



Oyu Tolgoi LLC

Communities

Cultural Heritage Management Plan

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

Abbreviations/Acronyms

BO	Bayan-Ovoo (<i>Soum</i>)
CA	Oyu Tolgoi Umnugobi Cooperation Agreement
CH	Cultural Heritage
CHMP	Cultural Heritage Management Plan
CHMS	Cultural Heritage Management System
CHP (Report)	MIHT Cultural Heritage (Report)
CHSPP	CH Site Protection Plans
DEIA	(Mongolian Regulatory) Detailed Environmental Impact Assessment
DIZ	(OT) Direct Impact Zones
DSF	CA Goviin Oyu Development Support Fund
DZ	Dalanzadgad (<i>Soum</i>)
EBRD	European Bank Reconstruction and Development
ESMP	Environmental and Social Management Plan (ESMP)
GCHSC	Gobi Cultural Heritage Studies Centre
GIS	Geographic Information System
GoM	Government of Mongolia
HSEC	Health, Safety, Environment, Communities
HSECMS	(OT) Health, Safety, Environment, Communities Management System
IFC	International Finance Corporation
IIZ	(OT) In-direct Impact Zone
OMP(s)	Operations Management Plan(s)
IA	Oyu Tolgoi Investment Agreement
KB	Khanbogd (<i>Soum</i>)
LDP	Land Disturbance Permit
MAS	Mongolian Academy of Sciences
MIHT	Mongolian International Heritage Team
ML	Manlai (<i>Soum</i>)
MLA	Mine Lease Area
MOC	Management of Change
NGO	Non-Governmental Organisation
OSEP	Oyu Tolgoi Umnugobi Stakeholder Engagement Plan
OT	Oyu Tolgoi LLC
TPC	Tripartite Council

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

CONTENTS

- 1. INTRODUCTION 5**
 - 1.1 PURPOSE 5
 - 1.2 APPLICATION..... 5
 - 1.3 COMMENCEMENT..... 5
 - 1.4 AUTHORITY AND MANAGEMENT 5
- 2. SCOPE 6**
 - 2.1 SCOPE OF THIS MANAGEMENT PLAN..... 6
 - CULTURAL HERITAGE – DEFINITION..... 6
 - 2.2 6
 - TYPES OF CULTURAL HERITAGE COVERED BY THE CHMP..... 7
 - 2.3 7
 - 2.4 OVERLAPS WITH OTHER MANAGEMENT PLANS..... 7
- 3. ROLES AND RESPONSIBILITIES 8**
 - 3.1 KEY ROLES AND RESPONSIBILITIES FOR CHMP IMPLEMENTATION..... 8
 - 3.2 KEY CH STAKEHOLDERS 9
 - 3.3 KEY INTERFACES..... 10
 - 3.4 SUMMARY OF APPLICABLE STANDARDS..... 10
 - 3.5 COOPERATION AGREEMENT CH COMMITMENTS..... 12
 - 3.6 COOPERATION AGREEMENT SCHEDULE 7: NATIONAL HISTORY, CULTURE AND TOURISM..... 12
 - 3.7 CULTURAL HERITAGE MANAGEMENT SYSTEM..... 14
 - 3.8 CULTURAL HERITAGE PROGRAMME..... 15
- 4. MANAGEMENT CONTROLS 15**
- 5. IMPLEMENTATION SCHEDULE 17**
 - 5.1 REVIEW AND REVISION OF THIS CHMP 17
- 6. MONITORING 18**
 - 6.1 OVERVIEW OF MONITORING REQUIREMENTS 18
 - 6.2 KEY PERFORMANCE INDICATORS..... 18
 - 6.3 KEY MONITORING ACTIVITIES..... 19
- 7. TRAINING 21**
 - 7.1 INDUCTION TRAINING 22
 - 7.2 SPECIFIC TRAINING..... 22



Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

8. AUDIT AND REPORTING.....22

8.1 INTERNAL AUDITING.....22

8.2 EXTERNAL AUDITING.....22

8.3 RECORD KEEPING.....23

9. DOCUMENT CONTROL.....24

TABLES

Table 1: Key Roles and Responsibilities 8

Table 2: Key CH Stakeholders..... 9

Table 3: Applicable CH Standards.....10

Table 4: Key CH Management Controls..... 15

Table 5: Key Implementation Milestones.....17

Table 6: Key Performance Indicators.....18

Table 7: Key Monitoring Activities20

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

1. INTRODUCTION

1.1 Purpose

The purpose of this Cultural Heritage Management Plan (CHMP) update is to:

- affirm the scope of the CHMP and set out applicable management interfaces;
- update roles and responsibilities;
- outline applicable Standards relevant to the CHMP;
- affirm OT's commitments, operational procedures and guidance relevant Cultural Heritage management;
- affirm monitoring and reporting procedures, including Key Performance Indicators;
- affirm training requirements; and
- set out references for supporting materials and information.

1.2 Application

The requirements set out in this CHMP apply to all Oyu Tolgoi (OT) activities including those of contractors.

This CHMP is based on the Rio Tinto Communities and Social Performance standard, issued 1 April 2015. Changes to the Standard may result in changes to the CHMP.

1.3 Commencement

This CHMP applies from 1st September 2013

1.4 Authority and Management

The OT Executive Committee approved this updated Management Plan on September 1st, 2013 and it was updated in 2016.

The OT General Manager Communities is the custodian of this CHMP. It is reviewed on a two-year cycle to determine whether any updates are required, unless a more frequent update is necessary to reflect rapidly changed business, regulatory and/or community circumstance. Any requests for CHMP changes must be addressed to the GM Communities and will be subject to appropriate review and approval processes, as outlined in OT's Management of Change (MOC) procedure.

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

2. SCOPE

2.1 Scope of this Management Plan

This CHMP covers all OT activities including those of contractors. The measures described are implemented through OT's Cultural Heritage Management System procedures. Cultural heritage assessments for new work will use OT's Land Disturbance Procedure (OT-10-E9-PRC-0003-E) and an environmental assessment process undertaken within the framework of the Law on Environmental Impact Assessment.

Control of contractor activity is addressed in the Contractor Management Framework (OT-07-PLN-0001-E).

2.2 Cultural Heritage – Definition

OT follows the Rio Tinto definition of cultural heritage, which applies across all of Rio Tinto's global operations, as below:

The collective social manifestations of a community, generally handed down by tradition or with some historical association. The manifestations can be tangible, such as buildings, industrial structures and technology, landscapes and artefacts; and intangible, such as language, visual art, music, performance and customary practice.

Rio Tinto defines a cultural heritage feature/site as:

A place or object to which is ascribed cultural, spiritual, aesthetic, historic, scientific, research or social significance for past, present or future generations. This can include places of 'sacred' significance to traditional custodians, such as burial sites, performance grounds, rock art, waterholes, and hills or other physical manifestations of mythological or historical events. It also can include structures, places or remains of archaeological, industrial, paleontological, historical, religious or cultural significance at a local, regional, national and international level; may also have a more specific, legislative definition.

These definitions are appropriate to the cultural heritage values of the South Gobi region where a wide range of tangible and intangible cultural heritage values are present. There is a long history of heritage research in the region, much of which was undertaken during socialist times. Since 2002, commissioned by OT the Mongolian Academy of Sciences (MAS) has conducted more than 80 cultural heritage assessments (including 48 archaeological, 18 paleontological and 13 ethnographic surveys), greatly expanding the documented heritage of the region.

These heritage values have been described in detail in OT's Mongolian International Heritage Team (MIHT) authored Phase 1 report (*Protecting the Past, Preserving the Present: Report on Phase 1 Activities of the OT Cultural Heritage Programme for Ömnögovi Aimag*), and are therefore only briefly summarised here.

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

2.3 Types of Cultural Heritage Covered by the CHMP

Intangible Cultural Heritage

There are very important intangible cultural heritage values associated with traditional Mongolian life and nomadic herding manifest across the South Gobi, including song, music, crafts, language, spiritual beliefs, oral history and traditional Mongolian script. Intangible values may also be associated with tangible places and objects. These can be natural aspects of the landscape such as mountains (e.g. Javkhant Mountain, which also features many petroglyphs) and constructed features (e.g. ovoo). Many spiritual sites associated with myths, rituals and stories have been identified across the South Gobi region. The MIHT work confirmed that intangible cultural heritage values are of very high importance for local community members.

Tangible Cultural Heritage

Tangible cultural heritage features include both archaeological and paleontological remains. Archaeological remains, extending from the Palaeolithic (Stone Age) through the various metal ages and into the recent past with the destruction of Buddhist monasteries by the socialists in the 1930s, occur widely across the region. Different historical periods are revealed in a large range of archaeological remains, including Palaeolithic stone artefact sites, slab graves, deer statues, rock art, settlement remains, and graves, statues and ruins associated with Buddhist monasteries.

The South Gobi region is also well known for its rich paleontological heritage of dinosaur fossils and petrified wood, reflecting varying geological era environments and climates. Some dinosaur site discoveries are of international significance, such as the Shar Tsav site which, unusually, has both dinosaur footprints and bones in the same location.

2.4 Overlaps with other Management Plans

This CHMP is part of the overall suite of OMPs developed for OT, described in the Environmental and Social Management Plan (ESMP) Framework (OT-10-PLN-0001-E).

This CHMP has overlaps and cross-linkages to a number of other Management Plans, including:

- the Land Use Management Plan (OT-10-E9-PLN-0001-E), particularly in relation to implementation of the Land Disturbance Permit system;
- the Water Resources Management Plan (OT-10-E10-PLN-0001-E), particularly in relation to the Undai River and Bor Ovoo spring;
- the Stakeholder Engagement Plan (OT-10-PLN-0003-E), particularly in relation to community consultation requirements;
- the Contractor Management Framework (OT-07-PLN-0001-E), particularly in relation to contractor CHMP requirements;
- the Influx Management Plan (OT-10-PLN-0004-E), particularly in relation to the protection and maintenance of intangible heritage, traditional livelihoods and practices;

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

- the Atmospheric Emissions Management Plan (OT-10-E2-PLN-0001-E), particularly in relation to the control of dust; and
- the Labour Management Plan (HR-10-PLN-0001-E), particularly in relation to the Camp Standard and Code of Behaviour (HR-ST-01).
- the Transport Management Plan

3. ROLES AND RESPONSIBILITIES

3.1 Key Roles and Responsibilities for CHMP Implementation

Principal roles and responsibilities for the implementation of this CHMP are outlined in Table 1.

Table 1: Key Roles and Responsibilities

Role	Responsibilities
GM Communities	<ul style="list-style-type: none"> • Overall accountability for the CHMP and its implementation.
Manager Community Assistance and Partnership	<ul style="list-style-type: none"> • Detailed understanding of the CHMP and ensuring there are appropriate resources to implement. • Primary contact for OT Site personnel for CHMP implementation. • Conduct of Cultural Heritage (CH) assessment processes. • Development of specific CH Site Protection Plans (CHSPP). • Consultation with and seeking CH approvals from relevant government bodies and community groups. • Ensuring activities do not disturb CH sites without appropriate approvals. • Ensuring that personnel involved in work that may disturb CH receive appropriate training and induction to understand their CH responsibilities.
Manager Communities - Compliance and Governance	<ul style="list-style-type: none"> • Monitoring the implementation of the CHMP and relevant reporting. • Maintenance of the CHMS and this CHMP. • Ensuring the CHMP is revised on a regular basis. • Preparation for and coordination of audit and inspection. • Processing CH component of Land Disturbance Permits (LDP's). • Ensuring that the CH Geographical Information System database is up to date and integrated into OT's business processes e.g. the LDP process. • Investigation, reporting and follow up of unauthorised CH disturbances or procedural breaches. • Ensuring survey and monitoring for CH in new ground disturbance areas. • Management of statutory or policy changes.
OT leaders (particularly for	<ul style="list-style-type: none"> • Understand and comply with OT CHMS – particularly the LDP Procedure with a checklist to identify whether CH issues may be encountered and

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

activities outside the MLA)	guidance for engaging the appropriate specialists in the assessment and mitigation of potential CH impacts.
Contractors	<ul style="list-style-type: none"> Comply with OT CHMS procedures. Comply with OT CHMS requirements set out in contractor contracts.
All OT Workforce	<ul style="list-style-type: none"> Be familiar with OT CHMS procedures through induction and other training.

3.2 KEY CH Stakeholders

Key Umnugobi CH stakeholders are outlined in Table 2.

Table 2: Key CH Stakeholders

Stakeholder	Area of interest/interaction
Ministry of Education, Culture and Science	The GoM ministry responsible for sector-wide law and policy formulation, planning, regulation and supervision and ensuring the implementation of CH activities and standards.
Mongolian Academy of Sciences (and in particular, the Institutes of History and Archaeology and Palaeontology and Geology)	The scientific institution whose mission is to develop science and technology in Mongolia and provide scientific advice for the decision making government bodies in Mongolia.
Umnugobi <i>Aimag</i> and <i>soum</i> government authorities and other relevant organizations	Regional and local organizations in charge of CH policy implementation, including management of local government financial and material management.
Civil society	Supportive professional associations, local NGOs and private non-for-profit sector organisations that seek overall improvement of Mongolia's CH management.
Partnership Committee	The Partnership Committee oversees all interactions between OT, Umnugobi <i>Aimag</i> and Partner Communities in the Cooperation Agreement area. It is the forum where local government and community representatives and senior OT operations managers meet regularly to discuss and review the future, current and past impact of the OT Project on Umnugobi <i>Aimag</i> and Partner Communities. For further details refer to the OT-UM Cooperation Agreement Schedule 2.
Gobiin Oyu Development Support Fund (DSF)	As part of the OT-UM Cooperation Agreement the DSF was established in September 2015 as an independent legal entity whose goal is to contribute to the sustainable development of Umnugobi and Partner Communities. For further details refer to OT-UM Cooperation Agreement Schedule 3.

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

Stakeholder	Area of interest/interaction
Tripartite Council	Formalised committee comprising elected KB herder representatives, KB government representatives and OT managers that oversees all OT-herder interactions in KB <i>Soum</i> , including on CH matters.

3.3 Key Interfaces

Key interfaces in the implementation of this CHMP include:

- Environment and Biodiversity team, particularly in relation to LDPs;
- Training team, particularly in relation to CH induction and training;
- Government Relations team, particularly in relation to government engagement and maintenance of the Gobi Cultural Heritage Studies Centre;
- Camp and Site Services, Human Resources and Contractor engagement teams, particularly in relation to implementation of the OT Camp Standard and Code of Behaviour (HR-ST-01); and
- Transportation Manager, particularly in relation to Transport Management controls.

3.4 Summary of Applicable Standards

OT complies with the more stringent of national standards, applicable lender standards or applicable Rio Tinto standards; the more stringent in effect being the OT Standard; as summarised in **Table 3**.

Table 3: Applicable CH Standards

Effective OT Standard	Requirements
Protection of CH Law of Mongolia	Requires that an authorised organisation undertake archaeological exploration and survey prior to mineral exploration or mining development. Activities cannot proceed without a permit from the authorised archaeological organisation. If items of CH value are discovered, and may be at risk, immediate notification to the <i>soum</i> governor and protection of the site is required. The excavation, relocation or destruction of immovable items of cultural or heritage value is prohibited without the explicit authorisation of Ministry for Education, Culture and Sciences.
Minerals Law of Mongolia	Licence holders shall fully-compensate owners and users of historic and CH for damages caused to them by exploration and/or mining operations.

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

Effective OT Standard	Requirements
Detailed Environmental Impact Assessment (DEIA) Requirements	Implement protective fencing, Chance Finds Procedure (CFP), contractor awareness training on CH and CFP.
World Heritage Convention	<p>The Government of Mongolia is a signatory of the World Heritage Convention. While it is not directly applicable to OT, the principles of the Convention are implemented in Mongolia through CH law and policy.</p> <p>As a signatory, the Mongolian government has pledged to conserve World Heritage sites in its territory and its national heritage. It is encouraged to integrate the protection of cultural and natural heritage into regional planning programmes, set up staff and services at relevant sites, undertake scientific and technical conservation research and adopt measures which give the relevant heritage value a function in the day-to-day life of the community.</p>
Safeguarding of Intangible Cultural Heritage Convention	<p>The Government of Mongolia is a signatory of the <i>Convention on Safeguarding Intangible Cultural Heritage</i>. While it is not directly applicable to OT, the principles of the Convention are implemented in Mongolia through CH law and policy.</p> <p>As a signatory, the Mongolian government has agreed to safeguard intangible CH present in its territory through i) identifying the various elements of intangible CH present in its territory and designating a competent body responsible for their safeguard, and ii) adopting appropriate legal, financial and other measures to manage, document and grant access to intangible CH.</p>
IFC Performance Standard 8: Cultural Heritage	<p>IFC Performance Standard 8 states:</p> <ul style="list-style-type: none"> • Project siting and design will avoid significant damage to CH. • Project (teams) will consult with affected communities and relevant government agencies to identify CH items of importance and incorporate their views into decision making process. • Developer/operator to design and implement a <i>Chance Finds Procedure</i>. • ‘<i>Critical cultural heritage</i>’ shall not be significantly altered, damaged or removed. • Requirements for community consultation, negotiation, consent and benefits if a proponent is to commercialise or exploit intangible CH maintained by local communities.
EBRD Performance Requirement 8: Cultural Heritage	<p>The objectives of PR 8 are:</p> <ul style="list-style-type: none"> • To support the conservation of CH in the context of EBRD-financed projects. • To protect CH from adverse impacts of Project activities. • To promote the equitable sharing of benefits from the use of CH. • To promote the awareness of, and appreciation of, CH where possible.
Rio Tinto Communities and Social Performance standard (Clause 1.6)	<p>CH must be managed in consultation with relevant communities. Tangible CH features and an understanding of intangible cultural values must be documented. To manage documented heritage values businesses must:</p> <ul style="list-style-type: none"> • develop and implement a fit for purpose CHMS;

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

Effective OT Standard	Requirements
	<ul style="list-style-type: none"> • design and locate activities to avoid damage to non-replicable CH wherever practicable; • if disturbance is unavoidable, seek approval as appropriate from those for whom the CH feature has significance; • address any industrial and historical heritage features and values of the business, particularly during closure; and • address changes that are occurring in local intangible values, where the changes are a result of interaction with the business.

3.5 Cooperation Agreement CH Commitments

Beyond the external-reference standards listed in Table 3, OT has also incorporated strong CH commitments and obligations with Partner Communities in the OT-UM Cooperation Agreement (CA). The CA process commenced with the signing of a Memorandum of Understanding between the Umnugobi *Aimag*, Khanbogd (KB) *Soum* and Oyu Tolgoi LLC in April 2011, setting out the broad objectives of the CA. A Process Agreement setting out the principles of negotiation and key procedures was signed in September 2012. The full Cooperation Agreement was signed by Umnugobi *Aimag*, Khanbogd, Manlai, Bayan-Ovoo and Dalanzadgad *soums*, and Oyu Tolgoi LLC on 22 April 2015.

The CA sets out how the parties will work together towards the sustainable development of Umnugobi *Aimag* and Partner *soums*. Under the CA, amongst other things, the following important topics are addressed:

- Water Management – Schedule 4
- Environmental monitoring and protection – Schedule 5
- Traditional Animal Husbandry and Pasture Land Management – Schedule 6
- National History, Culture and Tourism – Schedule 7
- Basic Social Services (Health, Culture, Education, Vocational Training & Employability) – Schedule 8
- Local Enterprise Development, Goods, Services Procurement – Schedule 9
- Public Infrastructure and Capital Project – Schedule 10

3.6 Cooperation Agreement Schedule 7: National History, Culture and Tourism

CA Schedule 7 covering National History, Culture and Tourism reiterates the mutual obligations and commitments of OT and local government agencies regarding cultural heritage matters; set out below:

Commitments

OT's commitments in relation to national history, culture and tourism and the Partner Communities are:

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

- To comply with Mongolian Cultural Heritage Law and other applicable legal and statutory requirements in relation to the protection of the cultural heritage of Partner Communities, and
- To maintain a CHMP and a CHMS that protect cultural heritage during the development and operation of the OT Project.

Obligations

The Parties (Umnugobi *Aimag*. Partner soums of KB, BO, ML and DZ, and OT) agreed the following CHMP-relevant obligations:

- To work together and with other relevant parties to identify ways to preserve and promote Umnugobi cultural heritage and history.
- To work together and collaborate with relevant Mongolian Governmental Authorities and other relevant parties to implement OT's CHMP to protect the Partner Communities' tangible and intangible cultural heritage.
- Umnugobi *Aimag* will direct and lead efforts to protect Umnugobi *Aimag*'s natural heritage and tangible and intangible cultural heritage.
- Umnugobi *Aimag* will take an active part in the establishment and ongoing operation of the proposed 'Gobi cultural heritage study and development centre', aimed at protecting and promoting studies of Umnugobi history and cultural heritage.
- To work together in the identification of projects and programs which have the potential to qualify for support from the DSF and, through the Partnership Committee, support suitable proposals that aim to foster the continuity and development of the 'living culture' of Partner Communities.
- OT will inform the CA Partnership Committee, Partner Communities, the Institute of History and Archaeology and the Institute of Palaeontology and Geology in advance of any planned excavation or mining in new areas.
- OT's land disturbance procedures will require that archaeological, paleontological and ethnographic preservation investigations be undertaken in advance to ascertain whether land disturbance can be avoided through design and placement.
- OT will select construction designs and placements that, to the greatest extent practicable, minimise or avoid impact on identified places of historical and cultural importance.
- OT will involve the Institute of History and Archaeology in any OT-commissioned historical and ethnographic surveys.
- OT will maintain and share with the CA Partnership Committee and Partner Communities a list of traditional sacred places located in the CA area, inclusive of landscape, natural features such as mountains and springs that have spiritual or sacred value to local residents, as well as cairns, ovoos and burial places. Myths, taboos and rituals associated with these places may also be recorded.
- OT will adhere to a 'chance finds procedure' during land clearance and related construction activities and organise rescue excavations if identified by the Institute of History and Archaeology or the Institute of Palaeontology and Geology as necessary.
- OT will include training in the 'chance finds procedure' in OT's employee and contractor induction program and include 'chance finds procedure' requirements in all contractor and sub-contractor contractual requirements. OT will provide all personnel and contractors involved in land clearance work with training in the 'chance finds procedure'.

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

- When requested through the Partnership Committee, OT will implement a ground-breaking ceremony involving the local community in the blessing of any new OT construction site.
- OT will provide induction to OT employees and contractors on cultural heritage awareness, including cultural sensitivities associated with sites of living and tangible cultural heritage and elements of the natural landscape that are ascribed spiritual significance by the Partner Communities.
- By agreement through the Partnership Committee, the Parties will prepare and distribute awareness-raising materials about the importance of cultural and historical heritage.

OT's CH programs will be in accordance with the CA commitments and obligations, an approach that promotes sustainable development by empowering local institutions and community members. This shift in strategic focus from OT unilateral management to community empowerment and involvement in the CHMS means the following key principles now apply:

- All identified, direct and adverse impact management controls, including the mitigation of any OT direct adverse impacts, remain the sole responsibility of OT.
- All projects and programs aimed at preventing future negative CH impacts and promoting positive CH outcomes are managed through the CA Partnership Committee.

3.7 Cultural Heritage Management System

OT's CHMS is essentially a set of procedures and processes that ensure the management and protection of CH at the interface of OT activities. The main CHMS processes and procedures include:

- Community consultation
- Land Disturbance Permits
- Cultural heritage assessments
- Cultural heritage site protection plans
- Cultural heritage management and mitigation measures
- Training and inductions
- Information and data management (including the CH GIS)
- Monitoring and incident management process (including *Chance Finds Procedure*).

Within these processes and procedures, cultural heritage assessments play a key role. Beyond protection of what is currently known, triggering an assessment involves a step up in resourcing and information gathering. Active assessments are necessary when there is a serious risk of disturbance to undocumented cultural heritage features and they frequently lead to an increase in the documented CH knowledge base of the region. The key triggers that initiate a Cultural Heritage Assessment are:

- Request by an OT-associated party for a Land Disturbance Permit. - if the area to be covered by the LDP has not previously been assessed, a Cultural Heritage Assessment will be required.
- Concept Level Project Planning – if a new project that will involve substantial land disturbance is in concept planning stage, a Cultural Heritage Assessment is required. The Rio Tinto Study

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

Definition Guidance Note and Community and Social Performance Projects Roadmap clearly set out the level of cultural heritage assessment required for each stage of the proposed Project planning and execution.

3.8 Cultural Heritage Programme

Beyond the transactional protection of specific locations, the OT MIHT Report also provided a long-term strategy for the protection and promotion of CH in the South Gobi generally. This included a CH framework with specific programmes to protect the intangible heritage of the OT Direct Impact Zones (DIZ) and Indirect Impact Zones (IIZ). CHP implementation as set out in the MIHT report included the establishment of the Gobi Cultural Heritage Studies Centre (GCHSC) as a facility within the Mongolian Academy of Sciences (MAS). The Centre collaborates with the Umnugobi *Aimag* and *soum* authorities, and with OT and other stakeholders to develop and implement the recommended framework and programmes that will ensure long term CH protection. The proposals and interim CH measures in the CHP report are now incorporated and managed within OT’s CHMP, including:

- working with the MAS, the Umnugobi *Aimag* and *soum* authorities, and other relevant stakeholders (as listed in Table 3) to establish the GCHSC; and
- partnering with relevant stakeholders to undertake specific CH protection programmes in line with the priorities identified in the MIHT CHP and now the CHMP.

4. MANAGEMENT CONTROLS

A range of management controls were developed to manage the risks and potential impacts to CH identified in the original OT Project ESIA. The key management controls remain relevant and current, and are set out in Table 4 together with references to documentation where further information on implementation is available.

Table 4: Key CH Management Controls

ID	Topic/ Aspect	Applicability / Activity	Control Description	Responsible Parties	Means of verification
CH0 1.1	Loss of CH sites / objects	Mine, Infrastructure + other OT controlled areas OT activities in non-OT controlled areas	Implement OT CHMS procedures, including CH component of Land Disturbance Permits. - ongoing	Communities team, HSE Construction Geology	CHMS audit + inspection p CHMS monitoring reports Land Disturbance Permit audits
CH0 1.2	Loss of CH sites / objects	Construction and operations activities	Provision of CH and chance finds procedure induction to OT personnel and contractors. - ongoing	Training Communities team	Training materials Training records

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

ID	Topic/ Aspect	Applicability / Activity	Control Description	Responsible Parties	Means of verification
CH0 1.3	Loss of CH sites / objects	Mine Licence Area	Cultural Heritage Site Protection Plans fully implemented. Replica model of OT Hill displayed at OT site public museum and used in school/public tours.	Communities team <i>Local govt. + organisations</i>	Audit + inspection programme
CH0 2.1	Indirect disturbance to CH sites/objects	Operations / Project related activities	Implement OT CHMS procedures (include physical protection and monitoring of identified CH sites at risk (demarcation, fencing, signage)) – ongoing	Communities team	Audit + inspection programme CHMS monitoring reports
CH0 2.2	Indirect disturbance to CH sites/objects Impacts on intangible heritage	Operations / Project related activities	Umnugobi CHP report proposals implemented through CA schedule 7 National History, Culture and Tourism.	Communities through Cooperation Agreement Partnership Committee <i>National + local govts., local + other stakeholders</i>	Audit programme – correspond. CHMS monitoring reports
CH0 3.1	Deliberate disturbance / desecration of CH sites / objects	Operations / Project related activities	Provision of cultural awareness training to OT employees and contractors – ongoing	Human Resources Communities	Training materials Training records
CH0 3.2	Deliberate disturbance / desecration of CH sites / objects	Operations / Project related activities	Identification and protection of traditional sacred places and associated cultural traditions / norms of behaviour as part of OT CHMP	Communities , through Cooperation Agreement Partnership Committee <i>National + local govts., local + other stakeholders</i>	Audit programme - reports + outputs
CH0 3.3	Deliberate disturbance / desecration of CH sites / objects	Operations / Project related activities	OT Umnugobi Stakeholder Engagement Plan (OSEP) includes consultation with herders, local community and stakeholders on LDPs, site documentation and monitoring and incidents. - ongoing	Communities team	Audit and inspection programme

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

ID	Topic/ Aspect	Applicability / Activity	Control Description	Responsible Parties	Means of verification
CHO 4.1	Impacts on intangible heritage		Annual support for KB Naadam Festival and other <i>soum</i> cultural events in DIZ and IIZ – ongoing as part of CA Thematic Schedule 7 National History, Culture and Tourism)	Communities team through Cooperation Agreement Partnership Committee (Audit programme - Records of funding requests and payments
CHO 4.2	Impacts on intangible heritage		Financial support for heritage museum extension in Khanbogd <i>Soum</i> centre, shifted to Dalanzadgad <i>soum</i> that is implemented through DSF. implemented through CA schedule 7 National History, Culture and Tourism.	As above.	Audit programme - engagement records, plans, funding records

5. IMPLEMENTATION SCHEDULE

5.1 Review and Revision of this CHMP

This CHMP is reviewed every two years and any necessary revisions made to reflect the changing social circumstances and/or operational needs of OT. Review and revision of the CHMP is the responsibility of OT General Manager Communities.

If material changes to operating procedures are required (as identified through OT’s Management of Change procedure), the CHMP may be updated on an ‘as required’ basis.

Any revisions to the CHMP will be uploaded to the OT Portal to ensure that all OT staff have access to the latest version. Key Implementation Milestones are set out in Table 5.

Table 5: Key Implementation Milestones

Activity	Target Date
OT CHMS Procedures Guide	Complete
OT Hill CHSPP fully implemented	Complete
Establishment of Gobi Cultural Heritage Studies Centre (GCHSC) with CA DSF resourcing <ul style="list-style-type: none"> • CHP Advisory Board in place • Stakeholder Workshops • GCHSC Feasibility Study • Establishment of GCHSC by MAS 	Complete Complete Complete Complete and operating
CHP implementation – ongoing under CHMP, with resourcing by the DSF <ul style="list-style-type: none"> • CHMP developed for critical CH sites 	Complete

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

Activity	Target Date
<ul style="list-style-type: none"> Capacity development training for <i>soum</i> cultural centre + museum + other employees <i>Soum</i> cultural projects - various Various MAS CH documentation, publication, management projects 'Culture Ger' established at OT Main Gate, maintained by KB Elders Association with direct support from OT 	Ongoing Ongoing Ongoing Ongoing
<ul style="list-style-type: none"> New Museum in Dalanzadgad <i>soum</i> implemented through the DSF 	Q3 2019

6. MONITORING

6.1 Overview of Monitoring Requirements

The monitoring measures maintained during OT operations phase to assess compliance with CH Standards (see *Section 3*) are described in this section.

In the event that monitoring identifies non-conformance with the CH Standards, these will be investigated and appropriate corrective actions undertaken (see OT CHMS Section 3, and Element 14 Non-conformance incident and action management of the OT HSEC MS).

6.2 Key Performance Indicators

Key performance indicators for the CHMP are set out in Table 6.

Table 6: Key Performance Indicators

ID	KPI	Target	Monitoring Measure
CH-KPI 01	Reported non-compliances against the key management controls identified in this CHMP	<ul style="list-style-type: none"> Minimise number of reported non-compliances and target zero. 	<ul style="list-style-type: none"> Review of records of Land Disturbance Permit Procedure Review of records of CHMS audit and monitoring reports Review incident reports
CH-KPI 02	Reported completion of key management controls identified in the OT Hill CHSPP	<ul style="list-style-type: none"> CHMP implemented, public display in place. 	<ul style="list-style-type: none"> Complete with on-going public display
CH-KPI 03	Reported non-compliances against the key management	<ul style="list-style-type: none"> CH site protection plans developed and implemented. Minimise number of reported non-compliances and target zero. 	<ul style="list-style-type: none"> Review of records and CHSPP audits

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

ID	KPI	Target	Monitoring Measure
	controls identified in CHSPPs		
CH-KPI 04	Number of staff completing Cultural Induction and Training	<ul style="list-style-type: none"> CH induction in place and undertaken by all earthwork project personnel and contractors within six months of commencing work. Zero violation in relation to traditional sacred sites and features of living tangible heritage. 	<ul style="list-style-type: none"> Review of training records Review of CH records and grievance records
CH-KPI 05	Intangible CH documentation implemented	<ul style="list-style-type: none"> Implementation of intangible CH documentation actions under the CHMP. 	<ul style="list-style-type: none"> Regular review of CHMP in CA Partnership Committee and TPC
CH-KPI 06	Intangible CH protection implemented	<ul style="list-style-type: none"> Training of OT personnel and contractors to include intangible CH. Implementation of CHMP actions to preserve intangible CH. Annual support for KB Naadam Festival. KKB museum extension supported and complete. Culture Ger' established at OT Main Gate 	<ul style="list-style-type: none"> Regular review of CHMP in CA Partnership Committee and TPC CA and DSF Annual Report CH references
CH-KPI 07	Number of CH related complaints from local communities	<ul style="list-style-type: none"> Investigate any complaints in relation to CH (desecration, disturbance, removal, trafficking of artefacts) and take appropriate action. Provide rapid response to any complaints from local communities in relation to inappropriate cultural behaviour by personnel. Investigate and take appropriate action within timeframe specified in OT grievance procedure. 	<ul style="list-style-type: none"> Review of complaints database

6.3 Key Monitoring Activities

Key monitoring activities for any OT activity that can potentially disturb CH ('disturbance activities') focus on the topics and methods set out in Table 7

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

Table 7: Key Monitoring Activities

ID	Topic/Aspects	Methods	Periodicity	Location
CHm01	Implementation of CH requirements in Land Disturbance Permit Procedure	<ul style="list-style-type: none"> All necessary Land Disturbance Permits being completed and signed off, including CH sign-off. Physical copy of LDP maintained on file by the OT Environment Department. Each LDP area being inspected post disturbance for compliance with LDP CH conditions within six months of completion. Chance Finds Procedure implemented for each LDP/disturbance activity. Physical copy of reports on Chance Finds maintained on file by RDSP. 	Six-monthly during new disturbance activity, annual thereafter	All construction and operations areas where Land Disturbance Permits are required
CHm02	CH training	<ul style="list-style-type: none"> Number of disturbance activity personnel and contractor workers trained in Chance Finds Procedure 	Six-monthly during new disturbance activity, annual thereafter	OT site
CHm03	CH incidents	<ul style="list-style-type: none"> Number of incidents reported in each monitoring period. All incidents investigated and mitigation measures implemented where required, and signed off. Physical copy of incident reports maintained on file by the Communities team. 	Six-monthly during new disturbance activity, annual thereafter	Across the Project Area

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

ID	Topic/Aspects	Methods	Periodicity	Location
CHm04	Indirect disturbance to CH sites/objects	<ul style="list-style-type: none"> CH Site Protection Plans (CHSPP) developed and implemented for all relevant sites in proximity to new disturbance activities. Physical copy of CHSPP maintained on file by Communities team. At threat and significant CH sites are formally monitored under the OT CHMS CH monitoring programme and related procedure. Physical copy of monitoring reports maintained by OT. 	Six-monthly during new disturbance activity, annual thereafter	All CH sites
CHm05	Deliberate disturbance / desecration of CH sites/objects	<ul style="list-style-type: none"> Number of Project personnel and contractor workers covered by cultural induction and training. Number of complaints received. Complaints logged, responded to and closed out. 	Six-monthly during new disturbance activity, annual thereafter	All CH sites
CHm06	Impacts on intangible heritage	<ul style="list-style-type: none"> CA Partnership Committee report on implementation of public educational programmes on CH under CA Schedule 7 - National History, Culture and Tourism. 	Annually	Umnugobi wide

7. TRAINING

CH awareness and LDP/CFP training is provided as part of general workforce induction training, and activity/job-specific training is provided as necessary.

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

7.1 Induction Training

CH awareness training is included in:

- visitors' induction training;
- general site induction for all OT personnel and contractors; and
- "new starter orientation pack" for all OT personnel and contractors.

7.2 Specific Training

Disturbance activity/job-specific training requirement is determined on a case by case basis according to the location, job function and the specific roles and responsibilities of each job. Personal training profiles are updated annually and help define job-specific training needs.

Disturbance activity /job-specific training includes:

- CHMS training is provided for specific roles that have accountabilities under the CHMS;
- Activity-specific detailed CH inductions are provided for activities involving LDPs and CHSPPs;
- Training in the CFP is provided to relevant OT personnel and contractors (such as those operating earth-moving equipment); and
- CH content is included in the OT portal module on incident reporting and investigation.

8. AUDIT AND REPORTING

8.1 Internal Auditing

Periodic inspections are carried out by operational and HSEC personnel covering a range of operational and HSEC aspects relevant to disturbance activities outside the MLA.

Any CH disturbance observations or incidents identified during these inspections are reported to the incident management system (Element 14 of OT's HSEC MS).

Procedural conformance of CH elements within ESIA and management plans is also monitored annually via internal audit in accordance with Element 16 of OT's HSEC MS. All non-conformances identified during these audits are reported in the OT HSEC MS as described in the Environmental ESMP Framework Document.

8.2 External Auditing

Conformance with this CHMP is subject to periodic assessment as part of the Rio Tinto HSEC Business Conformance Audit programme and by Project Financing Independent Environment and Social Consulting monitoring visits.

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

8.3 Record Keeping

Records of audits, inspections and incidents are managed in accordance with Element 8 Documentation and Document Control and Element 15 Data and Records Management of OT's HSEC MS.

The Rio Tinto Business Solution is used to record Internal and External Audit findings and related actions and any CH incidents and related investigation and actions.

Cultural Heritage Management Plan		
Effective Date: 2013.09.01	Document Number: OT-10-PLN-0002-E	Version: 1.3

9. DOCUMENT CONTROL

File Name	OT-10-PLN-0002-E-Cultural Heritage Management Plan V1.3
Description	Cultural Heritage Management Plan
Original Author(s)	Land and Cultural Resource team
Creation Date	2013.09.01
Approved By	Baigalmaa Shurka, GM Communities
Approval Date	2019.02.18
Change Record Number	##

Risk Ranking	Assessment Date	Risk Assessor	Review Schedule	Next Review Date
Moderate	2019.10.15	Baigalmaa Shurka, GM Communities	2 Yearly	2021.10.15

Version	Revision Date	Author(s)	Approved By	Revision Notes
1.0	2013.09.01	Baigalmaa Shurka, GM Communities	OT Executive Committee	Approved version
1.1	2013.11.23	Munkhtsatsral.L	OT Executive Committee	Corrected the number of reference documents and completed the document control section.
1.2	2015.10.15	Sugar Gonchigjantsan Mahoney D'Alterio	Baigalmaa Shurka	OT NOC 2016-01 Periodic review Incorporate Cooperation Agreement.
1.3	2019.02.18	Sugar Gonchigjantsan	Baigalmaa Shurka	Periodic review Steady State Operations