

RMG – COMPANY PROFILE

Exploration of gold-copper-barite polymetallic ore deposits in the Bolnisi region started in the 40s of the last century. The construction of Madneuli complex, one of the largest non-ferrous metals plant, began in 1959. Starting its operation in 1975, the complex was used for extracting copper, barite, gold- and silver-containing quartzites and polymetallic ores, initial processing of extracted copper and barite ores, enriching and selling products. The extraction of barite was stopped in 1990. In 1994, Quartzite LLC was created which started gold and silver recovery from stockpiled gold-containing quartzite ores, using heap-leaching method. Because of privatization of Madneuli and Quartzite in 2005, the owner of the enterprises became Stanton Equities Corporation, registered in the British Virgin Islands (offshore zone), a subsidiary of the Russian company Promishlenniye Investori. In December 2007, Promishlenniye Investori sold its shares in Madneuli and Kvartziti to GeoProMining, owned by Siman Povarenkin, a chairman of the board of directors and co-owner of Promishlenniye Investori. Since 2012, a Russian company Capital Group has become the owner of the enterprises. In 2012, JSC Madneuli changed its name to RMG Copper, and Quartzite LLC - to RMG Gold.

RMG GOLD

According to the Public Registry of Entrepreneurial and Non-Entrepreneurial (Non-Commercial) Legal Entities of Georgia, until June 2019, RMG Gold LLC has been owned by private Rich Metals Group B.V., registered in the Netherlands (96.21% of shares) and JSC RMG Copper (3.79% of shares). According to amendments made to the registration documents on June 10, 2019, due to liquidation of Rich Metals Group B.V., its 96.21% shareholder became Mining Investments LLC (I/C 404415824), a sole stockholder of the liquidated company.

Mining Investment LLC has been brought to the attention of the public first in February 2012, when the company became the sole bidder for the auction held by the Agency of Natural Resources. A 27-year license for exploration and extraction of gold, copper and other precious minerals in Shida Kartli region was auctioned. Two weeks before the auction, on February 13, 2012, Mining Investments LLC was registered in Tbilisi. The director and sole owner of Mining Investments LLC was Alvidas Brusokas, a Lithuanian citizen¹.

From 2015, Green Alternative issues periodic reports on availability of information on the state of environment in Georgia. During the analysis of availability of information of the state of environment, we study accessibility of information on so-called "large-scale pollutants" and prepare company profiles of four enterprises that are singled out in terms of the scope of activities and impacts on the environment and human health.

These companies are:

- (1) RMG – Rich Metals Group;
- (2) Georgian Manganese;
- (3) Saknakhshiri; and
- (4) HeidelbergCement.

This document reflects the availability of information on RMG.

¹ [Mining Auction Fails to Attract Major Investors, Transparency International Georgia, March 1, 2012](#)

The Supervisory Board of RMG Gold has not been changed, and its members are: Russian billionaires [Dmitry Troitsky](#) and [Dmitry Korzhhev](#) and Irina Nikiforova, also a Russian citizen. CEO of the company is Tornike Lipartia.

RMG Gold holds a license to exploit the famous Sakdrisi deposit.

Individual annual reports of RMG Gold LLC for [2017](#)² and [2018](#) are published on the website of the Service for Accounting, Reporting and Audit Supervision (SARAS).

According to the report of 2018, “The Company’s last external ore reserve assessment for the Sakdrisi deposit was performed in May 2013 by Snowden Mining Industry Consultants and were estimated at 10,400 thousand tonnes for the Sakdrisi deposit. The Company itself conducts a detailed internal assessment on ore reserves taking into consideration current information based on extracted rock, which is more precise than samplings of drill holes and other openings. The estimated quantity of reserves calculated by the Company’s geologists were: Sakdrisi deposit - 2,290 thousand tones (76 thousand ounces) and Madneuli tertiary processing (note 17) – 19,200 tones (1654 thousand ounces). In addition the Company estimated 1,648 thousand tones (24 thousand ounces) barite ore fit for processing”.

According to the same report, “The Company started the heap leach process on the Sakdrisi territory in 2014 which is on-going in 2017. On Madneuli heap leaches, the Company performed the secondary processing of ore and started the tertiary restacking of materials in 2017. Due to the commencement of tertiary processing of ore materials on Madneuli area and the extension of mine area on Sakdrisi deposit, the Company extended its plans of mining operations from 2018 till 2020 for Madneuli and from 2020 till 2025 for Sakdrisi. For Sakdrisi deposit, there is an expectation that crushed material from the older pads will also be restacked as it was occurred in Madneuli deposit. Also planning is currently in place for accessing an ore extension at the Sakdrisi 5 pit which will enable the lengthening of the mining operations at Sakdrisi area. Gold grades are assessed by the Company’s geologists. Average gold grade for Sakdrisi heaps is 1.03 grams per ton (g/t), for restacked ore in Madneuli area is 0.25 g/t and for barite ore is 0.49 g/t. Gold minimum recovery rate is assessed by the Company’s geologists at approximately 61% for Sakdrisi heaps, 15% for restacked ore and 50% for barite ore.

It is noteworthy that the financial report also covers environmental issues such as impact on soil, air, water, biodiversity, sustainability of dump slopes, waste management.

RMG COPPER

Information about owners of JSC RMG Copper is not presented in the registry of entrepreneurial and non-entrepreneurial legal entities since the Georgian legislation does not require publicity of information about the shareholders of the Joint Stock Companies. However, after enactment of requirements of Law of Georgia on Accounting, Reporting and Auditing in 2016, RMG Copper has also been subject to the requirement of public financial reporting and it can be said that financial statement 2017 of JSC RMG Copper (unfortunately, the only one) that is

² The 2017 financial statement is also available in [English](#)

available on SARAS website, covers most of the information about the company owners that has so far been made publicly available.

According to the [JSC RMG Copper Financial Statement 2017](#), the company has two subsidiaries: Belaz Kavkaz Trans Service Ltd, Trans Petg Mzidi Ltd, where it owns 50% of shares. As of December 31, 2017, and 2016, 99.6% of the company was owned by Rich Metals Group B.V. (Netherlands), and the final owners were Suncort Enterprises Limited and Ticola Holdings Limited, registered in the British Virgin Islands. As of December 31, 2017, and 2016, the Company's ultimate controlling party was two individuals - Dimitri Troitsky and Dimitri Korzhev, who are entitled to conduct the Company's operations at their discretion and for their own benefit.

We can assume that due to liquidation of Rich Metals Group B.V. in 2019, 96.21% shareholder of JSC RMG Copper has also become Mining Investment LLC (JSC 404415824), a sole shareholder of the liquidated company.

The financial statement also says that "the company holds a licence for exploration, extraction and recycling of resources from the Madneuli deposit in Bolnisi until 2041. Main activity of the company is the production and sale of gold-copper concentrate. The accompanying product of the company's activity in the production and sale of cemented gold-copper concentrate. The company's technological process is to extract gold and copper from the rocks through the technological process of flotation. Flotation is a process through which the concentrate or fraction containing the most gold and copper is separated in finely ground rocks using water and reagents (mainly by lime). Through this process, in 2017, 2.4 million tons of ore were processed, with copper content of 0.54% and gold content of 0.69 g/t. The concentrate produced amounted to 59,562 tons with average copper content of 15.76% and gold content of 18.18 g/t. Copper and gold ore extraction coefficients were 72.31% and 65.38%, respectively. With flotation technology only certain types of so-called sulphide deposits can be recycled, thus the company gets proper ore from its own so-called Madneuli quarry as well as Sakdrisi deposit of RMG Gold Ltd. In 2018-2025, it is planned to extract 13.3 million tons of ore from the Madneuli quarry and purchase 10.6 million tons of ore from the RMG Gold LLC within the same period. From 2019, the company plans to re-process the ore produced by Auramine LLC as well."

The financial statement of RMG Copper also covers environmental issues such as impact on atmospheric air, water, biodiversity and their monitoring, noise and waste management.

MINING INVESTMENTS

Mining Investment LLC (I/C 404415824), as mentioned above, is a company registered by Alvidas Brusokas, a Lithuanian citizen, in 2012. Over the years, various types of changes have been made within the company. In 2015, Mining Investments LLC merged with Mining Developments - Georgia³ LLC, owned by the same company (I/C

³ Upon its registration in 2012, the owner of the company was SPECIMAX Co, registered in Cyprus. Its director was Solomon Tsabadze. The company itself owned Mineral Resources Management Ltd (I/C 404944600), registered on 15/05/2012, Director: Zurab Kutelia. In 2013, the company merged with the owner.

404944414). CEOs of the company at various times were Russian citizen Yuri Pilipenko, Vakhtang Faresishvili⁴ who has been [Deputy Head of Investigation Service of the Ministry of Finance of Georgia](#)⁵ since December 11, 2018, and Solomon Tsabadze.

As of today, Pemtilon Holdings Limited based in Cyprus owns 100% shares of the company. Company Director is Alexander Chernih, a Russian citizen. Supervisory Board members are Russian citizen Dmitry Troitsky, Kakhaber Mchedlishvili and Alexander Chernih.

CAUCASIAN MINING GROUP

[Caucasian Mining Group](#) LLC (I/D 404908775) which, since 2011 (in fact, upon its registration), holds the exploration and extraction licence⁶ taken away from JSC Madneuli is closely affiliated with these companies. The owner of Caucasus Mining Group is also Pamtilon Holdings Limited, a Cyprus-registered company. Director General of Caucasus Mountain Group is Jondo Shubitidze. Again, the Supervisory Board members are Dmitri Korzhev, a Russian citizen, Kakhaber Mchedlishvili and Irina Nikiforova, also a Russian citizen.

Caucasian Mining Group LLC owns 100% of shares of LLC RMG Auramine (404908775) and 100% of shares of Georgian Gold Company (405205987) whose Director General is Tornike Lipartia. Moreover, Caucasian Mining Group, together with [Georgian Mining Corporation](#), registered in the British Virgin Islands, owns (50% of shares) JSC Georgian Copper and Gold (I/C 405117494), registered in Georgia.

Until November 18, 2016, Kakhaber Kuchava, current Deputy Chairman of the Parliament of Georgia and former Chairman of the Committee on Environmental Protection and Natural Resources of the Parliament, served as the General Director of JSC Georgian Copper and Gold. Kakhaber Kuchava owned 33% of shares of Umbrella Enterprises LLC (I/C 404879798) until November 15, 2016 (shares were bought by Irakli Kuchava for 100 GEL); from 2011 to October 11, 2016, he was a director of JSC Carlton GEORGIA (afterwards JSC ZOPKHITO GOLD, now JSC Caucasian Minerals) founded by Umbrella Enterprises LLC, which in 2011 obtained a 30-year licence for exploring and extracting non-ferrous, noble, rare metals and barite in Oni region for 990 000 GEL.

Madneuli and Quartzite were among the first enterprises where the government started implementing measures for prevention of corruption and improvement of management since the 2003 Rose Revolution. Today, no one talks about the corruption in these enterprises, however, the exclusive “benevolence” and loyal attitude of state authorities to these companies raises a suspicion of elite corruption. For instance, it is enough to mention the fact of removing the status of a monument of national importance for Sakdrisi-Kachaghiani ancient gold mine in the

⁴ In 2014 – 2017, was CEO and Member of Supervisory Board at Mining Investments LLC (RMG Group). In the same years, assumed the same position Ltd RMG Gold, JSC RMG Copper and Caucasian Mining Group LLC

⁵ It is noteworthy that from 6.12.2018 [Soso Ramishvili assumes a position of the Head of Investigation Service of the Ministry of Finance of Georgia](#), who was Deputy Executive Director of Ltd RMG Gold and JSC RMG Copper within the period of 21.02.2017-13.03.2018.

⁶ The licence is issued for exploration and extraction of non-ferrous, noble, rare metals and barite in Bolnisi, Marneuli, Dmanisi, Tsalka and Tetrtskaro municipalities. The licence is issued on 187 823, 59 ha area, which is 2.7% of the total area of the country.

world and giving the company a permit to explode the monument⁷. However, recently we have witnessed yet another manifestation of elite corruption.

LEGALIZED OFFENCES

According to Georgian legislation, activities, that may have a significant impact on the environment, human life and/or health, may be carried out only on the basis of prior consent (environmental permit until 2018, and so-called environmental decision - after 2018) by the competent authority - Ministry of Environmental Protection and Agriculture. However, fulfilment of this requirement is not always mandatory for the companies within the RMG Group; and their non-fulfilment does not create any problems. If the violation is revealed, there will always be a way to legalize it, even if it is illegal.

On March 28, 2019, the Ministry of Environmental Protection and Agriculture of Georgia published [announcement](#) on its website on public review of scoping report on reservoir-sedimentation project on the territory of Bektakari gold-polymetallic ore deposits of RMG Auramine LLC in Bolnisi Municipality⁸. According to the enclosed documents, on March 21, 2019, Tornike Lipartia, General Director of RMG Auramine LLC, addressed the Ministry of Environmental Protection and Agriculture with a letter saying that the company **planned** to arrange a reservoir-sedimentation of 17800 m³ volume in the vicinity of Bektakari gold-polymetallic deposits and submitted a scoping report for reviewing it and obtaining a scoping opinion.

On April 12, 2019, public review of scoping report **on planned activities** was held in the village of Bertakari, also attended by Green Alternative representatives. After the public review, the project site was inspected at the request of Green Alternative. As a result of field visit, it became clear that RMG Auramine not planned but had already completed its construction. Two sedimentation basins had already been arranged on the project area. We immediately informed the Minister of this fact and requested an investigation of the fact of constructing the basin without proper permit and obtaining scoping opinion in a fraudulent way. Deputy Minister Nino Tandilashvili sent a complaint of Green Alternative to the Environmental Supervision Department only one week later, on April 23, 2019, requesting its examination within its competence.

It is noteworthy that files of administrative proceedings requested by us at a later stage do not contain any document that would confirm the fact of notification to the Environmental Supervision Department of the fact of law violation by an employee of the Environmental Assessment Department under the Ministry (who was in charge of the review) or his/her supervisor.

⁷ For detailed information, please, see the report of Green Alternative “Madneuli above the Law” (2013) and survey “Natural resources management and factors contributing to elite corruption” (2013) at www.greenalt.org and survey of Georgian Young Lawyers’ Association “Sakdrisi-Kachaghiani – Destruction of behalf of Law” (2015), www.gyla.ge

⁸ According to the Environmental Assessment Code, scoping is a procedure to determine the list of information to be obtained and studied for an EIA environmental assessment, and the means to include this information in the EIA report environmental assessment report;

Since the Ministry has not responded to our complaint, on May 10, 2019, we requested information on measures taken by the Ministry to verify information on the fact of law violation and investigate it. In response to our request, we received a letter only on July 3, 2019, which stated:

1. “On-site inspection revealed that no fertile soil layer has been removed and stockpiled during the land excavation, namely, in the process of placing empty rocks resulted from construction of tunnel portal entrance, sedimentation basin and tunnels, building access roads to construction site, arranging parking area adjacent to the construction site and building other auxiliary facilities by RMG Auramine LLC, in accordance with requirements of Article 3 (2) and (5), as well as Paragraph 11 of Government Decree #424 dated December 31, 2013, on Approval of Technical Regulations on Removal, Storage, Use, and Recultivation of Fertile Soil Layer;
2. As stated in a letter #185054 of the National Agency of Public Registry of the Ministry of Justice of May 29, 2019, the ownership right over the adjacent area to the construction site (immovable property) where parking has been arranged (500 m² area) has not been registered. It is agricultural land of arable category; accordingly, the company uses it inappropriately. Therefore, it was established that RMG Auramine LLC has committed a violation under Articles 51, 512 and 532 of the Code of Administrative Offenses of Georgia. Based on it, protocols of administrative offenses #051570 and #051571 were drawn up on June 18, 2019. The amount of damage to the environment caused by the degradation of land (soil) was also calculated, which amounted to 1105.74 GEL. The protocols with its enclosed materials were submitted to Bolnisi District Court by letters of the Department #DES91900038224 and #DES41900038229 of June 27, 2019.
3. In accordance with Article 14 of the Waste Management Code, RMG Auramine LLC was required to develop a waste management plan of the company and submit it to the Ministry for approval, but the company failed to do so.
4. Furthermore, in accordance with Article 29 of the Waste Management Code, RMG Auramine LLC was obliged, pursuant to Order #2-11 of the Minister of Environment Protection and Agriculture of Georgia, dated January 9, 2018, to submit information on waste produced in 2018 in electronic form through <http://waste.moe.gov.ge> until March 1, 2019, however, the company failed to do so. Consequently, it was held that RMG Auramine LLC violated Article 43 (paragraph 2) and Article 44 of the Waste Management Code. As a result, on June 18, 2019, a protocol #051573 on an administrative offense was drawn up which, together with other enclosed materials, was submitted to Tbilisi City Court by letter #DES01900038144 of the Department, dated June 27, 2019.
5. It was also revealed that RMG Auramine LLC has arranged a 17,800 m³ sedimentation basin adjacent to the village of Bertakari in Bolnisi Municipality, though it did not have an environmental decision as envisaged by the Environmental Assessment Code. Thus, it was established that RMG Auramine LLC committed an offense provided for in Article 797 (1) of the Code of Administrative Offenses of Georgia. Accordingly, on June 18, 2019, a protocol on an administrative offense #051572 was drawn up which, together with other enclosed materials, was submitted to Bolnisi District Court by letter #DES11900038172 of the Department, dated June 27, 2019.

Green Alternative further requested information on measures taken by the Ministry against RMG Auramine LLC for providing false information to both the Ministry and the public and attempting to obtain fraudulently environmental decision for reservoir-sedimentation that had already been arranged on the territory adjacent to the Bektakari ore

deposit. According to the Ministry, “the Environmental Supervision Department had reacted against violations committed by RMG Auramine LLC and submitted respective protocols to the appropriate court for consideration.”

Since it was obvious from the response of the Ministry of Environmental Protection and Agriculture that its staff failed to take any measures to react against the fact of obtaining permit cheating the public and the public institution by the company, Green Alternative addressed the Department of Internal Audit with a request to examine official negligence and/or corruption deal. We received a response from Jemal Donadze, Deputy Head of the Internal Audit Department, explaining that the main function of the Environmental Supervision Department of the Ministry is to respond to environmental violations.

Mr. Donadze has also clarified that in case we assumed that there had been any other violation, we could apply to the appropriate authority.

It should also be noted that, according to the Decree #61 of the Government of Georgia dated February 17, 2015, on Rules for Carrying out State Control by Environmental Supervision Department under the Ministry of Environmental Protection and Agriculture, if alleged signs of criminal offenses are revealed,

an inspection protocol and/or an administrative offense protocol and other documents shall be submitted to the relevant investigative bodies for further action. If the inspection reveals an alleged administrative offense, which does not fall within the competence of the Department, and if the Department is aware which administrative body is responsible for that, relevant information together with case files shall be submitted to relevant administrative body for further action. In the given case, the Environmental Supervision Department **failed to do so**.

Before we tried to convince the Internal Audit Department of the Ministry to investigate the issue, and then we asked Kakhaber Kuchava, former Chairman of the Committee on Environmental Protection and Natural Resources of Parliament, to examine the activities of the Ministry within the framework of parliamentary supervision, the Ministry of Environmental Protection and Agriculture published on its website an Order of the Minister on issuing a scoping opinion for the design of arranging 17,800 m³ volume reservoir-sedimentation on the territory adjacent to Bektakari gold-polymetallic deposit of RMG Auramine LLC. According to the Order, based on Paragraph 9 (9.9) of Annex II of the Environmental Assessment Code, a scoping opinion was issued for the design of arranging 17,800 m³ volume reservoir-sedimentation on the territory adjacent to Bektakari gold-polymetallic deposit of RMG Auramine LLC.

The Ministry of Environmental Protection and Agriculture of Georgia has done nothing to prevent the attempt of RMG Auramine to deceive the public and the Ministry itself.

The Department of Environmental Supervision is a state sub-agency within the Ministry's governance which is primarily responsible to react environmental violations.

The Internal Audit Department of the Ministry has examined the aforementioned case files and, in this respect, we would like to emphasize that the **Environmental Supervision Department** has reacted within the framework of applicable law, and forwarded them to Bolnisi District Court for legal evaluation and further proceedings. Accordingly, the argument given in your letter that nothing had been done to lay the responsibility upon the company is without foundation.

Instead, the Ministry has not only failed to prevent but also even encouraged such an action; by breaching the law itself, issued a scoping opinion on current activities. It is noteworthy that the scoping opinion to be issued by the Ministry is mandatory when preparing an Environmental Impact Assessment Report for the business operator - however, how RMG Auramine LLC should prepare an Environmental Impact Assessment on current activity that can only be carried out on planned activity - is unclear.

Certainly, Green Alternative has appealed against the Minister's completely unjustified and unlawful decision and a criminal decision on its merits⁹.

It is noteworthy that the situation was identical in 2014 in respect with construction of the heap leach platforms by RMG Gold. At first, RMG Gold have built the heap leach platforms and then had a public review of the documents required for obtaining an environmental impact permit for their construction and then submitted to the Ministry to receive a permit. Thanks to the student movement Green Fist¹⁰, the public became aware of the company's attempts to obtain a permit deceiving the public and the Ministry, however this did not appear to lead to any actions from the public bodies. Instead, the Ministry of Environment and Natural Resources Protection provided the company with the opportunity to call back the submitted application based on the need for technical changes; and later, granted the right to carry out its current activities. Thus, obtaining the right to carry out activities in violation of the law is already a well-known method for RMG Group companies, and public authorities are eagerly promoting this practice.

ENVIRONMENTAL IMPACT OF ENTERPRISES

In terms of access to information on the environmental impact of the enterprises, nothing has been changed within a year. The information obtained and processed by us at the end of 2018 is still relevant and is available in the [Company Profile 2018](#).

The company [website](#) still does not provide information of the environmental condition, on the damage caused to the environment resulted from its activities and implemented and/or ongoing measures for environmental impact reduction, threats to local natural and social environment due to the company activities and/or planned and implemented measures to prevent these threats.

⁹ The lawsuit was filed before Tbilisi City Court on December 6, 2019

¹⁰ [Green Fist appeals to the Government and releases new photos of Sakdrisi, January 13, 2014, Liberali](#)

MINING LICENCES

Mining licences for companies within RMG Group - extract from the Mining Licence Register provided by the National Agency of Mines¹¹.

Licence No	Name of the facility	License holder	Term of registration and validity	Resource volume	Area	Transfer
10	Geological exploration and further extraction of known ore minerals of Bolnisi Group (Bolnisi, Dmanisi and Marneuli districts)	LLC RMG Gold	07.04.1994 30.12.1996 20 years Term extended 01.01.15 Term extended 01.01.20		9.0 ha	Trans-Georgian Resources Ltd was transferred Order #1-1/291 11.02.09 Licence issued to Quartzite LLC was transferred Order #13/544 30.10.12 Order #245 07.04.14 Order #478/l 31.12.14
11	Integrated processing of Madneuli gold-copper-barite-polymetallic deposit in Bolnisi district	JSC RMG Copper	12.04.94 23.07.97 20 years	1) Copper ore-5070000 (Cu-0.35%, Au-0.41 g/t, Ag-1.68 g/t) 2) Gold containing secondary quartzite-2713200 (Au-1.02 g to t, Ag-5.15 g/t)	421,45 ha	Amendment to Order #13/15, 14.05.12. Licence issued to JSC Madneuli has been transferred Order #13/546, 30.10.12
1000874	Exploration and extraction of minerals (non-ferrous, noble, rare metals and barite) in Bolnisi municipality	JSC RMG Copper	30.10.12 12.04.14		26.28 ha	License #1000281 issued to JSC Madneuli was transferred
1002122	Exploration and extraction of minerals (non-ferrous, noble, rare metals and barite) in Bolnisi and Dmanisi municipalities	LLC RMG Gold	25.11.14 02.01.42 License became effective 01.01.15		193.76 ha	Part of license #1000577 transferred by Mining Investments LLC Amendment to license #1001028 Amendment to license #1001539 issued to Mining Investments Gold LLC (merger)
1003161	Exploration and extraction of minerals (non-ferrous, noble, rare metals and barite) in Bolnisi, Marneuli, Dmanisi, Tsalka and Tetrtskaro municipalities	JSC Georgian Copper and Gold	04.12.15 13.10.41	Exploration period 72 months (1 year, 10 months, 8 days)	86 107.669 ha	Amendment to Order #414, 23.10.13 (exploration period extended) Order #1784/10.11.15 Part of license #1000226 was transferred by Caucasus Mining Group LLC
1004034	Extraction of minerals of Bektakari gold-	LLC RMG Auramine	19.10.16 13.10.41	Bektakari deposit: gold - 11987.87kg, silver – 108712 kg,	Mining - 345,7939 ha	Amendment to Order #414 23.10.13

¹¹ [Mining Licence Register as of December 4, 2019](#). The document is available upon request at the National Agency for Mines.

Licence No	Name of the facility	License holder	Term of registration and validity	Resource volume	Area	Transfer
	polymetallic deposit in Bolnisi municipality			lead -27448 tons, zinc -57528 tons	land - 309,849 ha	Amendment to Order #1784/10.11.15 (exploration period extended) Part of license #1000226 transferred to JSC Georgian Copper and Gold Amendment to License #1003160 (extraction) Part of license #1003998 transferred by Caucasus Mining Group LLC
1004600	Extraction of minerals from Bneli Khevi gold-polymetallic deposit in Tetrtskaro municipality	LLC Georgian Gold Company	31.05.17 13.10.41	North-east pit of deposit - gold 1635.07 kg, silver - 8503.79 kg	Mining - 239.4021 ha, land - 504.6677 ha	Amendment to Order# 414 23.10.13. Amendment to Order #1784/10.11.15 (exploration period extended) Part of license #1000226 transferred to JSC Georgian Copper & Gold Amendment to license #1003160 (extraction) Part of license #1003998 transferred to RMG Auramine LLC Amendment to license #1004035 (stocks approved) Part of license #1004318 transferred by Caucasus Mining Group LLC
1005299	Extraction of Didi Dmanisi secondary quartzite in Dmanisi municipality	LLC RMG Gold	07.03.18 21.12.25	minimum 90000 t/year	10.0 ha	Mining license #0673 fully transferred by Construction Materials LLC
1005314	Exploration and extraction of minerals (non-ferrous, noble, rare metals and barite) in Bolnisi, Marneuli, Dmanisi, Tsalka and Tetrtskaro municipalities	Caucasus Mining Group LLC	14.03.18 13.10.41	David-Gareji gold-barite-polymetallic ore: silver -108.93 t (108930 kg), barite - 895191.59 t, exploration period on other districts - 120 months	100865.45 94 ha	Amendment, Order #414 23.10.13 Amendment (exploration period extended), Order #1784 /10.11.15 Part of License #1000226 transferred to JSC Georgian Copper & Gold Amendment to license #1003160 (extraction) Part of license #1003998 (stocks approved) transferred to RMG Auramine LLC

Licence No	Name of the facility	License holder	Term of registration and validity	Resource volume	Area	Transfer
						Amendment to license #1004035 (stocks approved) Part of license #1004318 transferred to Georgian Gold Company Ltd Amendment to license #1004601 (exploration period extended)-
1005456	Exploration and extraction of minerals (non-ferrous, noble, rare metals and barite) in Bolnisi municipality	JSC RMG Copper	10.05.18 16.04.41	Gold - 1804.6912 kg; silver-64 900.344 kg; copper -26815.06 t; gold - 1691.16kg	1035.5 ha	Part of license #1000577 transferred by Mining Investments LLC to JSC RMG Copper until July 12, 2014 Amendment to license #1001030 issued to Mining Investments Copper Ltd Amendment to license #1002121 (stocks approved) Amendment to license #1004727 (stocks approved)

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