

**IN THE MATTER OF AN ARBITRATION UNDER THE RULES OF  
ARBITRATION OF THE INTERNATIONAL CENTRE FOR THE SETTLEMENT  
OF INVESTMENT DISPUTES**

**ICSID CASE NO: ARB/14/22**

**B E T W E E N:**

**BSG Resources Limited**

**Claimant**

**and**

**The Republic of Guinea**

**Respondent**

---

**CLAIMANT'S INDEX OF FACTUAL EXHIBITS**

---

<b>Exhibit No.</b>	<b>Document</b>	<b>Date</b>
<b>C-0001</b>	BSGR's Chronicle of Events and Overview of BSGR's Iron Ore Investment in Guinea in Response to the Technical Committee	26 December 2012
<b>C-0002</b>	BSGR Presentation	May 2005
<b>C-0003</b>	Letter from Cesare Morelli to Marc Struik	15 June 2015
<b>C-0004</b>	Decree No. 2006/706/MMG/SGG	6 February 2006
<b>C-0005</b>	Decree No. 2006/707/MMG/SGG	6 February 2006
<b>C-0006</b>	██	████████
<b>C-0007</b>	██	████████
<b>C-0008</b>	████████████████████████████████████	████████
<b>C-0009</b>	Memorandum of Understanding between Republic of Guinea and BSGR Guinea	20 February 2006

<b>C-0010</b>	Decree No. 2008/4980/MMG/SGG	9 December 2008
<b>C-0011</b>	████████████████████	████████
<b>C-0012</b>	Decree No. A 2009/1327/PR/MMEH/SGG	10 June 2009
<b>C-0013</b>	Certificate of validity of Permit No. 2008/I-4980/MMG/SGG	5 May 2009
<b>C-0014</b>	Zogota Feasibility Study	October 2009
<b>C-0015</b>	Decree No. A/2009/3466/PRG/SGG/MMEH	1 December 2009
<b>C-0016</b>	Ordinance No. 003/PRG/CNDD/SGG/2010	19 March 2010
<b>C-0017</b>	Presidential Decree No. D2010/024/PRG/CNDD/SGG	19 March 2010
<b>C-0018</b>	████████████████████	████████
<b>C-0019</b>	████████████████████	████████
<b>C-0020</b>	████████████████████	████████
<b>C-0021</b>	████████████████████	████████
<b>C-0022</b>	████████████████████	████████
<b>C-0023</b>	Letter from Minister of Mines Mahmoud Thiam to E Ledsham of Vale	19 March 2010
<b>C-0024</b>	Letter from BSGR to Minister of Mines Mahmoud Thiam with endorsement from minister of mines Mahmoud Thiam	16 April 2010
<b>C-0025</b>	Registration of change of name from BSGR Guinea to VBG Vale BSGR Guinea	14 June 2010
<b>C-0026</b>	Order of Service No.0658/MMH/CAB issued by Mahmoud Thiam	2 July 2010
<b>C-0027</b>	Order of Service Re Reconstruction of the Conakry-Kankan railroad issued by Mahmoud Thiam	2 July 2010
<b>C-0028</b>	Cramer Judicial Review Witness Statement	25 November 2014
<b>C-0029</b>	Letter from BSGR to the Ministry of Mines	25 October 2010
<b>C-0030</b>	Letter from Ministry of Mines to BSGR	1 November 2010
<b>C-0031</b>	Letter from Ministry of Mines Mahmoud Thiam and Minister of Transportation Mathurin Bangoura to BSGR Guinea	22 November 2010

<b>C-0032</b>	Letter from VBG Vale BSGR Guinea to Ministry of Mines	14 September 2011
<b>C-0033</b>	BBC, <i>"Guinea's Alpha Conde confirmed presidential poll winner"</i>	3 December 2010
<b>C-0034</b>	Email from Daniel Pollak to Asher Avidan	9 February 2011
<b>C-0035</b>	Policy Information for the Guinean Mining Sector	10 February 2011
<b>C-0036</b>	Letter from BSGR to the President of Guinea	14 March 2011
<b>C-0037</b>	Media Part <i>"Guinea, mining paradise that makes the world's mouth water"</i> )	7 October 2013
<b>C-0038</b>	Financial Times, <i>"Guinea to review mining licences"</i>	4 March 2011
<b>C-0039</b>	Letter from Minister of Transport El Hadj Tidiane Traoré to BSGR Guinea	8 April 2011
<b>C-0040</b>	Letter to the President of Guinea regarding Memorandum on joint enterprise between Vale and BSGR	20 April 2011
<b>C-0041</b>	Rio Tinto Press Release <i>"Rio Tinto and Government of Guinea sign new agreement for Simandou iron ore project"</i>	22 April 2011
<b>C-0042</b>	Letter from Ministry of Mines to BSGR Guinea	4 October 2011
<b>C-0043</b>	Letter from Ministry of Mines to BSGR	31 October 2011
<b>C-0044</b>	Letter from Minister of Mines to Vale BSGR	17 November 2011
<b>C-0045</b>	Letter from BSGR to the Minister of Mines	28 November 2011
<b>C-0046</b>	Letter from Minister of Mines Mohamed Fofana to BSGR	19 January 2012
<b>C-0047</b>	Letter from BSGR to Mohamed Fofana	20 January 2012
<b>C-0048</b>	Letter from Veil Jourde to the Minister of Mines	3 February 2012
<b>C-0049</b>	Letter from BSGR to the President of Guinea	28 February 2012
<b>C-0050</b>	Letter from Minister of Mines Mohamed Fofana to BSGR	20 March 2012
<b>C-0051</b>	Decree D/2012/041/PRG/SGG issued by Alpha Condé	26 March 2012
<b>C-0052</b>	Decree D/2012/045/PRG/SGG issued by Alpha Condé	29 March 2012
<b>C-0053</b>	Letter from Ministry of Mines to Ricardo Saad	11 October 2012
<b>C-0054</b>	Letter from the Technical Committee to VBG-Vale BSGR	30 October 2012

	Guinea (the "Allegations Letter")	
<b>C-0055</b>	Letter from BSGR to the Technical Committee	26 December 2012
<b>C-0056</b>	Bloomberg, " <i>BSG Role in Guinea's Vale Venture Faces State Review</i> "	8 February 2012
<b>C-0057</b>	James Libson Witness Statement in support of BSGR's Judicial Review Application	26 November 2014
<b>C-0058</b>	Transcript of Chatham House Q&A Session " <i>Guinea in Transition: Reform, Resources and Regional Relations</i> "	14 June 2013
<b>C-0059</b>	Transcript of Channel 4 news broadcast of " <i>Guinea Corruption and diamonds</i> "	17 June 2013
<b>C-0060</b>	Financial Times, " <i>Guinea corruption probe advances but wait for Simandou goes on</i> "	21 October 2013
<b>C-0061</b>	Transcript of interview with Alpha Condé	4 November 2013
<b>C-0062</b>	Africa Mining Intelligence, " <i>US RusAl to sign \$832 million check for Conakry</i> "	26 March 2013
<b>C-0063</b>	Sable Mining Africa, " <i>Focusing on Iron Ore. Sable Mining Report and Accounts</i> "	2013/2014
<b>C-0064</b>	Technical Committee's recommendation concerning the titles and mining agreement held by the company BSGR Guinea (" <i>Technical Report</i> ")	21 March 2014
<b>C-0065</b>	Decree D/2014/98/PRG/SGG issued by Alpha Conde	17 April 2014
<b>C-0066</b>	Decree A/2014/1204/PRG/SGG issued by Kerfalla Yansane	18 April 2014
<b>C-0067</b>	Decree A/2014/1206/PRG/SGG issued by Kerfalla Yansane	23 April 2014
<b>C-0068</b>	Letter from Ministry of Mines to VBG Vale BSGR Guinea	24 April 2014
<b>C-0069</b>	Base Convention	16 December 2009
<b>C-0070</b>	Daniel Labetoulle and Denys de Bechillon Legal Consultation	9 December 2012
<b>C-0071</b>	Letter from Technical Committee to BSGR Guinea	7 May 2013
<b>C-0072</b>	Letter from Skadden Arps to Technical Committee	4 June 2013
<b>C-0073</b>	Letter from Technical Committee to BSGR Guinea	4 December 2013

<b>C-0074</b>	Letter from Skadden Arps to Technical Committee	8 December 2013
<b>C-0075</b>	Letter from Skadden Arps to Technical Committee	26 February 2014
<b>C-0076</b>	████████████████████	██████████
<b>C-0077</b>	████████████████████	██████████
<b>C-0078</b>	████████████████████	██████████
<b>C-0079</b>	████████████████████	██████████
<b>C-0080</b>	██████████	██████████
<b>C-0081</b>	████████████████████	██████████
<b>C-0082</b>	██████████	████
<b>C-0083</b>	Letter from BSGR to Government of Guinea	15 March 2013
<b>C-0084</b>	Share Purchase Agreement between BSGR Steel and Pentler	24 March 2008
<b>C-0085</b>	Statement of Mamadie Touré	27 April 2012
<b>C-0086</b>	Affidavit of Mamadie Touré	2 December 2013
<b>C-0087</b>	Benjamin Steinmetz passports and flight documents	Undated
<b>C-0088</b>	Letter from BSGR to the Minister of Mines	24 June 2006
<b>C-0089</b>	BSGR Presentation to Ministry of Mines	19 September 2006
<b>C-0090</b>	FUGRO Airborne Surveys Technical Report	6 September 2007
<b>C-0091</b>	Photographs of the local custom "Kola" during bauxite meetings in August 2006	Undated
<b>C-0092</b>	Decree No. D/2008/041/PRG/SGG	28 July 2008
<b>C-0093</b>	Letter from Minister Secretary General Sam Mamady Soumah to CEO of Simfer S.A.	30 July 2008
<b>C-0094</b>	Letter from the Ministry of Mines to BSGR	3 November 2008
<b>C-0095</b>	Letter from BSGR to the Ministry of Mines	6 November 2008

<b>C-0096</b>	Letter from the Minister of Mines to BSGR and Rio Tinto	11 February 2009
<b>C-0097</b>	Letter from Minister of Mines to Rio Tinto	14 July 2009
<b>C-0098</b>	Letter from Asher Avidan of BSGR to the Minister of Mines, Louncény Nabe	5 August 2008
<b>C-0099</b>	Guinea World Bank data showing Guinea's GDP in 2006 at US\$2.821 billion	
<b>C-0100</b>	Letter from the Minister of Mines to Rio Tinto	26 June 2009
<b>C-0101</b>	Letter from A. Avidan of BSGR to Minister of Mines Mahmoud Thiam	21 January 2009
<b>C-0102</b>	Confirmation of BSGR payment from the Environment Ministry	14 October 2009
<b>C-0103</b>	Vale Weekly Guinean Press Review (with translation)	28 February 2011
<b>C-0104</b>	Letter from Asher Avidan to the Government of Guinea	2012
<b>C-0105</b>	Heenan Blaikie Opinion	20 December 2011
<b>C-0106</b>	Memorandum of meeting between Asher Avidan and Walter Hennig	20 March 2012
<b>C-0107</b>	Transcript of meeting between Asher Avidan and Walter Hennig	28 March 2012
<b>C-0108</b>	Transcript of meeting between Asher Avidan and Walter Hennig	29 March 2012
<b>C-0109</b>	Transcript of meeting between Asher Avidan and Walter Hennig	1 April 2012
<b>C-0110</b>	Africa Confidential, " <i>Condé takes on Steinmetz</i> "	21 June 2013
<b>C-0111</b>	i24News, " <i>Four Israelis arrested in Guinea, suspected of plotting coup</i> "	30 September 2013
<b>C-0112</b>	Forged Commission agreement between BSG Resources Guinea and Matinda and Co. Limited	27 February 2008
<b>C-0113</b>	Forged Memorandum of Understanding	28 February 2008
<b>C-0114</b>	Letter from bailiff Nassif Moussi to BSGR	8 June 2010
<b>C-0115</b>	Letter from BSGR Guinea to Nassif Moussi	20 June 2010
<b>C-0116</b>	Letter from Nassif Moussi to BSGR	23 June 2010

<b>C-0117</b>	Letter from Nassif Moussi to BSGR	30 July 2010
<b>C-0118</b>	BSGR "Issue of Bonds for Capital Market" – TML Ltd of BSGR Group	July 2007
<b>C-0119</b>	Maalot Standard & Poors Affiliation – Main considerations for initial rating of BSG Resources Limited by TMI Ltd	July 2004
<b>C-0120</b>	Certificate of Name Change	10 May 2004
<b>C-0121</b>	Certificate of Incorporation of BSGR Treasury Services	30 May 2005
<b>C-0122</b>	Resolution of the Sole Director of BSGR Treasury Services Limited ("The Company")	4 February 2013
<b>C-0123</b>	Certificate of Incorporation of Monital Investments Limited	28 October 2005
<b>C-0124</b>	Certificate of Name Change	30 January 2006
<b>C-0125</b>	Share Purchase Agreement between BSGR Steel Holdings Limited and Pentler Holdings Limited	24 March 2008
<b>C-0126</b>	Deed of Incorporation of BSG Resources (Guinea) Limited Sarl	24 November 2006
<b>C-0127</b>	Advisory Services Agreement between BSGR Guernsey and RAS Services	28 February 2009
<b>C-0128</b>	RAS Invoices to BSGR Guinea	28 February 2009 – 31 December 2009
<b>C-0129</b>	BBC News, " <i>Guinea Profile, Timeline</i> "	18 September 2014
<b>C-0130</b>	BBC News, " <i>Guinea junta names banker as PM</i> "	30 December 2008
<b>C-0131</b>	Transcript of Meeting between Minister of Mines Mahmoud Thiam and Sammy Mebiame (the Mebiame Tapes)	Undated
<b>C-0132</b>	Open letter from Mr Thiam to President Condé	26 November 2012
<b>C-0133</b>	Email from M. Berkner of Skadden Arps to M. Gordon of Clifford Chance et al. (attaching documents including letter from Sam Soumah to Simfer SA, dated 22 May 2008)	9 April 2010
<b>C-0134</b>	Letter from Vice Chairman of the Commission, Maitre Momo Sakho to the Prime Minister	19 December 2009
<b>C-0135</b>	Confirmation Certificate issued by the CPDM	19 March 2010
<b>C-0136</b>	Letter from Minister of Mines, Mahmoud Thiam, to Eugene	4 January 2010

	Shannon, Minister of Mines and Land, Republic of Liberia	
<b>C-0137</b>	International Finance Corporation, " <i>IFC acquires stake in Guinea Iron Ore Project TO Support Sustainable Mine Development</i> "	5 September 2006
<b>C-0138</b>	City AM, " <i>Rio Tinto clinches West African Mining deal</i> "	19 March 2010
<b>C-0139</b>	Email from Mr Thiam to Nik Zuks of Bellzone	5 November 2010
<b>C-0140</b>	Status Report	December 2010
<b>C-0141</b>	Norton Rose Fulbright, "Amendments to the Guinean Mining Code"	June 2013
<b>C-0142</b>	Overseas Development Institute, "Guinea elections: a watershed for the private sector?"	27 September 2013
<b>C-0143</b>	The Sunday Times, " <i>Edmonds wins big in Guinea</i> "	6 October 2013
<b>C-0144</b>	The Sunday Times " <i>Secret deal threatens big miners: BHP Billiton and Rio Tinto at risk after shadowy middleman strikes backdoor pact in Guinea</i> "	3 June 2012
<b>C-0145</b>	M&G, " <i>Tokyo-linked company in Guinea row</i> "	29 June 2012
<b>C-0146</b>	Onyx group structure chart	31 December 2014
<b>C-0147</b>	Letter from FTI Consulting to Dag Cramer	14 November 2012
<b>C-0148</b>	Emails from Dag Cramer to Asher Avidan, Benjamin Steinmetz and David Kavanagh	13 - 14 November 2012
<b>C-0149</b>	Transcript of meeting between Dag Cramer and Lord Malloch-Brown	19 November 2012
<b>C-0150</b>	Extracts from miscellaneous emails provided by FTI in response to Mr Beny Steinmetz's subject access request under the Data Protection Act 1998, p.1	30 March - 13 November 2012
<b>C-0151</b>	Financial Times " <i>Steinmetz unit embroiled in US probe of \$2m payment for African mine rights</i> "	20 April 2013
<b>C-0152</b>	Reuters, " <i>Update 1 – Brazil's Vale say Guinea halts railway upgrade</i> "	20 April 2011
<b>C-0153</b>	Letter from BSGR to the Technical Committee	26 December 2012
<b>C-0154</b>	Letter from the Technical Committee to BSGR Guinea	4 March 2013



<b>C-0155</b>	Letter from BSGR to the Technical Committee	15 March 2013
<b>C-0156</b>	Letter from Skadden to the Technical Committee	16 January 2014
<b>C-0157</b>	████████████████████	██████████