

**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:

- 1. BSG RESOURCES LIMITED**
- 2. BSG RESOURCES (GUINEA) LIMITED**
- 3. BSG RESOURCES (GUINEA) SÀRL**

Claimants

and

THE REPUBLIC OF GUINEA

Respondent

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| Exhibit No. | Document | Date |
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| C-0001 | BSGR's Chronicle of Events and Overview of BSGR's Iron Ore Investment in Guinea in Response to the Technical Committee | 26 December 2012 |
| C-0002 | BSGR Presentation | May 2005 |
| C-0003 | Letter from Cesare Morelli to Marc Struik | 15 June 2015 |
| C-0004 | Decree No. 2006/706/MMG/SGG | 6 February 2006 |
| C-0005 | Decree No. 2006/707/MMG/SGG | 6 February 2006 |
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| C-0011 | Louceny Nabe Declaration | 8 May 2014 |
| C-0012 | Decree No. A 2009/1327/PR/MMEH/SGG | 10 June 2009 |
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| C-0027 | Order of Service Re Reconstruction of the Conakry-Kankan railroad issued by Mahmoud Thiam | 2 July 2010 |
| C-0028 | Dag Cramer Judicial Review Witness Statement | 25 November 2014 |
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| C-0032 | Letter from VBG Vale BSGR Guinea to Ministry of Mines | 14 September 2011 |
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| C-0036 | Letter from BSGR to the President of Guinea | 14 March 2011 |
| C-0037 | Media Part <i>"Guinea, mining paradise that makes the world's mouth water"</i>) | 7 October 2013 |
| C-0038 | Financial Times, <i>"Guinea to review mining licences"</i> | 4 March 2011 |
| C-0039 | Letter from Minister of Transport El Hadj Tidiane Traoré to BSGR Guinea | 8 April 2011 |
| C-0040 | Letter to the President of Guinea regarding Memorandum on joint enterprise between Vale and BSGR | 20 April 2011 |
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| C-0056 | James Libson Witness Statement in support of BSGR's Judicial Review Application | 26 November 2014 |
| C-0057 | Transcript of Chatham House Q&A Session " <i>Guinea in Transition: Reform, Resources and Regional Relations</i> " | 14 June 2013 |
| C-0058 | Transcript of Channel 4 news broadcast of " <i>Guinea Corruption and diamonds</i> " | 17 June 2013 |
| C-0059 | Financial Times, " <i>Guinea corruption probe advances but wait for Simandou goes on</i> " | 21 October 2013 |
| C-0060 | Transcript of interview with Alpha Condé | 4 November 2013 |
| C-0061 | Rio Tinto Press Release " <i>Rio Tinto and Government of Guinea sign new agreement for Simandou iron ore project</i> " | 22 April 2011 |
| C-0062 | Africa Mining Intelligence, " <i>US RusAl to sign \$832 million check for Conakry</i> " | 26 March 2013 |
| C-0063 | Sable Mining Africa, " <i>Focusing on Iron Ore. Sable Mining Report and Accounts</i> " | 2013/2014 |
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| C-0110 | Africa Confidential, " <i>Condé takes on Steinmetz</i> " | 21 June 2013 |
| C-0111 | i24News, " <i>Four Israelis arrested in Guinea, suspected of plotting coup</i> " | 30 September 2013 |
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| C-0119 | Maalot Standard & Poors Affiliation – Main considerations for initial rating of BSG Resources Limited by TMI Ltd | July 2007 |
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| C-0134 | BBC News, “ <i>Guinea junta names banker as PM</i> ” | 30 December 2008 |

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| C-0140 | Letter from Minister of Mines, Mahmoud Thiam, to Eugene Shannon, Minister of Mines and Land, Republic of Liberia | 4 January 2010 |
| C-0141 | International Finance Corporation, <i>"IFC acquires stake in Guinea Iron Ore Project TO Support Sustainable Mine Development"</i> | 5 September 2006 |
| C-0142 | City AM, <i>"Rio Tinto clinches West African Mining deal"</i> | 19 March 2010 |
| C-0143 | Email from Mr Thiam to Nik Zuks of Bellzone | 5 November 2010 |
| C-0144 | Status Report | December 2010 |
| C-0145 | Norton Rose Fulbright, "Amendments to the Guinean Mining Code" | June 2013 |
| C-0146 | Overseas Development Institute, "Guinea elections: a watershed for the private sector?" | 27 September 2013 |
| C-0147 | The Sunday Times, <i>"Edmonds wins big in Guinea"</i> | 6 October 2013 |
| C-0148 | 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 |
| C-0149 | M&G, <i>"Tokyo-linked company in Guinea row"</i> | 29 June 2012 |
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| C-0154 | 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 |
| C-0155 | Financial Times <i>"Steinmetz unit embroiled in US probe of \$2m payment for African mine rights"</i> | 20 April 2013 |
| C-0156 | Reuters, <i>"Update 1 – Brazil's Vale say Guinea halts railway upgrade"</i> | 20 April 2011 |
| C-0157 | Letter from the Technical Committee to BSGR Guinea | 4 March 2013 |
| C-0158 | Letter from Skadden to the Technical Committee | 16 January 2014 |
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