

Biodiversity Action Plan		
Effective Date: 2013.09.01	Document Number: OT-10-E16-PLN-0001-E	Version: 1.3

Oyu Tolgoi Biodiversity Action Plan

Revision Date: 31 July 2018

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. The BAP was intended to guide specific scopes of work designed to address gaps in the OT plans and procedures or address specific data deficiencies. The BAP has been regularly updated and amended as required or as part of the regular document review required under the OT document review procedures. Since the BAP was first prepared, the agreed actions have been completed or integrated into OT plans (e.g., Biodiversity Management Plan OT-10-E14-PLN-0003; Offset Management Plan OT-10-E14-PLN-0007; etc.) and procedures (e.g., Land Disturbance Permit Procedure OT-10-E14-PRC-0003; Priority Plant Protection Procedure OT-10-E14-PRC-007; Illegal Wildlife, Wildlife Products and Plant Procedure OT-10-E14-PRC-0005; etc.). The final version of the BAP, as per the 2018 revision, will be maintained on the OT portal as a record of the decisions made and work done.

ID#	TOPIC	ACTION DESCRIPTION	COMPLETION INDICATOR	TIMEFRAME	SOURCE DOCUMENTS
MANAGEMENT AND RESOURCES					
		There are currently no open Topics or Actions			
MONITORING AND EVALUATION					
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	ToR to be shared with Lenders by Q4 2018 Refer to Biodiversity Monitoring and Evaluation Plan (BMEP)
OFFSETS					
		There are currently no open Topics or Actions			
ON-SITE MITIGATION					
		There are currently no open Topics or Actions			
STAKEHOLDER ENGAGEMENT					
		There are currently no open Topics or Actions			

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MANAGEMENT PLANS AND PROCEDURES					
		There are currently no open Topics or Actions			
COMPLETED OR STANDARDIZED PROCESS ITEMS					
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	Refer to Biodiversity Management Plan (BMP), BMEP, and Offset Management Plan (OMP) on the OT web site.
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> <p>a) Long-term biodiversity monitoring and evaluation,</p> <p>b) Where appropriate, design, implement, and manage portions of the Offsets Management Plan,</p> <p>c) Support in the development and implementation of the Biodiversity Management Plan.</p> <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>	(i) Draft Terms of Engagement developed	(i) Completed	Refer to contracts with GBC and SEA/WCS
			(ii) Final Terms of Engagement agreed with lenders and initiated	(ii) Completed	
			(iii) Dialogue with Lenders on proposals received	(iii) Completed	
			(iv) Engagement in place	(iv) On-going	
			(v) Consultation with Lenders on changes to terms of reference or organisations	(v) On-going	

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		OT will consult with the Lenders prior to making material changes to the terms of reference for the engaged organization(s), including contract duration.			
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>	(i) Initiate recruitment	(i) Completed	Biodiversity Principal Advisor is in the OT HSES organization chart. This is a residential role. There is a capacity building plan in places so that the Principal Advisor responsibilities are taken up by the Superintendent Biodiversity.
			(ii) CV of specialist(s) shared with Lenders	(ii) Completed	
			(iii) Relevant Specialist established in Mongolia	(iii) Completed	
			(iv) Annual review process conducted in consultation with the Lenders	(iv) Annually	
			(v) Capacity development criteria developed, and agreed with Lenders	(v) On-going	

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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>	(i) Terms of reference and initial mandate finalized and agreed by OT and the Lenders	(i) Completed	Independent Scientific Advisory Panel Report on the Oyu Tolgoi – Gashuun Sukhait Road Mitigation Strategy (2017).
			(ii) Panel members for the initial mandate agreed by OT and Lenders and engaged	(ii) Completed	
			(iii) Panel report on road mitigation (see item 13) disclosed as agreed by OT and the Lenders	(iii) Completed	
			(iv) Any OT and Lender agreed actions resulting from the Panel’s road mitigation strategy review are incorporated into OT management plan(s)	(iv) Completed	
			(v) Subsequent mandates, scopes of work, panel members, report disclosure and actions agreed by OT and the Lenders	(v) Completed	
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	(i) Draft design for BMEP submitted for Lender review	(i) Completed	Refer to the latest version of the BMEP on the OT web site.
			(ii) Final BMEP submitted	(ii) Completed	
			(iii) BMEP disclosed publicly (in agreed form)	(iii) Completed	

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		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.	(iv) BMEP implemented and results disclosed annually, (the form of which to be agreed with the Lenders)	(iv) Ongoing	
6	Ecosystem services monitoring	OT, through the Ecosystem Services Working Group (ESWG), 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.	(i) Gap analysis completed of existing mitigation strategy for vegetation, pasture quality and ecosystem services	(i) Completed	ESWG established. Ecosystem Service Monitoring and Evaluation Plan report prepared annually.
			(ii) Draft design for Monitoring and Evaluation Program (and as applicable, specific plan or plans) submitted to Lenders for review	(ii) Completed	
			(iii) Monitoring and Evaluation Program (and as applicable, specific plan or plans) finalized and implementation has begun	(iii) On-going	
8	Offsets Management Program and Plan	OT will develop and implement an offsets management program that draws on existing strategy documents, the OT Biodiversity Management Plan, including the OT BAP	(i) Identification and evaluation of existing programs for offset pilots and update provided to Lenders	(i) Complete	OMP prepared and updated regularly as

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		<p>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>(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>(iv) Final OMP publicly disclosed, in a form agreed by OT and the Lenders</p>	<p>(ii) Completed</p> <p>(iii) Completed</p> <p>(iv) Completed</p>	<p>per OT document control process.</p> <p>Annual reports for each of the offsets are prepared to track progress.</p> <p>NPI assessments and the NPI updates done by third party contractor on a regular basis are also used to track offset progress.</p>
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	(i) NPI accounting updated based on proposed 2015 offset activities and results provided to the Lenders	(i) Completed	As outline in the BMP, NPI updates are done on a 5 year cycle. These are disclosed to

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		accounting and provide the results to the Lenders.	(ii) NPI accounting updated to correspond with OMP (iii) Updated NPI accounting publicly disclosed	(ii) Completed (iii) Completed and thereafter at timeframes agreed to by OT and the Lenders	the lenders and posted on the OT web site.
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	A separate cost center has been set up to track biodiversity budgets separately from the Environment budgets.
11	Future construction and maintenance activities in the Galbyn Gobi Important Bird Area (IBA)	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.	(i) Operations Phase Biodiversity Management Plan includes this avoidance measure (ii) On-going compliance verified as part of on-site mitigation monitoring as part of the LDP process	(i) Completed (ii) On-going	Currently there are no construction activities in the Galbyn Gobi IBA. Activity review and application of controls is part of the Land Disturbance process.
12	Powerline insulation	OT will insulate electrical conductors on medium voltage and/or low voltage power line poles, dead-ends, sub-stations, and pylons.	(i) medium/low voltage insulation risk assessment to be commenced by specialist consultant (ii) medium/low voltage insulation risk assessment to be complete by specialist consultant	(i) Completed (ii) Completed	Insulation of OT lines is completed, except for a low-risk poles. OT Fauna team undertakes monthly assessments of the power lines to look for birds and monitoring

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			(iii) related procurement/ installation works commenced in accordance with risk assessment recommendations	(iii) Completed	effectiveness of the insulation and other bird mitigation. This information is summarized in annual reports and the CBM report.
			(iv) related procurement/ installation works to be complete in accordance with risk assessment recommendations.	(iv) Completed	
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 Advisory Panel; and</p> <p>(iii) Revise the strategy to incorporate the OT and Lender agreed actions for</p>	(i) Draft strategy provided for Lender review and comment	(i) Completed	<p>See Item 4 above.</p> <p>First draft of the OT-GSK road mitigation strategy was reviewed by the Independent Panel in 2017.</p> <p>Revised road mitigation strategy, incorporating the recommendations of the panel, was prepared in March 2018.</p>
			(ii) Strategy reviewed by the Independent Panel	(ii) Completed	
			(iii) Commence implementation of strategy	(iii) On-going	

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		implementation that result from the Panel's review (See item 4 above)			
14	Off road traffic	OT will:	(i) Communication materials will be included in IESC monitoring activities	(i) 2016, then ongoing based on audit schedule	Training materials part of the general site orientation as well as the driver training.
		a) 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 b) incorporate requirements related to off-road driving into its contractor management program and induction training for all new staff and contractors.	(ii) Contractor and staff training materials updated to include content on impacts of off-road driving	(ii) Completed	Periodic reviews are done during pre-start meetings. Prohibitions related to off-road driving were add the contracts.
15	Biodiversity training module	OT will:	(i) Training module submitted to Lenders	(i) Completed	Training materials developed and part of the general site induction.
		(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.	(ii) and (iii) Activities implemented	(ii) and (iii) On-going	Biodiversity topics part of the monthly HSES themes discussed at tool boxes. Period Voice of the Employees videos prepared to support the HSES themes.

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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	OT Stakeholder Engagement Plan. Biodiversity Stakeholder Engagement Plan is an appendix under the overarching OT Stakeholder Engagement Plan.
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	See Item 16
18	Rehabilitation	OT will develop a Land Disturbance Control and Rehabilitation Plan (LDCRP) that incorporates inputs from the Land and Biodiversity teams and includes the following procedures: a) Updated Land Disturbance Procedure; b) Updated Topsoil Handling Procedure; c) Updated Technical Rehabilitation Procedure; and	(i) Submission of draft LDCRP for IESC review and comment	(i) Completed	Land Disturbance Control and Rehabilitation Plan
			(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.	(ii) Completed	Land Disturbance Permit Procedure Topsoil Handling Procedure

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		<p>d) Biological Rehabilitation Procedure.</p> <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>			<p>Technical Rehabilitation Procedure</p> <p>Biological Rehabilitation Procedure</p> <p>Priority Plant Protection Procedure</p>
19	Illegal Wild Plants and Animal Products	<p>In order to influence and monitor illegal hunting or harvesting activity associated with its activities, OT will:</p> <p>(i) Develop and implement an Illegal Plants and Wildlife Products Procedure which:</p> <p>(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;</p> <p>(b) specifies documentation requirements for each inspection in order to allow for a clear means of verification; and</p> <p>(c) is enforced through suitable penalties if staff or contractors are found in possession of illegal plants or wildlife products;</p> <p>(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</p>	(ia) Revised procedure submitted to IESC for review	(ia) Completed	<p>Training materials in the general site induction that all staff receive.</p> <p>Illegal Wildlife, Wildlife Products, and Plants Procedure.</p> <p>HSES tool box themes.</p> <p>Public outreach through the Anti-Poaching Offset activities.</p>
			(ib) Finalize procedure	(ib) Completed	
			(ii) Training conducted as necessary	(ii) On-going	
			(iii) Stakeholder engagement activities included in SEP and implemented	(iii) On-going	

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		(iii) Raise awareness of the issue through its Stakeholder Engagement Plan and associated activities.			
	Bird Flight Diverters	OT will: (i) complete installation of flight diverters on high-voltage power transmission line from the Chinese border to the OT site; (ii) complete installation of flight diverters on medium-voltage power transmission lines from the OT site to the Gunii Hooloi borefield. (iii) complete installation of flight diverters on medium-voltage power transmission lines from the OT site to Khanbogd <i>soum</i> centre. (iv) (flight diverters include “Bird Mark – Model BM-AG (After Glow)”); and the “Swan “ spiral flight diverter).	(ia) Begin installation of flight diverters on high-voltage power transmission line (ib) Complete installation of flight diverters on high-voltage power transmission line (iia) Begin installation of flight diverters on medium-voltage power transmission lines (iib) Complete installation of flight diverters on medium-voltage power transmission line (iii) Complete installation of flight diverters on medium-voltage power transmission line to Khanbogd <i>soum</i> centre	(ia) Completed (ib) Completed (iia) Completed (iib) Completed (iii) Completed	Bird flight diverters were installed on powerlines. Birdflight diverters installed on new powerlines, in addition to those list here. Monitoring of bird collisions is done on a monthly basis by the OT Fauna Team. Results are summarized in the annual reports and CBM report.
	Transmission line stringing	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). With best efforts exercised, OT will also limit line stringing work to discrete line pulling points that will be checked for nearby bustard	(i) Line stringing commenced (ii)Commence work with two line stringing teams within the IBA with an aim to complete works within the IBA as soon as possible (iii) Stringing complete	(i) Completed (ii) Completed (iii) Completed	Line stringing was completed. If any new activities are required in the Galbyn Gobi IBA, these would be reviewed and mitigation developed through the LDP

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		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.	(iv) Relevant management plan updated (v) Report to Lenders on contractors' performance	(iv) Completed (v) Completed	process (see Item 11 above).
	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 (iia) Start of installation (iib) Installation complete	(i) Completed (iia) Completed (iib) Completed	Work on OT GSK road 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	Road signs installed. Location of signage reviewed as part of the review annual assessment of the khulan GPS collar data.
	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	(i) Completed (ii) Completed	LDP process tracks direct impacts to saxaul and elm trees. Elm tree and saxaul monitoring part of the Core Biodiversity Monitoring Program (CBMP).

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			the basis of the assessment by OT.		
	NPI Protocol and Review Panel (ii)	OT 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 OT'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	Net Positive Impact Review Report: Oyu Tolgoi LLC (IUCN 2013)
	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	Fauna team monitors for houbara as part of the routine monthly monitoring of wildlife on site. WSCC will be conducting regional/national houbara population study 2018-2020.
	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	Baseline studies completed. Monthly monitoring of ungulates undertaken by OT fauna team. Regional ungulate surveys are incorporated into the CBMP.
	Operations Phase Biodiversity	OT will develop an Operations Phase Biodiversity Management Plan in line with international best industry practices and	(i) Submission of draft plan for Lender review	(i) Completed	BMP

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	Management Plan	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.	(ii) Submission of final plan to Lenders	(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	BMP BMP updated on a regular basis as part of the OT document review process.
	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	Revisions to the BMP are reviewed by Lenders and IESC prior to finalizing.

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	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 offset management.	Form multi-disciplinary group, develop Terms of Reference and provide to Lenders	Completed	ESWG
	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	ESWG
	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	BAP, BMEP, OMP and related procedures