



SimFer (Simandou Project) Human Rights Impact Assessment

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ARTICLE ONE

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Executive Summary

Consistent with its commitment to respect human rights and conduct ongoing human rights due diligence, SimFer¹ engaged Article One to conduct Human Rights Impact Assessments ([HRIAs](#)) of the Simandou Mine Blocks 3 & 4 (SimFer Mine) and related infrastructure (i.e. the SimFer Rail Spur and SimFer Port, together “Infrastructure”) in Guinea. Additional aspects of the overall Simandou operations, including Mine Blocks 1 & 2, the Mainline Rail, and sections of the Port are being developed by Winning Consortium Simandou ([WCS](#)). SimFer is working with WCS to co-develop the related infrastructure which will be transferred to and operated by La Compagnie du TransGuinée (CTG). Risks and impacts related to CTG and WCS’s operations and activities are out of scope for these assessments.

This report summarizes the findings of the assessments of Mine Blocks 3 & 4 and the related infrastructure within SimFer’s scope. It is designed to provide transparency on both the assessment process and outcome.

The [Simandou Project](#) presents a unique opportunity to deliver significant economic and social benefits to Guineans. Its development provides an opportunity to positively impact the lives of Guineans for generations to come. However, to realize these opportunities, the Simandou Project must navigate a complex context marked by inherent human rights risks.²

Article One identified a range of salient³ risks and impacts across the SimFer Mine, SimFer Rail Spur, and SimFer Port. These risks and impacts are categorised into five key themes:

1. **Labour Rights: Employees** – including the right to life and security of persons, safe and healthy working conditions, and the right to non-discrimination.
2. **Labour Rights: Contractors and Supply Chain Workers** – including the rights related to employees as well as the right to forced and child labour, just and favourable conditions of work, and freedom of association.
3. **Land Access and Use** – including the right to an adequate standard of living and to cultural rights.
4. **Community Health, Safety, and Wellbeing** – including the right to a clean, healthy, and sustainable environment, water, life and security of person, adequate standard of living, health, and education.
5. **Grievance Mechanisms** – including for employees, supply chain workers and communities.

To address these and other risks and impacts, SimFer has a range of management plans in place, including human resources policies, a supplier management programme, compensation frameworks and livelihood restoration plans, as well as security procedures, community investment programmes, and grievance mechanisms. While many of these plans are effective at mitigating risk, Article One found inconsistencies in implementation and efficacy, especially in relation to management of contractors and suppliers, the health, safety and wellbeing of communities, and the provision of effective grievance mechanisms. It is important to note that SimFer made significant efforts to address these concerns since the conclusion of the assessment process in June 2024.

¹ Being SimFer Jersey Limited for the SimFer Mine and SimFer Infracore Limited (a wholly owned subsidiary of SimFer Jersey Limited) for the Infrastructure. SimFer Jersey Limited is owned as a joint venture between the Rio Tinto Group (53%) and Chalco Iron Ore Holdings (CIOH) (47%). CIOH is currently owned by Chinalco (75%), Baowu (20%), China Rail Construction Corporation (CRCC) (2.5%) and China Harbour Engineering Company (CHEC) (2.5%).

² [2022 Human Development Index](#) categorised Guinea as having ‘low’ human development. [2024 Freedom House Freedom in the World Report](#) rated Guinea as ‘not free.’

³ Those human rights that are at risk of the most severe negative impacts through a company’s activities or business relationships. |

Detailed recommendations to address surfaced identified risks and impacts have been shared with SimFer. These recommendations included five cross-cutting areas of guidance:

1. Fully implement the recommendations from the [Environmental Impact Assessment and Social Assessment \(ESIAs\)](#), Environmental and Social Management Plan ([ESMP](#)), and the mitigations in the SimFer Human Rights Management Plan.
2. Continue to engage proactively and regularly with rightsholders, including employees, supply chain workers, and Project Affected Persons ([PAPs](#)).
3. Continue to address security risks and impacts, including their root causes, for employees, supply chain workers and local communities.
4. Increase engagement with [WCS](#) on human rights and support and encourage them to continue to address key environmental and human rights issues.
5. Continue to expand the framework for the provision of remedy for the SimFer Project, aligned with the UNGPs.
6. Mitigate risks associated with the construction demobilization phase of the Project, with a special focus on addressing impacts to vulnerable groups such as women, children, and the elderly.

Article One understands that many of these are being, or have already been, implemented since our initial assessment in 2024.

Introduction

Consistent with its commitment to respect human rights and conduct ongoing human rights due diligence, SimFer engaged Article One to conduct Human Rights Impact Assessments ([HRIAs](#)) of the Simandou Mine Blocks 3 & 4 (SimFer Mine) and related infrastructure (i.e. the SimFer Rail Spur and SimFer Port, together “Infrastructure”) in Guinea.⁴ In line with the UN Guiding Principles on Business and Human Rights ([UNGPs](#)), these assessments were designed to:

1. **Identify human rights risks and impacts** at the SimFer Mine, SimFer Rail Spur, and SimFer Port, based on desk research and stakeholder engagement.
2. **Assess the efficacy of existing mitigation and management measures.**
3. **Develop recommendations** to proactively prevent, mitigate and minimize adverse human rights risks and impacts.

Additional aspects of the overall Simandou operations, including Mine Blocks 1 & 2, the Mainline Rail, and sections of the Port are being developed by Winning Consortium Simandou ([WCS](#)). Risks and impacts related to WCS’s operations were out of scope for the assessment.

While the findings of any HRIA relate to a specific point in time, in this case April to June 2024, it builds on significant human rights due diligence already conducted by SimFer. This includes a 2022 independent human rights risk assessment, [ESIA](#) updates in 2022-24 on the SimFer Mine, SimFer Rail Spur, and SimFer Port, and ongoing engagement with [PAPs](#).

This Report outlines salient human rights risks and impacts across the SimFer Mine, SimFer Rail Spur, and SimFer Port. It is designed to provide transparency on both the process and outcome.

Methodology

Article One’s methodology is guided by the UNGPs and included five key phases.



1. Planning & Scoping



2. Data Collection



3. Analyzing Impacts



4. Mitigation Actions



5. Reporting

Phase 1 Planning and Scoping - assessments focused on aspects of the SimFer Mine and Infrastructure directly managed by SimFer. These include: SimFer Mine, the SimFer Rail Spur, and SimFer Port. Impacts related to CTG and [WCS](#) operations were out of scope for the assessment.⁵

Phase 2 Data Collection - Article One, in collaboration with two local partners, conducted in-depth desktop research (including an analysis of the country context) and stakeholder engagement. This included remote interviews with 31 SimFer representatives and seven local [CSOs](#). In addition, Article

⁴ Disclaimer: This document has been prepared by Article One Advisors LLC (Article One), an independent human rights consultancy, engaged by Rio Tinto SimFer, to undertake a human rights impact assessment of the SimFer Mine, SimFer Port and SimFer Rail connected to the Simandou Project. It is not intended to be used for, and should not be relied on, for any other purpose. Article One accepts no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this document by any third party. This document is based on the information available, and the assumptions made, as at the date of the document. This document is to be read in full. No excerpts are to be taken as representative of the findings without appropriate context. Unauthorised use of this document in any form is prohibited.

⁵ Different entities hold rights to elements of the Simandou project. From the Rio Tinto side, the company has established a number of subsidiaries including SimFer S.A, responsible for the Mine, and SimFer Infraco Guinée S.A responsible for the Infrastructure, including the Rail Spur and Port.

One conducted in-person engagement with over 400 stakeholders and rightsholders⁶ during two field assessments in May and June 2024. Engagements were conducted in the languages spoken by participants (English, French, Malinké, Sousou, and Mandarin).

Phase 3 Analysing Impacts - Article One analysed the data and findings in accordance with the UNGPs. This analysis included assessing the severity and likelihood of risk and impacts to determine saliency levels.⁷ In addition, Article One assessed SimFer's connection to each risk or impact. This included determining whether entities caused or may cause the harm directly, contributed or may contribute to it, or were directly linked to that risk or impact via a business relationship.⁸

Phase 4 Management Measures - Article One assessed the existence and efficacy of current mitigation and management of salient risks and impacts for the development of the SimFer Mine and Infrastructure. This included a desktop review of existing and planned policies and practices. Article One developed a series of recommendations to promote effective management of human rights across SimFer operations, supply chain, and local communities. These recommendations were workshopped during a virtual meeting and via bilateral interviews with relevant SimFer leaders.

Phase 5 Reporting - Article One produced a summary of the data and findings, and high-level recommendations in this final Report for publication.

While we are confident in the findings of our assessment, it is important to note the following potential research limitations:

- **Trust:** While we took every effort to secure the trust of all participants, given the limited time in country and the lack of prior existing relationships, we cannot guarantee that all stakeholders felt comfortable reporting all risks.
- **Small sample size:** While we engaged over 430 stakeholders, this represents only a small sample of the total group of impacted individuals.
- **Language barriers:** While we engaged with French speakers directly, the use of translators for engagement in local languages and Mandarin poses the risk of mistranslation, potentially impacting the findings of the assessments.
- **Cultural approach:** We recognise that cultural barriers may influence levels of engagement, and that our engagement with Chinese workers, albeit conducted in Mandarin using a translator, yielded less information than our engagement with other groups.
- **Undue Influence:** We recognise risks of influence, as on two occasions we observed supervisors instructing workers prior to focus group discussions.

In addition, as with all HRIAs, we prioritized hearing directly from rightsholders about their experiences. While risks and impacts outlined in this report were raised by multiple rightsholders, it is important for SimFer to conduct additional validations of surfaced risks and impacts.

⁶ All engagements were conducted in line Article One's Ethical Principles.

⁷ The salience of each actual or potential human rights risk is a combination of the severity and likelihood. Determining severity entails assessing and scoring three criteria: (a) Scale: How grave is the level of harm to the rightsholder? Or, how grave could it be?; (b) Scope: How many rightsholders could experience or have experienced the harm?; and, (c) Irremediability: How hard would it be to 'undo' the harm that may be or has been caused by the impact?

⁸ Informed by OHCHR, Article One considers the following four factors when assessing a company's connection to an impact, including whether the company: (a) incentivized harm, including whether the company's actions or omissions (failure to act) make it more likely that someone else will cause the harm; (b) facilitated the harm, including where the company adds to conditions that make it possible for someone else to cause harm; (c) failed to adequately conduct human rights due diligence in line with the UNGPs; (d) knew or should have known about the adverse impact. OHCHR: "[Response to request from BankTrack for advice regarding the application of the UN Guiding Principles on Business and Human Rights in the context of the banking sector](#) (2017) and OHCHR "[B-Tech Foundational Paper](#)."

Salient Issues & Management Measures

Article One identified a range of salient risks and impacts across the SimFer Mine, SimFer Rail Spur, and SimFer Port. These are categorised into five key themes:

1. Labour Rights: Employees
2. Labour Rights: Contractors and Supply Chain Workers
3. Land Access and Use
4. Community Health, Safety, and Wellbeing
5. Grievance Mechanisms

This Report summarizes the key salient risks and impacts across each theme and proposes high level recommendations to address management gaps. Additional detail on how these recommendations could be implemented were provided to SimFer.

Theme 1 - Labour Rights: Employees

As of June 2024, SimFer together with its contracted workforce based in Guinea had a workforce of approximately 12,500, with 80% Guinean workers and 20% expatriate workers. Under the Guinean Mining Code 100% of unqualified labourers must be Guinean. From internal engagement, Article One understands that SimFer teams seek to employ local people for 'unqualified' positions, and that at the time of the assessment 100% of unqualified workers hired by SimFer entities were Guinean and of these 55% – 60% were from communities near the Project sites.

Article One's review identified adverse risks and impacts on the following rights of SimFer employees:

- *Right to Life and Security of Person:* Employee personal security may be impacted while working on the SimFer Mine, SimFer Rail, and SimFer Port as well as in villages and towns close to the project sites. For instance, employees may be placed in harm's way if there is community unrest, including interventions by Government security forces. Employees also risk being harassed, targeted for personal harm, or kidnapped. Risks increase during incidents of unrest. For example, in July 2024, community members in Moribadou near the SimFer Mine temporarily detained employees as part of a community protest. The employees were released without physical harm.
- *Safe and Healthy Working Environment:* Based on a review of health and safety risks conducted by SimFer, SimFer entities identified critical risk including related to lifting, working at heights, and working in or near water. There are also risks to workers traveling to and from the site on on-paved roads in the dark.
- *Non-Discrimination:* The two primary impacts raised by employees related to discrimination on the basis of gender and limited opportunities for non-English speakers to fully engage at work. Only 6% of SimFer and contractor employees are female. Low numbers of women may contribute to female employees feeling isolated and, while not surfaced in rightsholder interviews, may increase the risks of bullying or harassment.⁹ In addition, while SimFer

⁹ This risk was explored in an external expert review of workplace culture across Rio Tinto's global operations, the 'Report into Workplace Culture at Rio', published in 2022 as a part of the Everyday Respect Taskforce. It found systemic bullying and high rates of sexual harassment and everyday sexism connected. Rio Tinto has implemented recommendations from this report globally.

employees speak a range of languages including French, English, foreign languages and local languages, office-based employees reported concerns that the use of English as the working language across locations limited the ability for non-English speakers to fully participate.

It is important to note that Article One's assessment also identified positive human rights observations including employee reports of just and favourable conditions of work, access to worker representation, and salaries significantly above minimum wage. Article One noted that local communities are eager for more direct employment opportunities at SimFer. For further information please see Theme 3 – Communities.

SimFer is subject to Rio Tinto's global Code of Conduct (*The Way We Work*) and the SimFer Project Standards. In addition, the Everyday Respect programme aims to reduce harmful behaviours in the workplace including bullying, sexual harassment, and racism. In terms of health and safety management, SimFer and its contractors are required to carry out appropriate competency verifications to ensure SimFer employees have sufficient expertise to safely perform their job and provide initial and regular health and safety training. SimFer personnel are required to wear relevant personal protective equipment ([PPE](#)), including uniforms, safety shoes, safety glasses, and safety headwear. Article One observed many forms of PPE in use during our site visit. Based on engagements with employees, it appears these policies have largely been effective at addressing the most salient risks, although advancing gender balance and diversity remains a challenge.

As it relates to security of persons, SimFer entities have robust security management practices which include preparing for, monitoring, and responding to incidents as they arise. In addition, at the SimFer Mine and SimFer Rail Spur, Guinean Public Security Forces have been trained on the Voluntary Principles on Security and Human Rights ([VPSHR](#)). At the time of the assessment there was no VPSHR training at the SimFer Port.

To address the risks and adverse impacts on these identified labour rights, Article One recommends SimFer:

1. Progressively advance existing health and safety practices focusing on the most vulnerable workers. As part of this, prioritize efforts to improve road safety and transport options for workers.
2. Address language challenges related to staff management.
3. Provide sufficient resources to expand existing efforts to promote gender diversity.

Theme 2 – Labour Rights: Contractors & Supply Chain Workers

Contractors working onsite and suppliers providing goods and services are a critical part of the workforce for the Simandou Project. SimFer entities contract with a range of suppliers, including construction and onsite service providers across the SimFer Mine, SimFer Infrastructure, and SimFer offices in Conakry. Under the Mining Code, contractors and suppliers must employ Guineans for all 'unqualified' positions.

Article One's assessment identified adverse risks and impacts on the following rights of SimFer contractors and supply chain workers:

- *Forced and child labour:* While no specific instances of child or forced labour were identified during the assessment, they remain a salient risk for the overall sector in Guinea.¹⁰ Article One's

¹⁰ US Bureau of International Affairs, '[Child Labor and Forced Labor Reports Guinea](#)', (2023).

research indicated that risks of forced and child labour are most prominent within subcontractors in construction and raw material inputs to construction, as well as with non-direct suppliers in food production and uniforms manufacture.

- *Right to Life and Security of Person:* As with employees, supply chain workers are exposed to risks to their personal security while working on the Project as well as in villages and towns close to the project sites. For instance, contractors and supplier employees may be in harm's way if there is community unrest, including interventions by Government security forces. As workers connected to the Project, there is a risk they could also be harassed, targeted for personal harm or kidnapped. This risk may increase during incidents of unrest.
- *Non-Discrimination:* Gender imbalance and limited promotion opportunities, in particular for local Guinean staff, were raised as challenges for contractors and suppliers. For example, women represented less than 2% of the contracted and supplier workforce at the Rail Spur and were largely confined to entry-level roles. According to one supplier these low rates are due primarily to cultural norms around the type of work that is considered appropriate for women. Additionally, some female workers reported to Article One experiences of sexual harassment while at work..
- *Just and favourable conditions of work:* Across all contractors and suppliers interviewed, issues were raised in relation to harassment, pay, living wage, on-time payments and excessive working hours – each of which are core aspects of just and favourable conditions of work. Notably, workers interviewed consistently reported that while pay levels are mostly above the minimum wage, they are not sufficient to meet basic needs, and do not meet living wage standards. This is likely caused in part due to project-induced cost inflation. Some workers at construction suppliers and their subcontractors reported working up to seven days per week.
- *Health and Safety:* A range of inherent health and safety risks and impacts were identified across locations, including lifting, working at heights, working in water, as well as operating heavy machinery. These activities are common for complicated mining projects such as Simandou. Other risks for the construction supply chain workers include landslides and cave-ins, which are particularly relevant at the SimFer Mine. The location of operations raises additional health risks, such as malaria and safety risks related to transport. In addition to these inherent risks and impacts, some workers interviewed by Article One raised concerns about a lack of PPE for the contractor and supplier workforce, and that if provided, the PPE was of low quality and rarely replaced when deteriorated.
- *Freedom of Association:* Across project sites, many contractors and supply chain workers were members of unions. However, workers at onsite service providers at the head office in Conakry, SimFer Mine and SimFer Port reported both a lack of and a desire for worker representation. In addition, some workers at construction suppliers also reported that despite a desire for representation, they do not feel they can unionize due to management resistance.

SimFer requires all third parties (including contractors and suppliers) to abide by the Rio Tinto global Code of Conduct (*The Way We Work*), the Supplier Code of Conduct, and the SimFer [Project Standards](#). These policies set expectations that third parties provide just and favourable conditions of work, including reasonable working hours, overtime, breaks and respect for the right to freedom of association. In addition, labour rights requirements of contractors and suppliers are embedded in SimFer entities' contracts. For higher risk contractors and suppliers, this includes a detailed appendix with human rights requirements, which specify that contractors and suppliers must implement a human rights management plan. Despite these standards, Article One found areas of misalignment between

contractor and supplier practices and SimFer's expectations, suggesting a need for greater oversight and accountability by SimFer. In addition, existing management practices do not extend beyond direct suppliers, and it is in Tier 2 and beyond where risks of forced and child labour are more likely to be identified.

To address the adverse risks and impacts on the rights outlined above, Article One recommends SimFer:

1. Conduct an audit to address ongoing issues of contractor and supplier non-compliance with Project Standards and contractual human rights obligations.
2. Address ongoing concerns related to supplier wage rates. In doing so, work to ensure all supply chain workers receive a living wage.
3. Develop a programme to support suppliers in conducting labour rights risk assessments of their operations.
4. Investigate and address risks of child and forced labour in SimFer's extended supply chain and sphere of influence.

Theme 3 - Land Access & Use

SimFer acquired land for development at the SimFer Mine, SimFer Rail Spur, and SimFer Port. Land acquisitions include both physical displacement of homes and economic displacement. Article One's review identified that these acquisitions have resulted in the following adverse risks and impacts:

- *Adequate standard of living:* SimFer is paying market rate for land. However, the compensation is predominantly in the form of cash, rather than replacement land. This may result in recipients spending cash on items that may not provide an economic return, placing them in long-term financial insecurity, and creating a risk of an adverse impact on the right to an adequate standard of living, including for more marginalized and vulnerable groups.
- *Cultural rights:* Civil society organizations ([CSOs](#)) reported that cultural sites in the mining zone of the Pic de Fon Forest have been and continue to be impacted, including the destruction of some burial sites which are of cultural significance.

SimFer has a robust system of plans, mitigation measures and programmes to limit and address these issues. These include Resettlement Action Plans, the [PARC](#) Compensation Framework, PARC Livelihood Restoration and Replacement Land Programmes, the Management Plan on Cultural Heritage, and a co-management plan with the Centre Forestier N'Zerekore for the Pic de Fon Forest. However, multiple concerns were raised by rightsholders regarding the pace of compensation (which Article One understands have since been addressed). While separate livelihood restoration plans have been developed, these are in the early stages of implementation. As of June 2024, Article One observed limited support for livelihood generating activities had been delivered and believe the effects of displacement and restoration are likely to become more apparent over time.

To address the adverse risks and impacts on land use and access, Article One recommends SimFer:

1. Continue to mitigate the ongoing impacts of land acquisition and use on vulnerable groups such as women and children through progressive monitoring and expedited livelihood restoration programs, as per the Resettlement Action Plans.

2. Continue to promote the benefits of using cash compensation to purchase replacement land to PARC recipients.
3. Raise awareness about efforts to preserve cultural heritage, in alignment with the cultural heritage plan.

Theme 4 - Community Health, Safety, & Wellbeing

According to CSOs, the construction and operation of the Simandou Project will result in significant climate and environmental impacts. For the construction phase, these impacts largely relate to the right to a clean, healthy, and sustainable environment as well as the right to water.¹¹ In addition, the Project has experienced Project Induced Migration (PIM) which has generated a shortage of accommodation in communities around the Project sites, increased costs for basic goods, and exacerbated existing healthcare and education deficits in some of the most affected communities.

Article One identified adverse risks and impacts related to (A) construction and (B) PIM:

A. Summary of key construction related impacts

Article One's assessment identified:

- *Right to Water:* Water is a critical resource for communities with surface streams used for agriculture, fishing, and domestic use including cooking, bathing, and washing clothes. Concerns raised across the SimFer Mine, SimFer Rail Spur, and SimFer Port included (a) diversion of water sources for project activities; (b) contamination of water sources; (c) increased turbidity in water sources due to run off from construction sites; and (d) saltwater incursion into crop-growing fields and into drinking water at the Port.
- *Right to Health:* Communities reported that noise pollution has negatively impacted their ability to go about their lives as it is affecting sleep and increasing anxiety, including among children. Construction is also producing high levels of dust, which Article One observed covered houses and vegetable gardens. Communities are concerned that inhaling dust will impact their health and called out the disproportionate health effects the dust may have on children, the elderly, and those who are ill.¹²
- *Right to a clean, healthy, and sustainable environment:* Concerns about risks and impacts on biodiversity loss and deforestation affecting ecosystems at the SimFer Mine and SimFer Rail, impacts on fish populations and future stocks at the SimFer Port, as well as air, noise, and water pollution were referenced by rightsholders, CSOs, and SimFer employees as priority risk areas requiring mitigation.

B. Summary of PIM related impacts

Article One's assessment identified:

- *Right to Life and Security of Person:* Communities consistently reported anger and disappointment about the limited number of long-term community members who have secured jobs with the Simandou Project. This has resulted in community tensions and in some cases

¹¹ For example - Human Rights Watch '[Guinea – Ensure Respect for Rights in Massive Iron Ore Project](#)', (2022); [Environmental Law Alliance Worldwide, 'Evaluation of the Climate Impact Assessment ESIA for the Simandou Blocks 1 & 2 Mining Project' \(2022\).](#)

¹² Article One did not assess health impacts directly, Statements reflect concerns raised by rightsholders.

protests. The risks to community members increase significantly if Guinea Government security forces intervene, particularly during protests, as there is a risk that they may employ excessive or lethal force. In July 2024, following Article One's in-country engagement, there was one protest in Moribadou near the SimFer Mine. As we understand, the governor requested support which led to Government security forces intervening in the protest and reportedly using excessive and lethal force, and according to some accounts, resulted in the death of two people.¹³ Article One understands that the recruitment practices of a subcontractor working with SimFer was among the key concerns of protestors.

- *Right to an Adequate Standard of Living:* Rightsholders raised pressing concerns about the inflationary impacts of PIM, reporting that even with project-based employment, it was a challenge to meet basic needs including accommodation, food, and transportation. For example, rightsholders reported that housing near the Project sites cost close to the monthly national minimum wage as of June 2024.
- *Right to Health and Education:* The expectation in SimFer ESIA's that PIM will change socio-economic circumstances aligns with Article One's assessment findings. Local communities reported population stress on schools. For example, in Konsankoro, teachers reported that the number of teachers in the school stayed the same while enrollment almost doubled in one year. In addition, PIM may result in increased risks to women and girls, who are vulnerable to approaches from men with disposable income.¹⁴ Doctors and medical personnel interviewed reported a significant increase in transmissible diseases (including HIV) and marked increase in assaults and unwanted teenage pregnancies, each of which they associated with the PIM relating to the Simandou Project.

Rio Tinto has multiple global policies and standards related the suite of rights outlined above. These include the Rio Tinto Health, Safety, Environment and Communities Policy; Rio Tinto Biodiversity Protection; and Natural Resource Management Standard. In addition, the Rio Tinto Communities and Social Performance Standard sets out required consultation and engagement with host communities and other stakeholders including a process for monitoring and evaluation.

At the SimFer project level, a suite of management plans related to community wellbeing, safety, and health were updated in 2023. In addition to management practices, the Social Investment Strategy aims to have meaningful impacts across key strategic themes that support project development while tackling broad social issues and providing sustainable benefits for communities. While Article One recognises that the effects of these management plans would not have been apparent at the time of the in-country assessments in May and June 2024, internal documents indicate delays in the rollout of plans scheduled for April 2024.

To address the adverse risks and impacts on community health, safety and wellbeing, Article One recommends SimFer:

1. In line with the ESIA's, address ongoing risks and impacts related to community health, safety, and wellbeing.
2. Expand community access to clean and safe water.
3. Address ongoing concerns regarding in-migration.
4. Investigate and address concerns about local content, as part of this take additional steps to prioritize positions for long term community residents.

¹³ [Observatoire Guineen des Mines et Metaux \(OGMM\), ND](#)

¹⁴ [Environmental and Social Impact Assessment Simandou Mine and Rail Spur Project Rio Tinto SimFer Non-Technical Summary April 2024](#)

5. Assess the long-term impacts of noise, dust, and heavy vehicle traffic on local communities, with a special focus on the disproportionate impacts experienced by vulnerable groups.
6. Address ongoing PIM related health and safety risks and impacts for vulnerable groups (e.g. women and children).
7. Formally integrate human rights considerations into the broader [HSEC](#) management plan expectation for suppliers.

Theme 5 - Grievance Mechanisms

Effective grievance mechanisms underpin the ability for rightsholders to advocate for their rights and access effective remedy. Within a large and complex project such as the Simandou Project, it is essential that employees, workers in the supply chain, and communities each have access to effective grievance mechanisms and effective remedy.

Article One's review identified the following risks and impacts:

SimFer has provided a range of tools to help provide rightsholders with access to effective grievance mechanisms and remedy. However, Article One's assessment found both limitations in the availability and efficacy of grievance mechanisms. In particular, Article One observed the following:

1. Rio Tinto's Group-wide **myVoice confidential reporting mechanism** is available to anyone who has concerns relating to the conduct of Rio Tinto or SimFer entities in Guinea. It is accessible via telephone, email, or direct conversation with a member of Ethics & Compliance or Legal teams. myVoice phone lines and web service is available 24/7 in multiple languages, including English, Mandarin, and French (Guinea's official language). However, the six local languages most commonly spoken by local communities and workers are not represented in myVoice.
2. **Framework Agreement Hotline** is available to connect concerned individuals directly to the SimFer Human Resources department. This is available to contractors and supplier workers at the SimFer Mine and the Rail Spur, but notably not at the SimFer Port.
3. **Community Grievance Management Procedure** which provides multiple channels for [CSP](#) to receive and respond to community members concerns.

When reviewing these mechanisms, Article One surfaced the following concerns reported by each rightsholder group:

- *Employees:* While many employees reported that they could access informal mechanisms (e.g. speak to their line managers about concerns) there was a lack of knowledge and use of formal mechanisms, including myVoice, where concerns can be raised anonymously if preferred.
- *Contractor and Supply Chain Workers:* While the Framework Agreement Hotline is available for some workers, it was not widely used by workers we spoke to indicating a potential lack of awareness and/or trust in the mechanism. Contractors and suppliers rely on SimFer mechanisms and have limited or no direct mechanisms for their workers.
- *Communities:* Community rightsholders consistently reported a lack of awareness of existing mechanisms and expressed limited trust that they would be effective at resolving concerns.

Rightsholders expressed that the CSP teams are an important partner to the community, including amongst more marginalized groups such as women. At the same time, community members across the SimFer Mine, SimFer Rail, and SimFer Port raised concerns about uneven and intermittent engagement by CSP teams and limited resolution of reported grievances.

In summary, despite existing informal and formal grievance mechanisms, Article One observed that many rightsholders feel unable to raise concerns and, in turn, may be excluded from accessing effective remedy for harms suffered.

To address the adverse risks and impacts related to grievance mechanisms Article One recommends SimFer:

1. Assess the efficacy of Community Grievance Mechanisms and supplier-oriented mechanisms, including by consulting with users.
2. Increase the current educational theater trainings focused on key themes of the Everyday Respect Report initiative and opportunities to report grievances.
3. Support suppliers in establishing their own grievance mechanisms.
4. Promote the reporting of all grievances among employees, supply chain workers, and community members.

Conclusion

Article One seeks to express sincere gratitude to all stakeholders – employees, supply chain workers, community members and CSO representatives – who engaged in the HRIA process. Our hope is that the findings of this assessment contribute to lasting, positive change on the lives of those affected by SimFer operations. To that end, we look forward to SimFer’s response to this assessment and continued update on the implementations of the assessment recommendations.

Appendix: Definitions

Term	Definition
CSOs	Civil Society Organisation
CSP	Communities and Social Performance
CTG	Companie Transguinéen (CTG), a joint venture between SimFer Infraco Guinée S.A., WCS, and the Government of Guinea
ESIA	Environmental Impact Assessment and Social Assessment
ESMP	Environmental and Social Management Plan
HSEC	Health, Safety, Environment & Communities
HRIA	A Human Rights Impact Assessment is a process for identifying, understanding, assessing and addressing the adverse effects of the business project or activities on the human rights enjoyment of impacted rights-holders such as workers and community members.
Infrastructure	The SimFer Port and the SimFer Rail Spur
Mining Code	The 2011 Mining Code, as amended in 2013, regulates the Mining Sector in Guinea. It introduced a range of requirements relating to social, environmental and accountability mechanisms. Notably, the Mining Code requires mining companies to submit an ESIA and to create an ESMP integrating relevant international standards.
PARC	PARC refers to the Plan d'action de réinstallation et de compensation, or Resettlement and Compensation Action Plan. IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement requires the enterprise to develop a Resettlement Action Plan that covers, at a minimum, the applicable requirements of this Performance Standard. SimFer has developed and implemented a Land Resettlement and Compensation Action Plans for the Mine, Rail Spur and Port.
PAP	Project Affected Persons
PIM	The IFC Handbook for Addressing Project-Induced In-Migration (PIM) describes project induced in-migration (or influx) as a form of migration which involves the movement of people into an area in anticipation of, or in response to, economic opportunities associated with the development and/or operation of a new project. In most projects, project development and operations will induce and may be dependent upon an in-migration of labour. Project Induced Migration can also adversely impact the project area and the 'host' communities, specifically with regard to environmental, social, and health issues.
PPE	Personal protective equipment
Project Standards	<p>The SimFer Project Standards refer to 'best international best practice in corporate governance, business ethics, sustainability and transparency, and all applicable international laws and Legislation in Force in relation to these matters'. The Project Standards are:</p> <ul style="list-style-type: none"> • Rio Tinto's Health, Safety, Environment and Community (HSEC) policies and standards policies and standards, including its Global Code of Conduct, 'The Way We Work' • Equator Principles IV

	<ul style="list-style-type: none"> • Voluntary Principles on Security & Human Rights • International Finance Corporation’s Performance Standards on Social & Environmental Sustainability • World Economic Forum’s Partnering Against Corruption Initiative • Transparency International’s Business Principles for Countering Bribery • The Extractive Industries Transparency Initiative Standard • Principles and Guidance required by the membership of the International Council on Mining and Metals
Simandou Project	<p>The Simandou Project includes:</p> <ul style="list-style-type: none"> • SimFer S.A.’s mining project covering exploration and operation of blocks 3 and 4 of the Simandou Range. SimFer S.A. is the joint-venture between the Government of the Republic of Guinea and SimFer Jersey Limited, which in turn a joint venture between Rio Tinto and Chalco Iron Ore Holdings, a Chinalco-led joint venture of leading Chinese state owned entities, including Baowu. • Winning Consortium Simandou’s mining project covering exploration and operation of blocks 1 and 2 of the Simandou Range. WCS MineCo is a joint-venture between Winning Consortium Holdings and Baowu. • With their affiliated companies, SimFer Infraco Guinée S.A., WCS Ports S.A. and WCS Railway S.A, delivering a codeveloped and co-funded 620-kilometre TransGuinéen multi-use railway; and a port on the Morebaya river South of Conakry. <p>Based on the co-development agreement, the WCS entities are responsible for constructing the 536km main rail line up to a tie-in point in the Kérouané region, a 16 km rail spur connecting its Blocks 1 and 2 to the main line and a barge wharf in Morebaya. In parallel, SimFer Infraco Guinée S.A. is building a 70 km rail spur to connect blocks 3 and 4 to the main rail line and a transshipment vessel port expansion in Morebaya. Whilst the scopes are being separately developed by the SimFer and WCS entities, they are equally funded. Once complete, the whole port and rail infrastructure ownership will be transferred to and operated by La Compagnie du TransGuinéen, the joint venture between the Government of Guinea, SimFer Infraco and WCS Infraco.</p>
SimFer Mine	Simandou Mine Blocks 3 & 4
SimFer	SimFer refers to the following entities (and its subsidiaries): SimFer S.A; SimFer Infraco Guinée S.A; SimFer Jersey Limited for the SimFer Mine; and /or SimFer Infraco Limited (a wholly owned subsidiary of SimFer Jersey Limited) for the infrastructure. SimFer Jersey Limited is a joint venture between the Rio Tinto Group (53%) and Chalco Iron Ore Holdings (CIOH) (47%). CIOH is currently owned by Chinalco (75%), Baowu (20%), China Rail Construction Corporation (CRCC) (2.5%) and China Harbour Engineering Company (CHEC) (2.5%).
UNGPs	The UN Guiding Principles on Business and Human Rights are a set of guidelines for States and companies to prevent, address and remedy human rights abuses.
VPSHR	Voluntary Principles on Security and Human Rights
WCS	Winning Consortium Simandou