Pôlitika Fitantanana ny Toeram-Panatobiana Ambin'Akora

Teny nomen'Ambatovy ny hitantanana ny toeram-panatobiana ambin'akora ("TMF") amin'ny alalan'ny fitandroana ny fahasalamana sy ny aroloza ho an'ny mpiasa, ny olona eo anivon'ny fiarahamonina, ary miaro ny tontolo iainana voajanahary. Manaraka ny fenitra izay mifanojo sy mifanaraka amin'ny fomba amam-panao eto an-toerana sy manerantany Ambatovy, ho an'ny sehatry ny fahasalamana, aroloza, ary fikajiana ny tontolo iainana, mandritra ireo dingana rehetra eo amin'ny fivoaran'ny toeram-panatobiana ambin'akora. Ny fenitra anatiny napetrakay dia manome antoka hanatrarana sy ny hihoarana amin' ireto tanjona manaraka ireto

- Ny fifehezana ny aroloza sy ny fiantraikan'ny TMF amin'ny tontolo iainana dia mifanaraka na mihoatra noho ny fetra iombonana eto an-toerana sy manerantany, hatrany hatrany.
- Mitohy hatrany ny fanatsarana ny fahaizamanao, amin'ny alalan'ny fampandrosoana sy ny fanohanana avy amin'ny teknôlôjia sy rafi-pitantanana vaovao mifanaraka amin'ny tokony ho izy.
- Omena lanja ao anatin'ny fitantanana ny TMF ny fiantraikany amin'ny mety ho fiheveran'ny mpiraiombonantoka ny aroloza, ny tontolo ara-batana, ara-piarahamonina, ary ara-toekarena.
- Ny fitantanana ny TMF dia mitohy mandritra ny
- Ny fitantanana ny TMF dia mitohy mandritra ireo dingana rehetra lalovana amin'ny fampiasana azy, izany dia manomboka amin'ny famolavolana, ny toetoetry ny toeram-pitrandrahana, ny fanorenana fotodrafitr'asa, ny fitrandrahana, ny dingana fampihatoana sy ny fanidiana ny ozinina sy ireo milina, ary ny asa mifanjohy ao anatin'ny dingana tsirairay avy.
- Ampiharina ao anatin'ny dingana rehetra fitantanana ny TMF ny fenitra mifanaraka amin'ny fomba fanao ny injeniera.
- Voafaritra mazava tsara ny anjara asa sy andraikitra ary fahefana, ary fitaovana sy mpiasa mifanaraka amin'ny tokony ho izy no apetraka eo amin'ny sehatry ny fitrandrahana sy ny fitantanana isan'ambaratongany.
- Atao hatrany amin'ny fomba fanao mahazatra sy ara-potoana ny fifehezana ny tataon-doza sy ny fanaovana tombanezaka, mifanaraka amin'ny vokatry ny tsy fahombiazana. Olona manampahaizana mahaleo tena ivelany no mamerina mijery sy manaramaso ny valin'izany.

Misy akony amin'ny tanjon'ny orinasa ny fenitra arahina ara-pitantanana. Takiana amin'izany ny fitantanana ao anatin'ny rafi-pitantanana manara-dalàna, izay ahazoana antoka fa ireto voatanisa manaraka ireto dia apetraka na efa napetraka tao anatin'ireo dingana tsirairay lalovana mandritra ny fampiasana ny fotodrafitrasa:

- Rafitra enti-mandrefy ny fahombiazan'ny laminasa, anisan'izany ny fanarahamaso atao matetika sy ny velaran'ny ambaratongam-pizahana, ny fanamarinan-kaonty sy ny fanaovana jeritodika, ary ny fepetra takiana amin'ny lafiny fahaiza-manao eo amin'ireo mpanatontosa ny asa.
- Fandinihana ataon'ny manampahaizana mahaleo tena ivelan'ny orinasa ary rafitra hentitra enti-mandrefy ny fahombiazan'ny laminasa, izay tsy voasivan'ny sosona mpamokatra sy mpanatanteraka ao anatin'ny rafitra.
- Dingam-pitantanana araka ny tokony ho izy, hanaovana asa fanitsiana sy fanovana, ampidirina ao anatin'ny singa takiana amin'ny rafi-pitantanana sy ny drafi-pampiasana ny fotodrafitrasa.

Ampahafantarina ny mpanana petrabola sy ny Kômity Mpanatanteraka hatrany ny zava-misy ao amin'ny TMF, ary ireto manaraka ireto no hamafisina ao anatin'izany:

- Ny TMF dia novolavolaina tao anatin'ny fahafantarana tanteraka ny vokatry ny tsy fahombiazana, ny fepetra eo amin'ny toetoetry ny toeram-pitrandrahana, ary ny fepetra fampandehanana araka ny tokony ho izy;
- Ny TMF dia harafitra sy ho tantanana araka ny fetra voafaritra sy ny tondro fototra momba ny fahombiazana, ka tsindriana manokana amin'izany ny fahafaha-mifehy ny fitahirizana ireo ambin'akora sy ny fihoaran'ny tohodrano milanja ny vesatry ny ambin'akora;
- Ny TMF dia tantanana ary ho tantanana araka ny Fenitra Fitantanana ao Ambatovy;
- Mandeha araka ny drafitra napetraka tany am-pamoronana ny fanorenana, ny fitrandrahana, ny fikojakojana, ary ny fanarahamaso ny TMF;
- Araha-maso ny fampanaraham-penitra sy ny fahaiza-manao, izay tafiditra ao anatin'ny rafitra enti-mandrefy ny fahombiazan'ny laminasa anatiny sy ivelany. Fantarina, taterina, ary raisina an-tanana ny tsy fanaraham-penitra izay mety mampitombo ny tataon-doza ka tsy hanatrarana ny fikasana tany am-pamoronana;
- Namboarina, nampiharina, nohatsaraina, ary nandramana ny rafitra ho an'ny paikady vonjitaitra, mifototra amin'ny fahatakarana tsara ny vokatry ny tsy fahombiazana;
- Misy ny drafitra lavitra ezaka momba ny fanamboarana, fanarenana ary famerenana amin'ny laoniny ny TMF raha sanatria misy fahavakisany, izay niaraha-namolavola miaraka amin'ireo sampandraharaham-panjakana sy mpiombonantoka samihafa.
- Ho fanarahana ireo fepetra notakiana tao anatin'ny "Global Industry Standard on Tailings Management ("**GISTM"**)" (fenitra ho an'ny indostria manerantany mifehy ny toeram-panatobiana ambin'akora), dia nohamarinin'ny manam-pahaizana manokana (olon-tokana/kômity mpandalina ivelan'ny orinasa) tsy voakasiky ny fifanarahana ireo teboka notanisaina etsy ambony ireo, ary miankina amin'ny vokatry ny fisokajiana ny fotodrafitrasa tsirairay avy ny fotoana faritana hanaovana izany.

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Gustavo Gomes
Filohan'Ambatovy
Nankatoavin'ny filohan'Ambatovy tany am-boalohany tamin'ny 30 Novambra 2021

Tailings Management Policy

Ambatovy is committed to managing its tailings management facility ("TMF") in a manner that protects the health and safety of employees, community members, and protects the natural environment. Ambatovy is committed to standards of practice that meet and align with national and global good practices for health, safety, and the preservation of the environment during all phases of the TMF life cycle. The internal standards which we implement provide assurance that the following objectives are consistently met and exceeded.

- The levels of safety and environmental impact management of our TMF meets or exceeds national and internationally recognized thresholds at all times.
- Performance is continuously improved through the advancement and support of appropriate new technologies and management systems.
- The TMF is managed with due consideration of their impact on stakeholder perception of safety and on the physical, social and economic environment.
- The TMF is managed through the full life cycle that spans the conception, site characterization, design, construction, operation, decommissioning and closure phases, as well as continuity across the phase boundaries.
- Sound engineering practice is applied to all phases of the TMF life.
- Roles, responsibilities accountabilities and authorities are explicitly defined, and adequate resources are assigned at the operational and corporate levels.
- Risk management and assessment commensurate with the consequence of failure is carried out routinely. The results of which are reviewed and overseen by independent third-party experts.

Our management standard gives effect to the corporate objectives. It requires that governance takes place within a formal management system that provides assurance that the following will be, and has been, implemented within each of phase of the life cycle of the facility;

- An assurance program providing, among other things, for the frequency and scope of the various levels of inspections, audits and reviews as well as the specification for the competence requirements for those undertaking the work.
- Independent reviews and rigorous assurance programs that are not overly filtered by operational and functional layers within the organization.
- A formal adaptive management process for corrective action and changes incorporated into the requisite elements of the management system and life of facility plan.

The Shareholders and Executive Committee shall be regularly informed of the status of the TMF providing confirmation of the following;

- The TMF have been designed with a full understanding of the consequence of failure, of site conditions and reasonably-expected operating conditions;
- The TMF is, and will be, constructed and operated in accordance with defined thresholds and performance indicators with particular reference to containment integrity and overtopping;
- The TMF is, and will be, managed in accordance with the Ambatovy Management Standard;
- Construction, operation, maintenance and surveillance of the TMF is proceeding in conformance to design intent;
- Compliance and performance are verified as part of the Ambatovy assurance program, both internally and externally. Non-conformances that may increase risk to the point where the design intent may not be achieved, are identified, reported and addressed;
- An emergency response plan, based on a comprehensive understanding of the consequences of failure, has been developed, implemented, maintained and tested;
- A long-term reconstruction, restoration and recovery plan, in the event of a catastrophic TMF failure, has been developed in conjunction with public sector agencies and other stakeholders;
- In alignment with the requirements of the recently published Global Industry Standard on Tailings Management ("GISTM"), the above items are independently verified by suitably qualified professionals (an external reviewer/review board) at intervals dictated by the consequence classification of each facility.

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Gustavo Gomes
President, Ambatovy

Originally approved by the President of Ambatovy on: 30 November 2021