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Barrister and Solicitor of the High Court of Sierra Leone

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23 July 2012

The Managing Director
London Mining Company Limited
56B Main Motor Road
Wilberforce
Freetown

Dear Sir/Madam,

Re: Flooding of farmlands, pollution of water sources and destruction of environment at Manonkoh Village by London Mining Company Limited

I have been consulted and retained to act for the residents of Manonkoh Village, Marampa Chiefdom in northern Sierra Leone and I write on their instructions in respect of the above.

My clients informed me that sometime during the dry season of 2010 they began observing an uncharacteristic increase in the water levels of their swamp lands which they used for the cultivation of rice, groundnut, cassava and other important food crops on which the community depended. Upon investigation by the village head Mohamed Fofanah and other community elders, they learnt that activities at your company's mining site at Marampa, a short distance from the village, were responsible for the onset of flooding. Your company's servants, agents or privies had interfered with a water tunnel constructed by a previous mining company Development Corporation of Sierra Leone (DELCO) to safely conduct waste water from its mining operations to the river Rokel, by erecting a concrete wall across the tunnel thus preventing waste water from safely emptying into the river and ensuring that it dispersed into surrounding villages including Manonkoh. This was done, my clients informed me, so that your company could extract ore from the passage way.

As a result of your company's action, over 350 hectares of my clients' swamp lands are now completely under water, a variety of food crops have been destroyed, water sources for personal and domestic uses have been polluted and their health and well-being continue to be threatened. Farming, the major economic activity of the village has been put on hold for many months.

My clients also informed me that several attempts by community leaders to engage with your company to resolve this crisis have been rebuffed or met with callous indifference. I was told that at one point a senior officer of your company accepted responsibility and promised to work with the community to resolve the problem, only to later renege on that promise. My clients also showed me a Memorandum of Understanding prepared by your company offering 210 bags of rice to them in exchange for their silence over the matter. They quite justifiably refused to sign the MoU, rejecting your company's rather contrived offer of 'humanitarian assistance'.

Your company's conduct is in breach of several duties of care imposed by both common law and statute, a violation of the OECD Guidelines for Multinational Enterprises and a breach of the basic rights of my clients, resulting in tremendous harm to them.

In view of the above, I am instructed to offer an opportunity for meaningful engagement between your company and my office on how you intend to remedy these serious breaches. Should I not hear from you within 7 working days from the date of this letter, I have peremptory instructions to institute legal action against your company in Sierra Leone without prejudice to pursuing other lines of action against your company elsewhere.

I hope you will not make this necessary.

Yours faithfully,



Sonkita Conteh Esq.

Cc

- (1) Mr. Mohamed Fofanah
Headman
Manonkoh Village
- (2) The Minister, Mines and Mineral Resources
Youyi Building
Freetown
- (3) The Executive Director
Environment Protection Agency
Freetown