



Environmental & Social Management System

Emergency Response Plan

Emergency Response Plan		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-ERP-PLN-001	Rev: 1

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1 INTRODUCTION

1.1 Document Number

This document is the Emergency Response Plan (ERP) for the Öksüt Gold Project. The document reference number for this Management Plan is OMAS-ESMS-ERP-PLN-001.

1.2 Purpose

This ERP is designed to provide a high-level overview of the procedures and activities in place to mitigate and control the impacts of an occupational safety or environment incident at OMAS during the operations phase. Procedures will be developed by OMAS to set out specific instructions to manage emergency response situations.

Whereas this document provides the overall approach and commitment to emergency response and preparedness, the specific Procedures provide detailed command and control and response actions, and it is these Procedures that must be used in conjunction with this overarching Management Plan in the event of an emergency situation.

The purpose of this Management Plan is to:

- outline the applicable legislative framework, lender requirements and corporate Standards relevant to OMAS's emergency preparedness and response planning activities;
- define OMAS Project commitments;
- present an overview of OMAS Project safety and environmental hazards during the Operations Phase and summary of OMAS Project emergency response planning activities;
- define implementation roles and responsibilities and set out applicable management interfaces;
- define monitoring and reporting procedures, including Key Performance Indicators;
- define training requirements;
- set out references for supporting materials and information.

1.3 Application

The requirements set out in this Management Plan apply to all OMAS activities throughout the lifecycle of the Öksüt Gold Project, including those carried out by contractors.

This Emergency Response Plan (is based on the OMAS Environmental & Social Management System Framework (OMAS-ESMS-001), which is owned by the OMAS General Manager. Any subsequent changes to the OMAS Environmental & Social Management System (ESMS) Framework may result in changes to this ERP.

1.4 Commencement

This ERP applies from 1 April 2016.

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1.5 Authority and Management

The OMAS Executive Committee approved this ERP on 1 March 2016.

This ERP is owned by the OMAS Health, Safety, Environment and Training Manager. This ERP will be reviewed on a minimum of a six monthly basis during construction and commissioning. During steady state operations, this Management Plan will be reviewed on an annual basis to determine whether any changes or updates are required to the plan unless a more frequent update is required to reflect changing project design or procedures.

Any requests for changes to this ERP must be addressed to the owner of this management plan and will be subject to appropriate review and approval processes as outlined in the Management of Change (MOC) procedure set out in the ESMS Framework.

2 SCOPE

2.1 Scope of this ERP

This document summarises OMAS's emergency response planning activities.

OMAS emergency response plans cover all OMAS operations include contractor activities. Implementation by contractors is addressed in the Contractor Management Framework (OMAS-ESMS-CM-PLN-001).

Detailed implementing Procedures will be developed by OMAS to set out specific instructions to manage emergency response situations.

2.2 Overlaps with other Management Plans

This ERP is part of the overall suite of Management Plans developed for the OMAS Project and as described in the ESMS Framework.

Reference is made here to the following Management Plans that have direct cross-linkages to emergency preparedness and response:

- Transport Management Plan (OMAS-ESMS-TMP-PLN-001), in relation to major traffic accidents involving Project vehicles.
- Hazardous Materials Management Plan (OMAS-ESMS-HM-PLN-001), in relation to major releases of hazardous materials or fire and explosion.
- Community Health, Safety and Security Management Plan (OMAS-ESMS-CHSS-PLN-001).
- Cyanide Management Plan (OMAS-ESMS-CY-PLN-001).
- Stakeholder Engagement Plan (OMAS-ESMS-SEP-PLN-001).

3 ROLES AND RESPONSIBILITIES

3.1 Key Roles and Responsibilities for Management Plan Implementation

Principal roles and responsibilities for the implementation of this plan are outlined below.

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Table 1: Key Roles and Responsibilities

Role	Responsibilities
OMAS General Manager	<ul style="list-style-type: none"> Approval of this Plan and resources required for implementation.
OMAS Health, Safety, Environment and Training Manager	<ul style="list-style-type: none"> Ensure Project compliance with the Project Standards and other requirements set out in this Plan. Overall responsibility for Plan scope and implementation. Development, monitoring and revision of this Plan. Implementing the relevant emergency response plans.
Emergency Response Team Leader	<ul style="list-style-type: none"> Implementing the relevant emergency response plans. Coordinating the tactical response to the incident by the Emergency Response Team (ERT).
Emergency Services Coordinator	<ul style="list-style-type: none"> Liaison between ERT Leader/Incident Commander and site and external emergency response organisations.
Incident Commander	<ul style="list-style-type: none"> Coordinate incident response and ongoing response actions in consultation with ERT Leader.
OMAS Contactors	<ul style="list-style-type: none"> Undertake emergency response planning activities in accordance with the Contractor Management Framework (OMAS-ESMS-CM-PLN-001).

3.2 Key Interfaces

The OMAS General Manager is accountable for delivering this ERP. Key interfaces in the implementation of this ERP (i.e. roles with responsibility for inputting to elements of this plan) include:

- Director, External Affairs and Sustainability in relation to ensuring that emergency incident response plans identify the communities that may be affected by an incident at site. The OMAS emergency response procedures will include how potentially affected communities will be informed of any incidents in a timely fashion. Specific community safety related activities are specified in the Community Health, Safety and Security Management Plan (OMAS-ESMS-CHSS-PLN-001).
- Project Manager (construction) in relation to implementation of construction phase activities to manage sources of potential safety and environmental incidents.
- Mine Operations Manager in relation to implementing operations phase activities to manage sources of potential safety and environmental incidents.
- The HSE and Training Manager is accountable for implementing a Worker Health and Safety Management Plan during operations.

4 PROJECT STANDARDS

Applicable Standards must be complied with for all Project activities (the “Project Standards”). Project Standards comprise:

- applicable Turkish Standards;
- Turkish EIA requirements;

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- other commitments to and requirements of Turkish Government authorities;
- applicable international standards and guidelines;
- applicable Centerra and OMAS standards, policies and procedures;
- other industry guidelines with which OMAS has committed to comply.

4.1 Applicable Turkish National Standards

- Communiqué on Major Accident Prevention Policy Documents (Official Gazette 29435, 4 August 2015).
- Regulation on Prevention and Effect Control of Major Industrial Accidents (Official Gazette 28867, 30 December 2013).

4.2 Turkish EIA requirements

Measures to be taken during use/in case of emergency are presented in Attachment 6 of the EIA

4.3 Other Commitments to and Requirements of Turkish Government Authorities

None applicable.

4.4 Applicable International Standards and Guidelines

The international standards which OMAS will implement are those set by the European Bank for Reconstruction and Development (EBRD).

EBRD Performance Requirement 4 *Health & Safety* sets out requirements with regard to emergency preparedness and response in accordance with EU requirements under the Seveso III Directive¹. Key requirements are the preparation and/or undertaking of:

- Major Accident Prevention Policy
- Safety Management System
- Safety Report
- Emergency Response Plan
- Disclosure of key information to the public

4.5 Applicable Centerra and OMAS Standards, Policies and Procedures

- OMAS Minimum HSE Operating Requirements, Safety Operating Policy and Procedure. SOP-HSES-001.
- Centerra Health and Safety Incident Reporting Standard, September 2014
- Centerra Environmental Incident Categorisation and Reporting Standard, January 2015.

¹ Directive 2012/18/EU of 4 July 2012 on the control of major-accident hazards involving dangerous substances (this replaces Directive 96/82/EC)

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Detailed implementing Procedures will be developed by OMAS to set out specific instructions to manage emergency response situations.

4.6 Other industry guidelines with which OMAS has committed to align with

UNEP APELL For Mining

The UNEP APELL “*Guidance for the Mining Industry in Raising Awareness and Preparedness for Emergencies at Local Level*” also provides applicable guidelines for emergency preparedness and response for mining operations. This guidance is focused on environmental and community impacts resulting from mining operations such as tailings dam failure, collapse of waste heaps. This guidance has been taken into account in the Emergency Response Plan.

International Cyanide Management Code

The International Cyanide Management Code covers emergency response related to the transportation, use and management of cyanide. The following key requirements (“Standards of Practice”) are set out:

- Prepare detailed emergency response plans for potential cyanide releases.
- Involve site personnel and stakeholders in the planning process.
- Designate appropriate personnel and commit necessary equipment and resources for emergency response.
- Develop procedures for internal and external emergency notification and reporting.
- Incorporate into response plans monitoring elements and remediation measures that account for the additional hazards of using cyanide treatment chemicals.
- Periodically evaluate response procedures and capabilities and revise them as needed.

4.7 Summary of Applicable Project Standards

OMAS will comply with the more stringent of national standards and applicable lender standards, with the more stringent standards representing the Project Standards.

5 MITIGATION MEASURES AND MANAGEMENT CONTROLS

5.1 Potential Hazards and Risk Assessment

The OMAS Emergency Response Plan incorporates outputs from risk identification and assessment activities to identify events and risk scenarios that may impact OMAS business activities. Identified risks are drawn from the following supporting processes:

- Risk Identification processes as part of the Feasibility Study and permitting process;
- Critical and Semi Quantitative Risk Assessments undertaken as part of the Health and Safety Management System;
- Social Risk Analysis undertaken as part of the social impact assessment.

Potential events that could impact Project-related activities, personnel or assets include:

- fire (contained and conflagration);

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- explosion (accident or terrorist);
- earthquake;
- slope failure, mudslide and subsidence, including failure of heap leach facilities;
- epidemic or pandemic, e.g. avian and human pandemic;
- weather – extreme temperatures, snow storms or extreme rainfall;
- aircraft accidents;
- road incident or road obstruction (accident, chemical spill, bridge/culvert collapse etc.) (see also Transport Management Plan (OMAS-ESMS-TMP-PLN-001);
- spillage of hazardous or potentially-hazardous materials (on or off-site) Hazardous Materials Management Plan (OMAS-ESMS-HM-PLN-001);
- industrial action;
- community unrest;
- criminal, sabotage or arson attack;
- security emergency;
- geopolitical emergency;
- interruption to or failure of telecommunications systems;
- failure of significant computer systems;
- access roads closed.

Incident Classification

OMAS has identified five levels of incident to guide the incident response.

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Table 2: OMAS Incident Classification

		INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC
Worst Case Rating ->		1	2	3	4	5
		IMPACT				
Impact Categories	General	Requires response from departmental staff under routine procedures.	Material deterioration in achievement of results. Requires response from dept management staff.	Significant deterioration in achievement of results. Requires response from division management.	Fundamental threat to operating results. Requires immediate senior management attention.	Threatens survival of the site/company in its current form. Requires full-time senior management attention.
	Health and Safety	First Aid	Medical Aid	Lost Time Incident	Fatality	Multiple fatalities
	Environmental	Level I - unauthorized disposal of benign waste	Level II - non-material (minor) environmental impact	Level III - material environmental impact	Level IV - serious (major) environmental impact	Level V - catastrophic, irreversible impact to environment
	Community / Media / Reputation	Some community complaints. Adverse local public or media attention.	Some adverse State/Provincial media attention for a brief period. Criticism by NGOs.	Some national media / public / NGO attention for an extended period.	Persistent adverse national media / public / NGO attention	Adverse International media. Damaging NGO campaign. License to operate compromised.

All incidents with a consequence of major (e.g. single fatality) or catastrophic (e.g. multiple fatalities) require notification of the following within 24 hours or earlier:

Table 1. Incident Notification & Investigation						
Category	Classification	Board Reportable	Responsible Manager	Notification Period to Corporate	Investigation Requirements	Investigation Timeframe
Injury	Fatality	✓	Chief Operating Officer <i>(cc: Country President & Director of Health and Safety)</i>	3 hours	FORMAL: ICAM root cause analysis and lead investigator to be appointed by COO with assistance from the Director of Health and Safety. Findings to be presented to the Executive Management and Board.	21 Days
SI	As Determined	✓	Chief Operating Officer <i>(cc: Country President & Director of Health and Safety)</i>	12 hours	FORMAL: ICAM root cause analysis and lead investigator to be appointed by the Country President. Findings to be presented to the Executive Management and Board.	21 Days
Injury/ Illness	Lost Time	TBD by COO	Chief Operating Officer <i>(cc: Country President & Director of Health and Safety)</i>	24 hours	FORMAL: ICAM root cause analysis and lead investigator appointed by the Country President. Findings to be presented to the Executive Management and Board.	21 Days
Other (Major)	As Determined	TBD by COO	Chief Operating Officer <i>(cc: Country President & Director of Health and Safety)</i>	24 hours	FORMAL: ICAM root cause analysis and lead investigator appointed by the Country President. Findings to be presented to the Executive Management and Board.	21 Days
Other (Minor)	As Determined	N/A	Site Dept. Head	Included in monthly report (reported on site within 10 days)	Basic investigation initiated by the Department Head using site's investigation process, including informal causal analysis.	3 Days

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Notification procedures for external stakeholders (including Lenders) are set out in the ESMS Framework (OMAS-ESMS-001).

5.2 Management Controls

In response to an emergency, the prime concerns are to:

- protect Project personnel, the community, the environment, OMAS assets and information;
- ensure that the Project can continue to operate with as little effect on schedule as possible in the situation;
- ensure that stakeholders and staff do not lose confidence in the Project and its ability to continue in operation.

The primary aim of the ERP is to protect and preserve life, the environment and assets. The implementation of emergency response procedures will include details on the following components:

- first actions;
- alert levels and reporting lines;
- internal and external notification and communication;
- distribution list (phone cascade, electronic and paper messages);
- activation of the Emergency Response Team;
- activation of the Emergency Response Plan;
- list of key resources (internal/external) and contact information (centre of expertise database);
- onsite command post;
- location of resources;
- logistics;
- site evacuation;
- protection of vital records protocols;
- external emergency services/security protocols, muster points and assembly areas;
- emergency equipment;
- search and rescue teams;
- operations shutdown;
- locking of equipment;
- control of energy sources;
- location of main valves and main switches;
- dangerous goods and hazardous materials;
- emergency communication protocol;
- site re-integration (recovery);
- post-incident investigation protocols;
- internal notifications/reporting tools;

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- lessons learned review processes including management of implementation of recommendations from this process; and
- ER training and practice drills.

Table 3: Key Management Controls

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
ERP01	Hazard identification and context	Throughout Operations	<p>Hazard and risk identification process in place and updated annually. Risk identification process informed by hazards and risks identified at a functional level including Safety, Environment and Communities risks.</p> <p>Risk analysis includes Ankara, Develi, mine site, associated facilities, transport routes and other off-site infrastructure.</p> <p>Centerra Risk Assessment procedures are used to inform hazard and risk identification process.</p> <p>Those risks classified as having a residual risk ranking of high or critical will be reviewed annually. All other risks will be reviewed every three years.</p>	Health, Safety, Environment and Training Manager	Hazard and risk register developed and informs risk mitigations detailed in implementing Emergency Response Procedures
ERP02	Emergency Response Planning	Throughout Operations	<p>OMAS Emergency Response Procedures in place for Ankara-based activities and site-based activities, including off-site activities (e.g. transport of materials).</p> <p>Emergency Response Procedures will be supported by the Risk Assessment and will include:</p> <ul style="list-style-type: none"> • Major Accident 	Health, Safety, Environment and Training Manager	Emergency Response Procedures

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
			<p>Prevention Policy</p> <ul style="list-style-type: none"> • Safety Management System • Safety Reports • Emergency Response Procedures • Procedures for disclosure of key information to the public 		
ERP03	Emergency Response Planning	Throughout Operations	<p>Emergency Response Procedures identify the communities that may be affected by an incident. OMAS will inform affected communities of potential hazards in a culturally appropriate manner, and disclose emergency preparedness and response activities to affected communities.</p> <p>OMAS will engage with local authorities, local emergency services and local community representatives during the development of Emergency Response Procedures.</p> <p>The Emergency Response Procedures will include how potentially affected communities and local authorities will be informed of any incidents in a timely fashion and will be involved in testing Emergency Response measures</p>	Health, Safety, Environment and Training Manager	<p>Emergency Response Procedures</p> <p>Records of meetings</p>
ERP04	Emergency Response Planning	Throughout Operations	<p>The Emergency Response Procedures will include procedures to cover spill response and focus on accidental spills of hazardous substances.</p>	Health, Safety, Environment and Training Manager	<p>Emergency Response Procedures</p> <p>Hazardous</p>

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
			OMAS will inform affected communities of potential spill hazards in a culturally appropriate manner, and disclose spill response activities to affected communities. Spill response measures will be tested with potentially affected communities and local authorities. In the event of a spill, the affected community and local authorities will be informed of any incidents in a timely fashion.		Materials Management Plan
ERP05	Emergency Response Planning	Throughout Operations	The Emergency Response Procedures will be reviewed annually and updated as required.	Health, Safety, Environment and Training Manager	Evidence of Emergency Response Procedure review and update
ERP06	Emergency Response Planning	Throughout Operations	<p>OMAS will assess the management capacity and technical resources of key local authorities, municipality fire teams, AFAD (Disaster and Emergency Management Authority), Provincial directorate in Kayseri; hospitals etc. on a regular (annual) basis and update the ERP accordingly as required.</p> <p>OMAS will investigate signing MoUs/protocols related to ERP cooperation with the key authorities and will include them in the updated ERP.</p> <p>OMAS will assess the need for capacity building for local authorities and, if required, will consider inclusion within the Community Development Plan (OMAS-ESMS-PLN-CDP-001).</p> <p>The Emergency</p>	Health, Safety, Environment and Training Manager	Records of meetings with local authorities and emergency services. Signed MOUs

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
			Response Procedures will define the agreed roles and responsibilities of external organisations.		
ERP07	Training	Throughout Operations	<p>Emergency response teams will be appropriately trained to deal with anticipated potential emergencies situations, including environmental emergencies.</p> <p>Training will include regular desktop and full-scale exercises for the Emergency Response Team.</p> <p>OMAS will involve local authorities, local emergency services and local community representatives in emergency response exercises.</p>	Health, Safety, Environment and Training Manager	Training records demonstrating that ERT members have received initial and annual refresher training on the Emergency Response Procedures to maintain familiarisation and competency.
ERP08	Training	Throughout Operations	All employees, contractors and visitors will be introduced to and instructed regarding the policies and procedures relating to the OMAS Emergency Response plan. Area specific inductions will be given to individuals working in high risk activity areas.	Health, Safety, Environment and Training Manager	Training records for staff
ERP09	Incident Reporting	Following an incident	<p>Procedures in place to:</p> <ul style="list-style-type: none"> • record incidents; • investigate incidents; • analyse the impact(s) and the potential risk of a future incident; • communicate incident lessons to relevant people/groups as 	Health, Safety, Environment and Training Manager	Review incident reports and incident investigations

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
			appropriate; and <ul style="list-style-type: none"> • manage corrective actions to prevent reoccurrence. 		
ERP10	Emergency Response Plan review	Following an incident	Following activation of the Emergency Response Team, recommendations for changes are to be submitted to the General Manager for review and inclusion in the Emergency Response Plan as appropriate	Health, Safety, Environment and Training Manager	As applicable, evidence of recommendations for change submitted to General Manager
ERP11	Safe Disposal of Materials	Following an incident	Materials and soils contaminated following a hydrocarbon or chemical release and other waste generated during emergency response to spills will be disposed of safely in accordance with the hazardous waste requirements outlined in the Non-Mineral Waste Management Plan (OMAS-ESMS-NMW-PLN-001) and Hazardous Materials Management Plan (OMAS-ESMS-HM-PLN-001).	Health, Safety, Environment and Training Manager and Environment Coordinator	Review of records

6 IMPLEMENTATION SCHEDULE

6.1 Review and Revision of this Plan

This Emergency Response Plan will be reviewed on a minimum of a six monthly basis during construction and commissioning. During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs of OMAS.

The ERP will also be reviewed after any incident or test, which provides opportunity for improvements. It will be the responsibility of the custodian of this Plan, the OMAS Health, Safety, Environment and Training Manager, to coordinate the review and revision of this Plan. The revisions will focus on ensuring the factual content, such as contact information and nominated personnel, is correct. The review and revision will ensure that the ERP information coordinates with the requirements of Centerra, Turkish regulatory requirements and Project Standards.

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Any holder of the plan is to make the OMAS Health, Safety, Environment and Training Manager aware of any errors, omissions or changes as soon as they are aware of them.

If material changes to operating procedures are required (as identified through the Management of Change Procedure contained within the OMAS ESMS Framework), this ERP may also be updated on an “as required” basis.

7 MONITORING

7.1 Overview of Monitoring Requirements

The Monitoring measures that are to be implemented during the operations phase to assess compliance with Project Standards (see *Section 4: Project Standards*) are described in the section.

In the event that monitoring identified non-conformance with Project Standards, these will be investigated and appropriate corrective actions identified (see Component 12 Non-conformance incident and action management of the OMAS ESMS).

7.2 Key Performance Indicators

The table below summarises the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

Table 4: Key Performance Indicators and Monitoring Measures

ID	KPI	Target	Monitoring measure
ERP-KPI 01	Total number of non-compliances with emergency prevention and preparedness measures identified in <i>Table 4</i> of this Plan.	Minimise and target zero per year	See verification column of <i>Table 2</i> .
ERP-KPI 02	Number of emergencies that have triggered the emergency response plan	Minimise and target zero per year	Incident reporting in monthly reports

7.3 Key Monitoring Activities

Key monitoring activities will focus on ensuring compliance with the Project Standards (Section 4) using the key performance indicators established in Section 7.2.

8 TRAINING

All employees of OMAS and Contractors to OMAS are provided with basic training on health, safety and security, including health awareness training and induction.

Training in emergency response preparedness and response is provided for the following:

- induction training;
- job-specific specialist training, e.g. for plant operators;
- emergency response teams.

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Training will be used to communicate business continuity and emergency response and planning to all personnel. An annual training exercise programme will be assembled each year. The programme will be realistic to test response plans and procedures. As a minimum, desktop exercises will take place annually with a full-scale exercise taking place at least every two years

8.1 Induction Training

All employees of OMAS and Contractors to OMAS shall be provided with basic training in spill and emergency response as part of general induction training.

8.2 Job-Specific Training

Environmental Training

The Health, Safety, Environment and Training Department has developed training to provide staff with general information and awareness relating to the management of chemical substances spill. It is required that any staff member who is responsible for the use, storage or management of chemical substances complete the training. Specific training for chemical spill management is to be coordinated and recorded in a training register.

Emergency Response Team Training

Emergency response teams (ERTs) will be appropriately trained to deal with likely emergencies situations, including environmental emergencies. ERT members will receive initial and annual refresher training on the BRMP and ERP to maintain familiarisation and competency.

The emergency response team undertakes drills and training regularly with an emphasis on practical firefighting and search and rescue in an on-site training facility. Training is based around a changing set of activities and is planned and managed on a dynamic basis.

Emergency Response Training – Interface with Local Agencies and Communities

OMAS will undertake meetings with local emergency services and local community representative on emergency response planning on a six-monthly basis as a minimum.

8.3 Other Training Requirements

None specified.

9 AUDIT AND REPORTING

9.1 Auditing

Daily inspections will be carried out by operational area superintendents / supervisors covering a broad range of operational aspects, including community health safety and security issues as appropriate to activities outside the fence line.

Any incidents identified during these inspections will be reported to the incident management system (Component 10 of the ESMS).

Conformance will be monitored in accordance with Component 11 of the ESMS (Monitoring and Evaluation).

All incidents and non-conformances will be reported as per the requirements of the OMAS ESMS as described in the ESMS Framework Document.

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9.2 External Auditing

Conformance with this plan will be subject to periodic assessment as part of the Centerra audit programme and separately by Project Lenders.

9.3 Record Keeping

Records of audits, inspections and incidents will be managed in accordance with OMAS procedures.

10 DOCUMENT CONTROL

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