refresh the knowledge of the staff and contractors.

5.11 Ensure engagements on cultural heritage and any decisions around project design or change in operations, mitigation activities, etc., are formally recorded.

5.12 Ensure CHMP and Chance Find Procedure is communicated to all relevant stakeholders including government and community stakeholders at least annually.

5.13 Oversee the behavior of contractors and site staff to ensure that the Cultural Heritage Policy is being implemented appropriately. This shall be built into and governed by contractor contracts.

5.14 Consider where possible, enhancing cultural heritage through Debswana funded or supported projects in any area of the country.

6.0 GENERAL

A Chance Find is defined as tangible cultural heritage that is encountered unexpectedly during a project or operation. When staff or contractor discovers a suspected chance find, Debswana or its contractor will cease excavation/construction and report to the Safety and Sustainable Development and Corporate Affairs Departments who will investigate the incident and treat it in accordance with the Change Find procedure and requirements above (including, if necessary commissioning an investigation by a competent professional). If chance find is


confirmed, the Mine will inform the Director of Museum and Art Gallery who will determine if, when and how the operation or project may proceed.

AMENDMENT HISTORY

Issue No	Effective Date	Date Last Revised	Amendment Details
01	13/08/2018	12/08/2018	Procedure number changed from PO-CA-006 to PO-CA-03

RELATED DOCUMENTS

Document no.	Document name	Issue date	Date of next review
Chapter 59:03	Monuments and Relics Act 12 of 2001.	August 2001	
Chapter 38:01	Wildlife Conservation And National Parks Act 28 of 1992.	July 1992	
Chapter 65:07	Environmental Assessment Act 10 of 2010.	October 2001	
Section 4H	Anglo American Social Performance Toolkit	24 December 2019	
	Chance Find Procedure	22 June 2022	

	TITLE	NAME	SIGNATURE	DATE
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