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March 5, 2018

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

Dear Ms. Skybenko Dear Ms. Dobson,

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

As an investor in the mining sector, Orion Mine Finance (Orion) is committed to including ESG matters into its investment processes and ownership activities. As a condition of our investment, Orion has required that Lydian comply with EBRD and IFC standards.

Orion understands the risks associated with mining and therefore works with its portfolio companies throughout the mine's development and thereafter to offset ESG-related risks and maximize safe conditions. Lydian has committed to Orion that it will comply with best practices throughout construction, operation and closure of its mine. Orion believes that Lydian's management team has optimized the project's design to meet with best industry practice in this regard. We have and will continue to be engaged with Amulsar's environmental and social teams on a regular basis. Lydian continuously offers transparency to all its stakeholders. We would therefore direct the Business & Human Rights Resource Centre to review the Amulsar website for updates on social and environmental activities at: http://www.lydianarmenia.am/en.

Sincerely,

Kirsten Wolf Chief Risk Officer Orion Resource Partners 1211 Avenue of the Americas Suite 3000 New York, NY USA 10580