



June 4, 2021

Business & Human Rights Resource Centre
www.business-humanrights.org

Ms. Skybenko,

Thank you for inviting us to comment on your post related to the Amulsar gold project in Armenia.

Lydian have been consistently constructive regarding any feedback it has received on all aspects of the Project and have always provided technical and science-based responses to all concerns raised.

As noted in our March 2018 letter to you, Orion and Osisko understand the risks associated with mining and work with their portfolio companies to offset ESG-related risks and maximize safe conditions. Lydian Armenia has committed to Orion and Osisko to comply with best practices throughout construction, operation and closure of its mine.

Orion and Osisko believe that Lydian Armenia's management team has optimized the project's design to meet best industry practice. The company has worked with reputable international and local scientific institutions, including Wardell Armstrong International, Global Resource Engineering, Treweek Environmental Consultants, Environmental Resource Management, LUC and RA NAS Institute of Botany, RA NAS Scientific Center of Zoology and Hydrology.

All the environmental risks that have been raised were identified, properly assessed and appropriate mitigation measures applied as part of the Project's EIA and ESIA. The ESIA for the project (which includes all community-linked issues) was developed by a reputable international consultancy (Wardell Armstrong), and reviewed by an independent consultant (Knight Piesold) and the IFC. The review concluded that the ESIA complies with the IFC's Performance Standards.

Lydian Armenia has provided a comprehensive report specifically regarding the Bern Convention questions to the Ministry of Environment in 2019. There has been no indication that the Bern Convention should be applied to this project.

Lydian Armenia has followed all the requirements of the Armenian legislation and international best standards including the requirements of the IFC and EBRD. The company has held over 15 public hearings, 20 public consultations, and 200 meetings with an established community liaison process.

The company also involved community members in the participatory monitoring process of the Amulsar Project and established an Independent Advisory Panel (IAP) which includes international and local leading experts representing biodiversity, public health, water, cyanide, and



environmental management sectors. The IAP produced and disclosed its first report in May 2019. According to the IAP, the company's work on biodiversity during the Environmental Impact Assessment (EIA) process, its engagement with local communities, and its commitment to transparency, demonstrated a strong commitment to sustainability and mining best practice.

Sincerely,

Michael Spencer

Managing Director

Osisko Bermuda Limited