## 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

BETWEEN:

**BSG** Resources Limited

Claimant

and

The Republic of Guinea

Respondent

## INDEX OF FACTUAL EXHIBITS TO THE CLAIMANT'S RESPONSE TO THE REQUESTS OF THE REPUBLIC OF GUINEA UNDER ARTICLES 28(1) AND 39(1) OF THE ICSID ARBITRATION RULES

Exhibit	DOCUMENT	DATE
C-28	Media Part "Guinea, mining paradise that makes the world's mouth water"	7 October 2013
C-29	Rio Tinto Press Release "Rio Tinto and Government of Guinea sign new agreement for Simandou iron ore project"	22 April 2011
C-30	Guinea Special Analysis	25 January 2013
C-31	Africa Mining Intelligence "Shelia Khama"	25 June 2013
C-32	Africa Mining Intelligence "US RusAl to sign \$832 million check for Conakry"	26 March 2013
C-33	The Carter Centre – Observing the 2010 Presidential Elections in Guinea – Final Report	22 November 2011
C-34	The Guardian "Guinea military declares state of emergency"	18 November 2010
C-35	BSG Resources Limited v. Republic of Guinea, ICSID ARB/14/22 Procedural Order No.1 — (French)	20 April 2015
C-36	Overview of Press Coverage	l October 2012 – 27 November 2013

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C-37	BSGR Press Release – "BSGR to Resist Smear Campaign to Undermine Position in Guinea"	28 September 2012
C-38	BSGR Press Release – "Statement regarding Simandou Project, Guinea"	31 January 2013
C-39	BSGR Press Release – "Statement regarding Guinea - Opportunities available for people of Guinea being destroyed by discredited regime"	25 March 2013
C-40	BSGR Press Release – "Beny Steinmetz and BSG Resources sue FTI Consulting LLP and Lord Malloch-Brown"	II April 2013
C-41	BSGR Press Release – "Response to press speculation"	9 May 2013
C-42	BSGR Press Release – "BSG Resources protests at illegal detention of its employees in Guinea and pledges to support them"	17 May 2013
C-43	BSGR Press Release – "Toure and Bangoura File, Guinea"	5 June 2013
C-44	BSGR Press Release – "BSG Resources receives compensation and costs from FTI Consulting and Lord Malloch-Brown	10 June 2013
C-45	BSGR Press Release – "Beny Steinmetz counters smear campaign"	12 September 2013
C-46	BSGR Press Release – "BSGR and Beny Steinmetz sue French Publication Le Canard Enchaine for Libel"	3 October 2013
C-47	BSGR Press Release – "Statement to the media"	4 October 2013
C-48	BSGR Press Release – "Statement"	6 November 2013
C-49	Press Articles from 1 January 2014 to 31 July 2014	1 January 2014 - 31 July 2014
C-50	BSGR Press Release — "Government of Guinea published report based on false allegations"	9 April 2014
C-51	BSGR Press Release – "Statement in response to Rio Tinto lawsuit"	30 April 2014
C-52	BSGR Press Release — "BSGR files notice of dispute in relation to mining rights"	7 May 2014
C-53	BSGR Press Release – "BSGR Files Arbitration Claim Against Guinea"	10 September 2014
C-54	BSGR Press Release – "BSGR issue claim for judicial review against SFO and Home Office"	12 December 2014
C-55	BSGR Press Release – "BSGR responds to press speculation"	20 March 2015
C-56	Email from BSGR to the Tribunal	4 March 2015
C-57	The New York Times "Ebola Now Preoccupies Once-Sceptical Leader in Guinea"	30 November 2014
C-58	Guinée News: "Guicopress reliance les travaux de recontructions des camps militaires"	15 May 2015
C-59	UN Economic Commission for Africa, 'Socio-Economic Impacts of Ebola on Africa: Revised Edition', p.11. (English translation)	January 2015
C-60	Bloomberg Business "Guinea Opposition Leader Says Slow Ebola Action Hurts Investment"	27 January 2015
C-61	International SOS – Ebola	3 June 2015

	Catastrophe Containment And Relief Trust – Staff Report; And Press Release	
C-63	IMF Press Release – Guinea – Letter of Intent, Memorandum of Economic and Financial Policies, and Technical Memorandum of Understanding	27 January 2015
C-64	KPMG – Global Mining Institute – Guinea – Country Mining Guide	2014
C-65	Letter from bailiff Nassif Moussi to BSGR	8 June 2010
C-66	Letter from BSG Resources (Guinea) to bailiff Nassif Moussi (French and English)	20 June 2010
C-67	Letter from bailiff Nassif Moussi to BSG Resources (Guinea)	23 June 2010
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