

Biodiversity Action Plan		
Effective Date: 2013.09.01	Document Number: OT-10-E14-PLN-0004-E	Version: 1.2

## Oyu Tolgoi Biodiversity Action Plan

December 20, 2016

The original Biodiversity Action Plan (BAP) for the Oyu Tolgoi (OT) project was agreed and disclosed by OT and the Lenders in August 2012 in the Environmental and Social Impact Assessment. As part of adaptive management, updates are necessary from time to time to reflect the continuing development of the biodiversity management program. The BAP may be revised, subject to OT and Lender agreement, if such agreement is required under and provided in accordance with the relevant finance documents. The current version, dated December 20, 2016, includes items completed from the 2012/2015 BAP. It will be disclosed on an annual basis. Implementation of the BAP is a requirement of the Environmental & Social Action Plan (ESAP). The ESAP is also a publicly disclosed document.

ID#	TOPIC	ACTION DESCRIPTION	COMPLETION INDICATOR	TIMEFRAME
<b>MANAGEMENT AND RESOURCES</b>				
1	Provision of adequate resources	OT will ensure that, over the long-term, its biodiversity management program, including on-site mitigation, offset management, and biodiversity monitoring is adequately resourced and financed to meet IFC's Performance Standard 6 (PS6), EBRD's Performance Requirement 6 (PR6), ESIA commitments, and to obtain net positive gain of biodiversity values.	On-going	On-going
2	Long term engagement of biodiversity science and conservation organisation(s)	<p>OT will enter into a formal engagement with reputable, qualified, and internationally recognised organization(s) to design and, where appropriate, implement OT's biodiversity management programs, including the following tasks:</p> <ul style="list-style-type: none"> <li>• Long-term biodiversity monitoring and evaluation,</li> <li>• Where appropriate, design, implement, and manage portions of the Offsets Management Plan,</li> <li>• Support in the development and implementation of the Biodiversity Management Plan.</li> </ul> <p>The terms of engagement will include processes that allow Lenders to have independent access to the expert organisation upon notification to OT that this advice and opinion is being sought.</p> <p>OT will consult with the Lenders prior to making material changes to the terms of reference for the engaged organization(s), including contract duration.</p>	<p>(i) Draft Terms of Engagement developed</p> <p>(ii) Final Terms of Engagement agreed with lenders and initiated</p> <p>(iii) Dialogue with Lenders on proposals received</p> <p>(iv) Engagement in place</p> <p>(v) Consultation with Lenders on changes to terms of reference or organisations</p>	<p>(i) Completed</p> <p>(ii) Completed</p> <p>(iii) Completed</p> <p>(iv) On-going</p> <p>(v) On-going</p>

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3	Specialist capacity	<p>OT will engage a full time, senior-level specialist or senior specialists, based in Mongolia, with, individually or together, demonstrated experience in international best practices to provide support, capability, and leadership to OT's biodiversity team in the implementation of biodiversity commitments. The senior specialist(s), individually or together, must have experience in the following areas: design and implementation of biodiversity offsets; biodiversity monitoring and evaluation; and the management of biodiversity programs of comparable scale and complexity.</p> <p>One of the senior specialists (or senior specialist) will be in a position dedicated to the management of the biodiversity program (the "Relevant Specialist"), and such position will be in place (and filled) for the period necessary to achieve sufficient capacity within OT's national biodiversity team to implement and manage the project's biodiversity commitments.</p> <p>The progress of capacity development will be subject to an annual review process that will include advice from the Project's international biodiversity organisation (as established in item 2) and consultation with the Lenders.</p>	<p>(i) Initiate recruitment</p> <p>(ii) CV of specialist(s) shared with Lenders</p> <p>(iii) Relevant Specialist established in Mongolia</p> <p>(iv) Annual review process conducted in consultation with the Lenders</p> <p>(v) Capacity development criteria developed, and agreed with Lenders</p>	<p>(i) Completed</p> <p>(ii) Completed</p> <p>(iii) Completed</p> <p>(iv) Annually</p> <p>(v) Q4 2016</p>
4	Independent scientific advisory panel	<p>OT will engage an independent scientific panel that will be established by a terms of reference to provide an opinion on a series of technical questions related to the OT – GSK road mitigation strategy and, if subsequent mandates are agreed between OT and the Lenders, other matters (a "Panel"). The Panel will consist of no more than three experts at any one time.</p> <p>The specific mandates of the Panel will be defined in individual scopes of work. As noted above, the Panel's initial mandate will be to provide an opinion on a series of technical questions related to the OT – GSK road mitigation strategy.</p> <p>Based on future mandates, if required and agreed, the Panel will provide independent scientific recommendations to the Lenders and OT on other actions necessary to achieve compliance with Performance Standard 6/ Performance Requirement 6.</p> <p>The Panel's findings will be publicly disclosed.</p>	<p>(i) Terms of reference and initial mandate finalized and agreed by OT and the Lenders</p> <p>(ii) Panel members for the initial mandate agreed by OT and Lenders and engaged</p> <p>(iii) Panel report on road mitigation (see item 13) disclosed as agreed by OT and the Lenders</p> <p>(iv) Any OT and Lender agreed actions resulting from the Panel's road mitigation strategy review are incorporated into OT management plan(s)</p>	<p>(i) Completed</p> <p>Completed</p> <p>(iii) Q3 2017</p> <p>(iv) Q3 2017</p> <p>(v) Timing as required</p>



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			(v) Subsequent mandates, scopes of work, panel members, report disclosure and actions agreed by OT and the Lenders	
<b>MONITORING AND EVALUATION</b>				
5	Monitoring and Evaluation Plan	OT will develop a Biodiversity Monitoring and Evaluation Plan (BMEP) for critical habitat species sufficient to determine project compliance, over the long-term, with respect to para. 10 of Performance Standard 6 and para. 8 of Performance Requirement 6. The BMEP will reflect OT's stakeholder engagement and will include other identified priority biodiversity species in the BMEP in a manner that is sufficient to determine project compliance with para. 9 of Performance Standard 6 and para. 8 of Performance Requirement 6. For critical habitat species and non-critical priority biodiversity values, the monitoring plan will include relevant metrics and threshold values adequate to determine compliance, over the long-term, and its design will be statistically relevant.	<ul style="list-style-type: none"> <li>(i) Draft design for BMEP submitted for Lender review</li> <li>(ii) Final BMEP submitted</li> <li>(iii) BMEP disclosed publicly (in agreed form)</li> <li>(iv) BMEP implemented and results disclosed annually, (the form of which to be agreed with the Lenders)</li> </ul>	<ul style="list-style-type: none"> <li>(i) Completed</li> <li>(ii) Completed</li> <li>(iii) Completed</li> <li>(iv) From 2016 and thereafter on-going</li> </ul>
6	Ecosystem services monitoring	OT, through the Ecosystem Services Working Group, will develop and implement a multi-disciplinary monitoring and evaluation program for critical ecosystem services. This program will build upon and integrate components of the on-going water monitoring program and include the monitoring of critical ecosystem services and the Bor Ovoo replacement spring. It should be designed in a collaborative manner with environmental and social specialists and integrated with social monitoring. The ecosystem services monitoring and evaluation program will include relevant metrics and threshold values adequate to determine compliance over the long-term, integrating adaptive management strategies.	<ul style="list-style-type: none"> <li>(i) Gap analysis completed of existing mitigation strategy for vegetation, pasture quality and ecosystem services</li> <li>(ii) Draft design for Monitoring and Evaluation Program (and as applicable, specific plan or plans) submitted to Lenders for review</li> <li>(iii) Monitoring and Evaluation Program (and as applicable, specific plan or plans) finalized</li> </ul>	<ul style="list-style-type: none"> <li>(i) Completed</li> <li>(ii) Completed</li> <li>(iii) Q4 2016</li> </ul>



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			and implementation has begun	
7	Aerial wildlife survey	To supplement ground based ungulate surveys, OT will conduct an aerial wildlife survey at regular intervals, as defined in the BMEP.	(i) TOR shared with Lenders  (ii) Survey completed	(i) Q4 2018  (ii) 2019 and thereafter at intervals defined in BMEP
<b>OFFSETS</b>				
8	Offsets Management Program and Plan	<p>OT will develop and implement an offsets management program that draws on existing strategy documents, the OT Biodiversity Management Plan, including the OT BAP workbook, and Lender requirements. The Program will include an Offsets Management Plan (OMP) that will:</p> <p>(a) present OT's preferred sustainable offset financing mechanism to support the offsets program,</p> <p>(b) include a multi-year budget plan consistent with OT's planning cycle (i.e., annual, 2 and 5 year forecasting), using as a basis the OT Offset Strategy disclosed in 2012. An update to estimated total program cost will also be included and updated periodically thereafter,</p> <p>(c) be based on corresponding NPI accounting, and</p> <p>(d) identify annual and long term milestones to be achieved to mitigate the residual impacts of project activities in critical habitats which are sufficient to obtain net positive gains of high biodiversity values through conservation actions, which in each case will ensure long term compliance with IFC's Performance Standard 6, EBRD's Performance Requirement 6 and the objective of Net Positive Gain over the life of the mine.</p>	<p>(i) Identification and evaluation of existing programs for offset pilots and update provided to Lenders</p> <p>(ii) Draft OMP submitted for Lender and IESC review, with preferred offsets financing option identified</p> <p>(iii) Final draft OMP submitted for IESC and Lender review, and Lender approval; final draft OMP will be in a form that addresses the agreed topics set out in OMP Table of Contents and meets the requirements of the BAP commitments and IFC's Performance Standard 6 and EBRD's Performance Requirement 6</p>	<p>(i) Complete</p> <p>(ii) Completed</p> <p>(iii) Completed</p> <p>(iv) Completed</p>



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			(iv) Final OMP publicly disclosed, in a form agreed by OT and the Lenders	
9	NPI accounting	In relation to the Offsets Management Plan (OMP) and future revisions to the OMP that occur as a result of adaptive management, OT will update the corresponding NPI accounting and provide the results to the Lenders.	<p>(i) NPI accounting updated based on proposed 2015 offset activities and results provided to the Lenders</p> <p>(ii) NPI accounting updated to correspond with OMP</p> <p>(iii) Updated NPI accounting publicly disclosed</p>	<p>(i) Completed</p> <p>(ii) Completed</p> <p>(iii) Completed</p> <p>and thereafter at timeframes agreed to by OT and the Lenders</p>
10	Offsets financing	The sustainable offset financing mechanism (referred to in item 8 above) as agreed with the Lenders, will be legally established, with all governance and administrative elements in place to ensure its ability to finance the long term implementation of the offsets program.	Mechanism established	On or prior to the issuance of the Environmental and Social Certificate
<b>ON-SITE MITIGATION</b>				
11	Future construction and maintenance activities in the Galbyn Gobi Important Bird	OT will avoid construction and scheduled maintenance activities in the Galbyn Gobi IBA during the lekking season of the Houbara bustard (15 April - 30 June), with the exception of emergency and other time-sensitive maintenance activities, and taking into consideration any identified sensitive areas.	<p>(i) Operations Phase Biodiversity Management Plan includes this avoidance measure</p> <p>(ii) On-going compliance</p>	<p>(i) Completed</p> <p>(ii) From 2013 on-going</p>

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	Area (IBA)		verified as part of on-site mitigation monitoring	
12	Powerline insulation	OT will insulate electrical conductors on medium voltage and/or low voltage power line poles, dead-ends, sub-stations, and pylons.	<p>(i) medium/low voltage insulation risk assessment to be commenced by specialist consultant;</p> <p>(ii) medium/low voltage insulation risk assessment to be complete by specialist consultant</p> <p>(iii) related procurement/installation works commenced in accordance with risk assessment recommendations;</p> <p>(iv) related procurement/installation works to be complete in accordance with risk assessment recommendations.</p>	<p>(i) Completed</p> <p>(ii) Completed</p> <p>(iii) Completed</p> <p>(iv) Q4 2016</p>
13	Road mitigation	<p>To facilitate compliance by the Project Company with IFC's PS6, EBRD's PR6, and OT's commitments to Net Positive Impact, OT will:</p> <p>(i) develop and implement an OT-GSK road mitigation strategy that explores, but will not necessarily be limited to, the following elements: a) road closures, restrictions on vehicle movements; b) formal engagement with regional bodies and institutions involved with regional-scale sustainable development on the implementation of certain mitigation measures that have relevance to regional-scale sustainable development; and c) traffic monitoring of the OT - GSK road as well as non-OT roads and monitoring of its impact on animal behaviour;</p> <p>(ii) Submit the road mitigation strategy for review by the Independent Scientific</p>	<p>(i) Draft strategy provided for Lender review and comment</p> <p>(ii) Strategy reviewed by the Independent Panel</p> <p>(iii) Commence implementation of strategy</p>	<p>(i) Completed</p> <p>(ii) Q1 2017</p> <p>(iii) Q3 2017</p>

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		Advisory Panel; and  (iii) Revise the strategy to incorporate the OT and Lender agreed actions for implementation that result from the Panel's review (See item 4 above)		
14	Off road traffic	Oyu Tolgoi will:  (i) develop and distribute communication materials on the impacts of off-road driving and its implications for livelihoods and wildlife conservation as part of its information and education outreach linked to on-going stakeholder engagement efforts; and  (ii) incorporate requirements related to off-road driving into its contractor management program and induction training for all new staff and contractors.	(i) Communication materials will be included in IESC monitoring activities  (ii) Contractor and staff training materials updated to include content on impacts of off-road driving	(i) 2016, then ongoing based on audit schedule  (ii) Completed
15	Biodiversity training module	OT will (i) develop a training module for construction/operations personnel (operator and contractors) on a suite of biodiversity related topics including driver awareness and rules, waste disposal and litter, illegal plants and wildlife products; (ii) mainstream biodiversity-related topics as part of toolbox talks; and (iii) review their current induction program to ensure that any updated commitments are included, as appropriate/relevant.	(i) Training module submitted to Lenders  (ii) and (iii) Activities implemented	(i) Completed  (ii) and (iii) On-going
<b>STAKEHOLDER ENGAGEMENT</b>				
16	Stakeholder engagement plan	OT will develop a targeted Stakeholder Engagement Plan covering (i) implementation of on-site biodiversity mitigation; (ii) implementation of offsets management program and plan; and (iii) engagement related to regional/landscape level planning.	Stakeholder Engagement Plan updated	Completed
17	Stakeholder engagement on offset program	OT will carry out a sustained stakeholder engagement and consultation to help ensure that its biodiversity offset program reflects regional level planning considerations, is consistent with national conservation priorities and stakeholders' interests, and that is both technically and politically feasible over the long term. This will include engaging the Government of Mongolia, regional bodies, other mining companies, project affected communities, and interested stakeholders (e.g., Tripartite Council: local herders, regional government, and OT).	OT's on-going engagement documented in reports communicated to Lenders (e.g., such as annual monitoring reports, independent environmental and social monitoring reports, etc.), with dates and minutes of meetings submitted to Lenders	As documented in annual monitoring reports and IESC reports



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MANAGEMENT PLANS AND PROCEDURES				
18	Rehabilitation	<p>Oyu Tolgoi will develop a Land Disturbance Control and Rehabilitation Plan (LDCRP) that incorporates inputs from the Land and Biodiversity teams and includes the following procedures:</p> <ul style="list-style-type: none"> <li>(a) Updated Land Disturbance Procedure;</li> <li>(b) Updated Topsoil Handling Procedure;</li> <li>(c) Updated Technical Rehabilitation Procedure; and</li> <li>(d) Biological Rehabilitation Procedure.</li> </ul> <p>The IESC will review and verify that the LDCRP meets Lender requirements and that all relevant biodiversity commitments in the ESIA and relevant ESMPs have been incorporated.</p>	<ul style="list-style-type: none"> <li>(i) Submission of draft LDCRP for IESC review and comment</li> <li>(ii) Submission of final LDCRP for IESC review and comment; IESC confirmation to Lenders that the LDCRP meets Lender requirements and includes all relevant commitments.</li> </ul>	<ul style="list-style-type: none"> <li>(i) Completed</li> <li>(ii) Completed</li> </ul>
19	Illegal Wild Plants and Animal Products	<p>In order to influence and monitor illegal hunting or harvesting activity associated with its activities, Oyu Tolgoi will:</p> <ul style="list-style-type: none"> <li>(i) Develop and implement an Illegal Plants and Wildlife Products Procedure which: <ul style="list-style-type: none"> <li>(a) specifies requirements related to the frequency of aircraft, vehicle, and luggage/cargo inspections and the minimum number of inspections to be carried out quarterly;</li> <li>(b) specifies documentation requirements for each inspection in order to allow for a clear means of verification; and</li> <li>(c) is enforced through suitable penalties if staff or contractors are found in possession of illegal plants or wildlife products;</li> </ul> </li> <li>(ii) Conduct training to ensure that all staff and contractors are aware of the procedure and to enable camp and airport staff to recognize illegal plant and wildlife products; and</li> <li>(iii) Raise awareness of the issue through its Stakeholder Engagement Plan and associated activities.</li> </ul>	<ul style="list-style-type: none"> <li>(ia) Revised procedure submitted to IESC for review</li> <li>(ib) Finalize procedure</li> <li>(ii) Training conducted as necessary</li> <li>(iii) Stakeholder engagement activities included in SEP and implemented</li> </ul>	<ul style="list-style-type: none"> <li>(ia) Completed</li> <li>(ib) Completed</li> <li>(ii) On-going</li> <li>(iii) Q2 2016</li> </ul>
COMPLETED ITEMS				
	Bird Flight Diverters	OT will: (i) complete installation of flight diverters on high-voltage power	(ia) Begin installation of flight	(ia) Completed



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		<p>transmission line from the Chinese border to the Oyu Tolgoi site;</p> <p>(ii) complete installation of flight diverters on medium-voltage power transmission lines from the Oyu Tolgoi site to the Gunii Hooloi borefield.</p> <p>(iii) complete installation of flight diverters on medium-voltage power transmission lines from the Oyu Tolgoi site to Khanbogd <i>soum</i> centre.</p> <p>(flight diverters include “Bird Mark – Model BM-AG (After Glow)”); and the “Swan “ spiral flight diverter).</p>	<p>diverters on high-voltage power transmission line</p> <p>(ib) Complete installation of flight diverters on high-voltage power transmission line</p> <p>(iia ) Begin installation of flight diverters on medium-voltage power transmission lines</p> <p>(iib) Complete installation of flight diverters on medium-voltage power transmission line</p> <p>(iii) Complete installation of flight diverters on medium-voltage power transmission line to Khanbogd <i>soum</i> centre</p>	<p>(ib) Completed</p> <p>(iia) Completed</p> <p>(iib) Completed</p> <p>(iii) Completed</p>
Transmission line stringing	<p>OT will undertake best efforts to complete line stringing in the Galbyn Gobi Important Bird Area (IBA) by the end of April 2012, to minimise disturbance during the lekking season of the Houbara bustard (15 April - 30 June).</p> <p>With best efforts exercised, OT will also limit line stringing work to discrete line pulling points that will be checked for nearby bustard activity prior to being established; ensure that a Houbara bustard surveyor is active during the stringing work to identify any specific Bustard lekking site; where any individual lekking sites are identified, OT will consult with a Bustard specialist in order to determine the most appropriate action to avoid disturbance.</p>	<p>(i) Line stringing commenced</p> <p>(ii) Commence work with two line stringing teams within the IBA with an aim to complete works within the IBA as soon as possible</p> <p>(iii) Stringing complete</p> <p>(iv) Relevant management plan updated</p> <p>(v) Report to Lenders on</p>	<p>(i) Completed</p> <p>(ii) Completed</p> <p>(iii) Completed</p> <p>(iv) Completed</p> <p>(v) Completed</p>	

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			contractors' performance	
	Livestock crossings	Based on stakeholder consultation, OT will (i) write a work plan for the installation of livestock crossing points along the OT-Gashuun Sukhait road using signage, traffic calming techniques and other engineering features to facilitate livestock animal crossings and (ii) complete the installation of the livestock crossings.	(i) Final workplan submitted to Lenders  (ii) Start of installation (iib) Installation complete	(i) Completed  (ii) Completed
	Road signage	OT will complete road signage installation for the OT-Gashuun Sukhait Rd, OT to Khanbogd Rd and the Borefield Rd) to warn drivers of risk of collision with animals and to raise awareness of wildlife presence in the area. The signage will be consistent with the recommendations of the Western Transportation Institute.	Signs installed	Completed
	Riverine Elm & Tall Saxaul habitats	OT will assess the adequacy of current measures to mitigate the impacts on these priority features and achieve no net loss where feasible (natural habitat) and incorporate any identified additional measures in the Biodiversity Management Plan for operations and/or the Offsets Management Plan.	(i) Findings of OT's assessment submitted to Lenders  (ii) Biodiversity Management Plan and/or Offsets Management Plan includes any additional measures proposed on the basis of the assessment by OT.	(i) Completed  (ii) Completed
	NPI Protocol and Review Panel (ii)	Oyu Tolgoi will participate in the IUCN convened Net Positive Impact Protocol and Review Panel Team (NPIP&RPT) who will develop, test and implement an independent process for verification of Rio Tinto's and Oyu Tolgoi's commitment to the NPI objective.	(iia) Project-specific scope of work developed and shared with Lenders  (iib) NPI&RPT verification pilot program commenced for OT	(iia) Completed  (iib) Completed
	2012 Baseline field program – Houbara bustard	OT will commence in-field biodiversity baseline for the Houbara bustard as part of its monitoring program. The baseline will be consistent with the goals and objectives of the Biodiversity Monitoring and Evaluation Program.	(i) TOR sent to IFC for review  (ii) Teams are mobilized	(i) Completed  (ii) Completed

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	2012 Baseline field program – large ungulates	OT will commence in-field biodiversity baseline for large ungulates as part of its monitoring program. The baseline will be consistent with the goals and objectives of the Biodiversity Monitoring and Evaluation Program.	(i) TOR for ground based large ungulate surveys sent to IFC for review (ii) Teams mobilised and ground-based surveys initiated	(i) Completed  (ii) Completed
	Operations Phase Biodiversity Management Plan	OT will develop an Operations Phase Biodiversity Management Plan in line with international best industry practices and subject to Lender review that includes all identified on-site biodiversity mitigation measures, including specific roles and responsibilities for OT staff and contractors / subcontractors. The Operations Phase Biodiversity Management Plan will include commitments and actions related to construction that will occur during the operations phase. As relevant, biodiversity-related commitments will also be mainstreamed into other relevant Management Plans, such as the Transport Management Plan, Water Resources Management Plan, Waste Management Plan and Influx Management Plan.	(i) Submission of draft plan for Lender review  (ii) Submission of final plan to Lenders	(i) Completed  (ii) Completed
	Operations Phase Biodiversity Management Plan	OT will update the Operations Phase Biodiversity Management Plan once the Rio Tinto Biodiversity Action Plan process is finalized.	Submission of updated Biodiversity Management Plan for Lender review	Completed
	Operations Phase Biodiversity Management Plan	The IESC or one of the biodiversity partners not involved with the development of the Operations Phase Biodiversity Management Plan (BMP) will conduct a review of the BMP, including Annex D (Biodiversity Commitments Register) to verify that all of the biodiversity commitments in the ESIA have been incorporated into Operations Phase Management Plans or associated implementing documents. If any gaps are identified, the relevant Operations Phase Management Plans will be updated by OT to address those gaps.	(i) Submission of the BMP and Annex D to the IESC for review. IESC review complete and results submitted to Lender  (ii) BMP updated if required based on the results of the IESC review	(i) Completed  (ii) Completed
	Organisational structure	OT will designate a group of environmental and social specialists (the Ecosystem Services Group) for the operations phase that will ensure the effective delivery of socio-ecological commitments, especially those relating to	Form multi-disciplinary group, develop Terms of Reference and provide to Lenders	Completed



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		offset management.		
	Ecosystem Services Group	OT will appoint/designate the Ecosystem Services Group to be responsible for the management of ecosystem services in accordance with Applicable Lender Requirements and the delivery of commitments in the BAP. This Group will serve as the primary point of contact for the Lenders with regards to ecosystem services. This group will be supported by international biodiversity organizations (as established in item 2) and other experts on best and emerging practices in ecosystem services.	Group nominated and advised to Lenders	Completed
	Compliance management	OT will incorporate BAP, Flora & Fauna Management Plan and biodiversity-related ESIA obligations into its HSE management and assurance processes.	Biodiversity-related commitments incorporated into the HSE management and assurance processes.	Completed