

OMAS Health & Safety, Environment and Social Management System Framework

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ANNEXURE

Annex A: Centerra Health & Safety Policy

Annex B: OMAS Sustainability Policy

Annex C: OMAS Worker Health & Safety Framework

Annex D: OMAS Policies, Plans and Procedures

1. Introduction

Öksüt Madencilik Sanayi ve Ticaret A.Ş. (“OMAS”) is a wholly owned subsidiary of Centerra Gold Inc. (“Centerra”) and operates in Turkey.

This document describes the Framework of the OMAS Health, Safety, Environment (HSE) and Social Management System and sets out the processes to be adopted across all HSE and Social functions to achieve OMAS HSE and Social objectives.

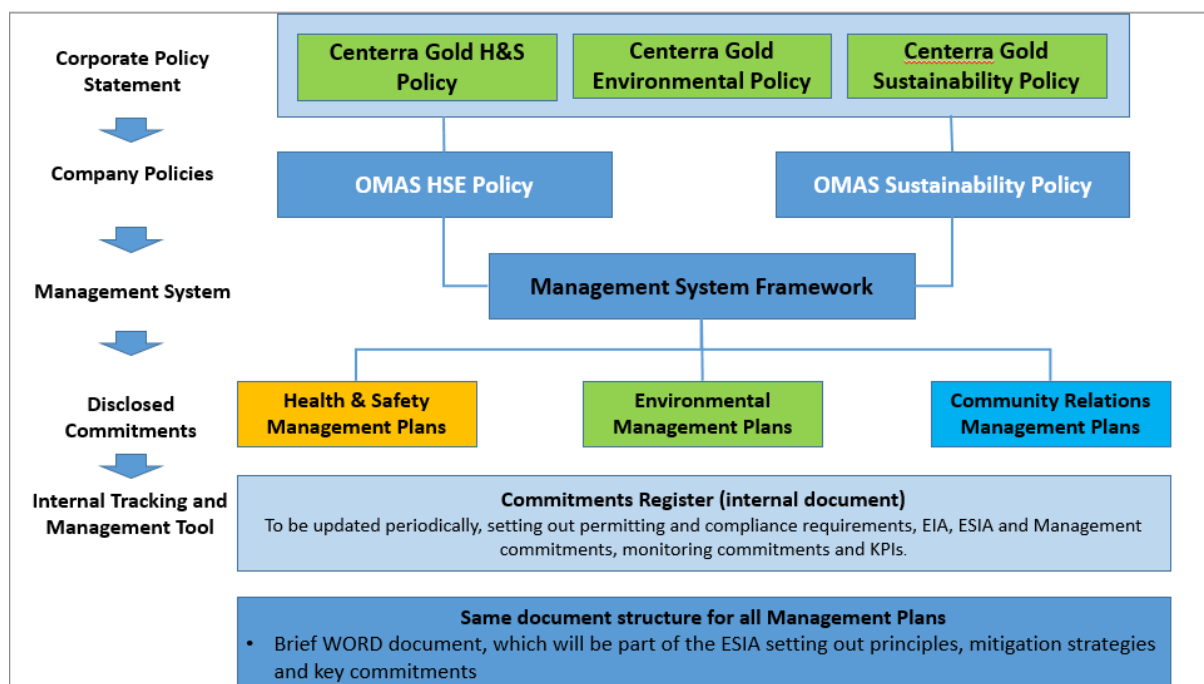
The Framework covers the full spectrum of health, safety, environment (HSE) and social issues and, for simplicity, is referred to as the “ESMS Framework”.

1.1 Approach

The objective is to have a single, consistent and simple approach to the planning and management of HSE and Social risks, whilst retaining flexibility to manage specific issues in the most appropriate manner.

Implementation is undertaken at a functional level, with separately-implemented HSE and Social plans and procedures, all coordinated within a single Management System, valid for all phases of the Project, as outlined in Figure 1 below.

Figure 1: OMAS Policies, Operational Management Plans and Systems



1.2 OMAS HSE and Social Management System

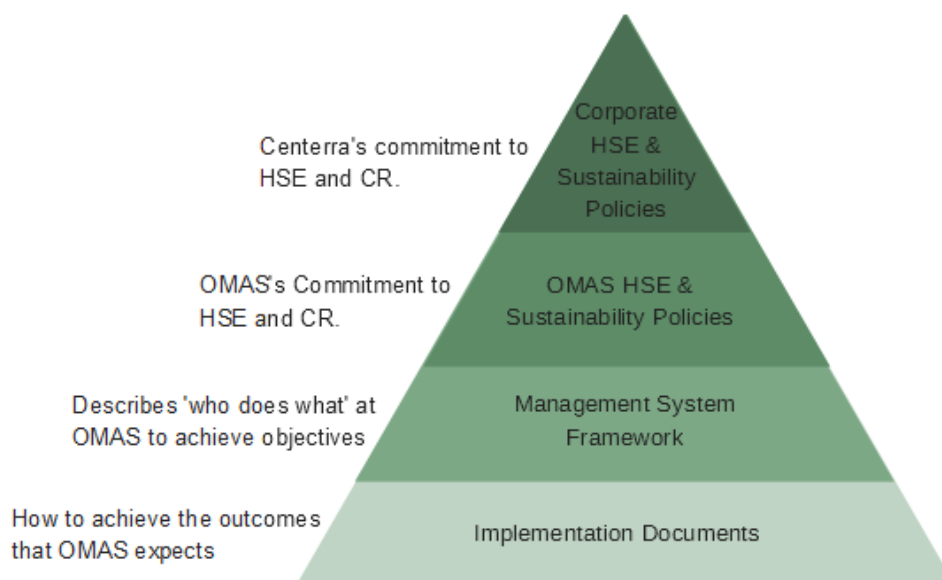
OMAS has an integrated approach and structure to the planning and management of HSE and Social risks. The hierarchy of company policies, systems and plans is set out in Figure 2 below and comprises:

- **Centerra Health and Safety Policy** which set out Centerra’s overall commitment provide a safe and healthy working environment for employees, contractors, visitors and the communities in which it operates. This is provided in *Annex A*.

- **OMAS Sustainability Policy.** This is provided in *Annex B*.
- This document, the **OMAS Environmental and Social Management System Framework (ESMS Framework)**. The ESMS Framework is implemented through:
 - **Management Plans** – which combine the mitigation and management controls from the Turkish EIA, the ESIA, Centerra standard practices and good international industry practice and define key actions and monitoring measures to comply with Project Standards;
 - **Implementing Policies and Procedures** – set out the detailed actions and processes to be implemented by OMAS staff and contractors.

The Worker Health & Safety Management Plan is under preparation by OMAS and will be implemented prior to the commencement of construction activities. The OMAS Worker Health & Safety Framework is set out in *Annex C* and it sets out the key commitments and objectives to be implemented by OMAS.

Figure 2: Hierarchy of Company Policies, Systems and Plans



A list of OMAS Management Plans, Policies and Procedures is set out in *Annex D*.

1.3 Purpose of the Management System

The OMAS Management System is based on the principle of continuous improvement and is designed to:

- Define OMAS objectives and provide a tool to meet those objectives;
- Manage HSE and Social risks effectively during construction, operation and closure;
- Comply with relevant Turkish legislation and good international industry practice¹;
- Implement Centerra and OMAS Policies, Procedures, Guidelines and Standards;
- Assign responsibilities to functions and personnel for Management System implementation;

¹ Namely European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2014) and Performance Requirements (2014).

- Provide a process for identifying opportunities for improvement, and to review and update the Management System.

1.4 Management System Overview

1.4.1 Structure & Approach

The Management System is divided into 13 components, some of which are inter-related. Each component addresses a specific objective that enables OMAS to manage HSE and Social risks. Each component sets out the minimum requirements to meet each objective and refers to implementing procedures or processes.

The Management System is designed as a continual improvement cycle and adopts the methodology of “plan do-check-act”. The structure of the Management System is set out in Figure 3 below.

Figure 3: Management System Structure



1.4.2 Contents of the Management System

This Management System Framework Document outlines:

- Roles and responsibilities of OMAS staff and contractors in implementing the Management System;
- Project Standards;
- Monitoring requirements;
- The specific Components of the Management System.

1.4.3 Review and Updating of the Management System

The Management System will be maintained and updated to reflect the project life cycle. This Framework Document will be reviewed at least once a year or when significant changes deem it necessary, whichever is soonest.

1.4.4 Document Control

The OMAS Director External Affairs and Sustainability is accountable for the effective implementation of this Management System Framework and as such must approve all revisions and updates to this document.

2. Roles and Responsibilities

Table 1 below sets out roles and responsibilities amongst Centerra, OMAS and Contractor staff for implementation of the requirements of this Management System.

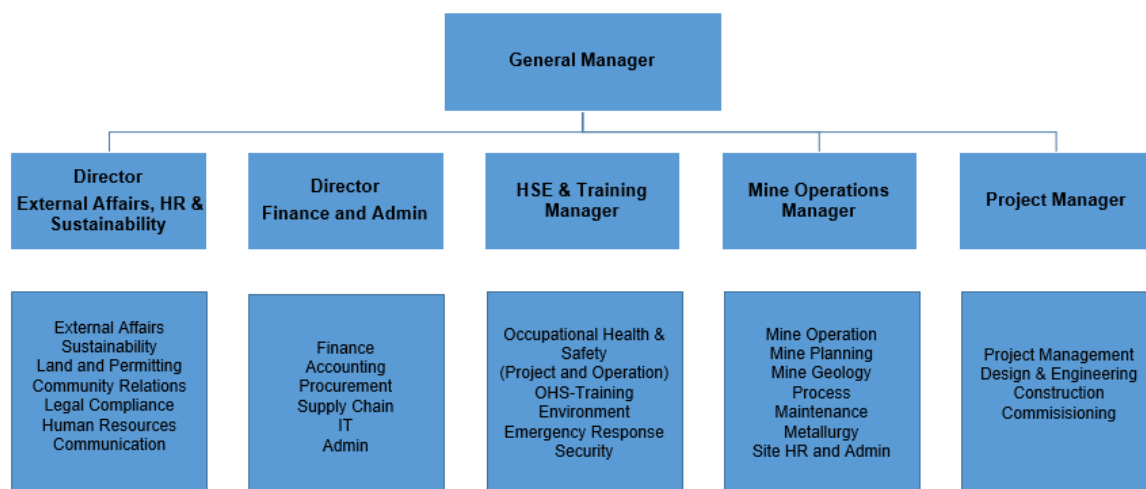
Table 1: Management System Roles & Responsibilities

Role	Responsibilities
Centerra Vice-President Sustainability	<ul style="list-style-type: none"> Provide leadership and direction to achieve HSE and Social goals, targets and objectives. Responsible for the implementation of review process
OMAS General Manager	<ul style="list-style-type: none"> Provide authority and resources for effective implementation of OMAS policies and this Management System Framework
OMAS Finance and Administration Director	<ul style="list-style-type: none"> Ensure OMAS HSE and Social requirements are incorporated into the pre-qualification and tendering processes. Ensure OMAS HSE and Social requirements are included in Scopes of Work and contract terms. Review and assess contractor HSE and Social performance and capability.
OMAS External Affairs & Sustainability Director	<ul style="list-style-type: none"> Overall accountability for the Management System Framework implementation and for general compliance with legislation and other relevant industry HSE and Social standards. Monitor the implementation of the system for review, audit and measurement of HSE and Social performance for all OMAS staff and contractors.
OMAS HSE and Training Manager	<ul style="list-style-type: none"> Development, implementation and monitoring of OMAS HSE Management System. Communication of the HSE Management System throughout OMAS. Ensure all incident reporting and HSE performance requirements are met. Undertake all internal HSE reporting for the Project. Review and assess monthly contractor monitoring.
OMAS Community Relations Manager	<ul style="list-style-type: none"> Development, implementation and monitoring of OMAS Social Management System. Communication of the Social Management System throughout OMAS. Ensure all incident reporting and social performance requirements are met. Undertake all internal social reporting for the Project. Review and assess monthly contractor monitoring.
OMAS Project Construction Manager (during construction)	<ul style="list-style-type: none"> Responsible for adherence to HSE aspects during construction of the mine, and compliance with OMAS HSE and Social policies. Provide HSE and Social leadership to all operations team members and contractors.

Role	Responsibilities
OMAS Mine Operations Manager (once construction is complete)	<ul style="list-style-type: none"> Responsible for adherence to HSE aspects during operation of the mine, and compliance with OMAS HSE and Social policies. Provide HSE and Social leadership to all operations team members and contractors.
OMAS Training Coordinator	<ul style="list-style-type: none"> Responsible for all HSE and Social induction and training needs for all personnel (including contractors) and visitors.
OMAS Personnel	<ul style="list-style-type: none"> Complete required HSE and Social induction and training. Comply with OMAS HSE and Social requirements and procedures.
Contractors & Sub-Contractors	<ul style="list-style-type: none"> Comply with OMAS HSE and Social requirements in accordance with the conditions of the Contract.

The senior management structure of OMAS, setting out key areas of responsibility is set out in Figure 4 below.

Figure 4: OMAS Senior Management Structure



The structure of Health, Safety, Environment and Training; and External Affairs and Sustainability departments are set out below.

Figure 5: OMAS Health, Safety, Environment and Training Structure

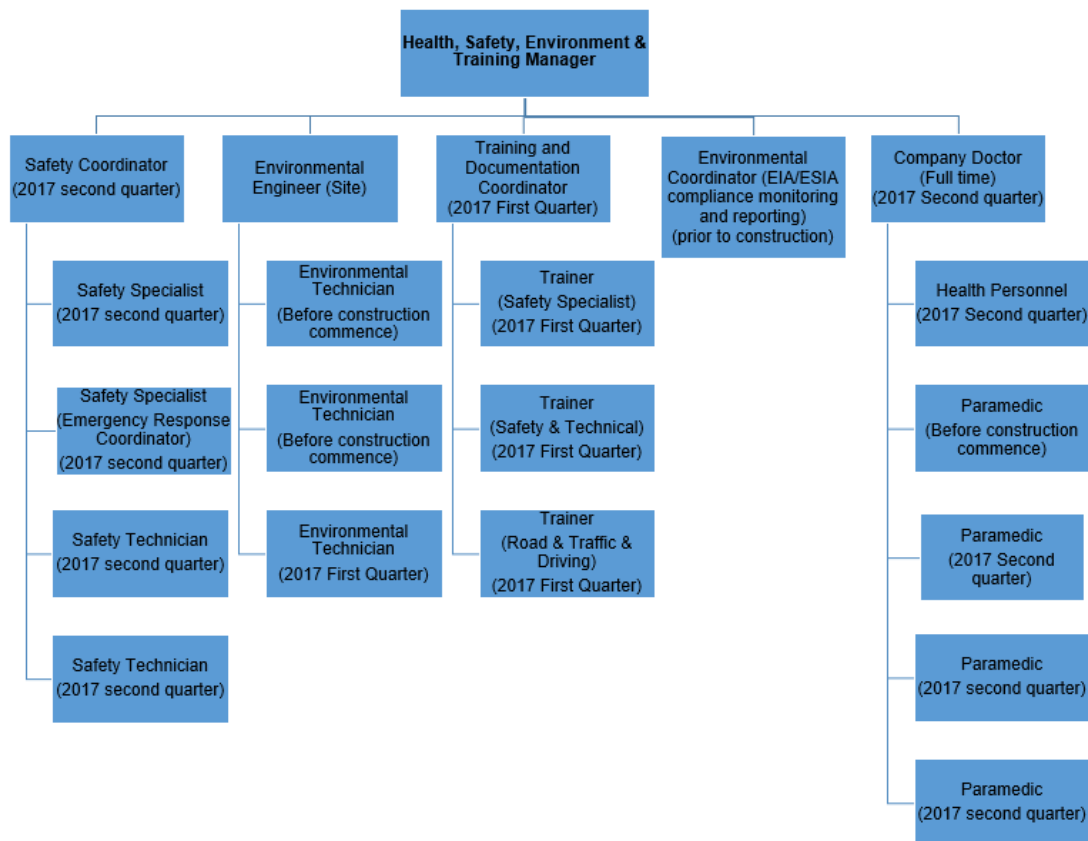
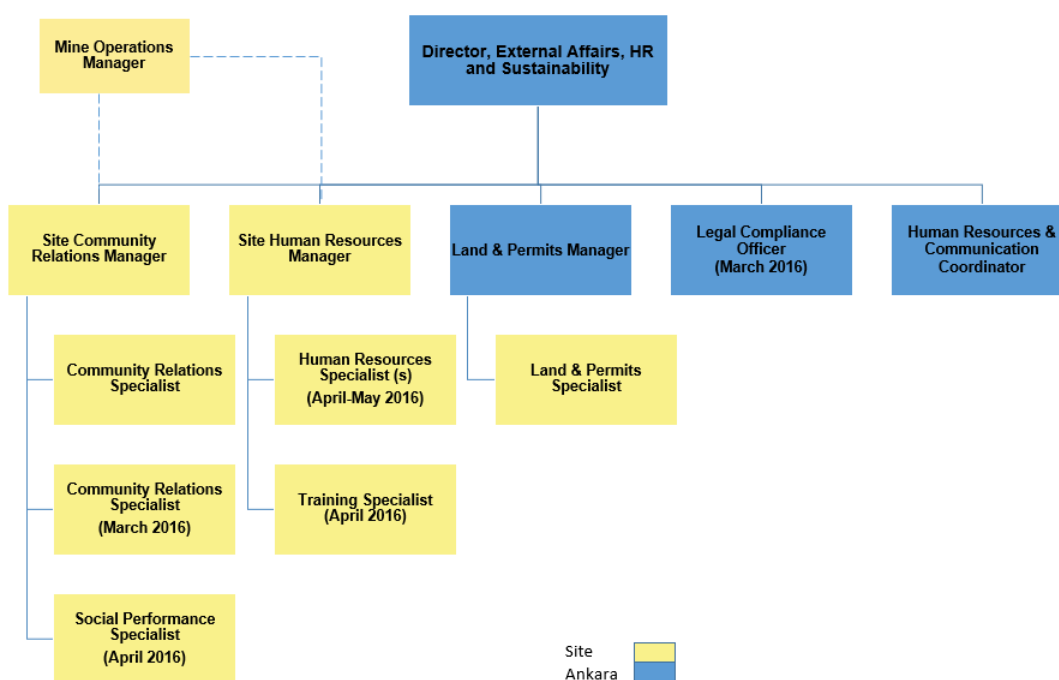


Figure 6: OMAS External Affairs and Sustainability Department



3. Project Standards

OMAS is committed to meeting Project Standards as part of this Management System. Project Standards are defined as:

- The laws and regulations of Turkey.
- Turkish regulatory permit and licence conditions applicable to OMAS.
- Good international industry practice as defined by EBRD Environmental & Social Performance Requirements.
- OMAS HSE and Sustainability Policies (attached as *Annex B*).

Project Standards will be applicable during all phases of construction, operation and closure.

Where a conflict exists between Turkish requirements and good international industry practice, the more stringent standard or requirement will be applied in order to ensure compliance with legal requirements at all times.

4. Monitoring

Monitoring requirements are defined within each component of the Management System and reflect the requirements of Project Standards.

Where any limits are exceeded (e.g. emissions limits) or non-compliances noted, the Management System requires that these exceedances or non-compliances are recorded, reported and investigated.

Recommended actions from the review of monitoring results are documented, accountability for follow-up assigned and actions are tracked until completion.

4.1 Key Performance Indicators

Key Performance Indicators (KPIs) are set out to measure the effectiveness of implementation of this Management System. Specific KPIs are also defined to assess the effectiveness of specific control measures set out within the Management System (under Component 8).

4.2 Performance Tracking

OMAS HSE and Social performance will be tracked in the following reports:

- Monthly Departmental (HSE and Social) reports to Senior OMAS Management.
- Monthly progress reporting to Centerra.
- Quarterly CSR and Sustainability report to Centerra
- Quarterly Health and Safety report to Centerra.
- Annual reporting in disclosed Centerra Annual Progress Report.
- HSE permit compliance reporting to relevant government Departments (every 6 months) during operation.

5. OMAS HSE and Social Management System

The key components of the management system are outlined in Table 2 below.

Table 2: Key Components of the Management System

Activity	Component
“Plan”	1: Policy & Compliance
	2: Risk Assessment & Management
	3: Objective & Target-Setting
“Do”	4: Organisation, Accountabilities & Responsibilities
	5: Competency & Training
	6: Communication & Consultation
	7: Management of Change
	8: Operational Control of the ESMS Framework
	9: Emergency Preparedness
	10: Supplier & Contractor Management
“Check”	11: Monitoring & Evaluation
	12: Non-Conformance, Incident and Action Management
“Act”	13: Management Review

Each component is described and defined below.

5.1 Component 1 – Policy & Compliance

Objective

Define and comply with all HSE and Social policy and legal and permitting requirements.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- Establish and implement OMAS HSE and Sustainability (Social) policies in line with Centerra policies.
- Ensure policies are communicated internally and disclosed externally.
- Establish and manage a Commitments Register to include legal, permitting and other requirements and update by periodic review.

The OMAS External Affairs & Sustainability Director is responsible for implementation of this Component.

Additional Documents

- Centerra HSE and Sustainability (Social) policies.
- OMAS HSE and Sustainability (Social) policies.
- OMAS Commitments Register.

5.2 Component 2 – Risk Assessment and Management

Objective

To identify, assess and manage HSE and Social risks.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- Establish hazard and risk management procedure to address all HSE and Social issues, including pre-task hazard assessments, qualitative risk assessments and quantitative risk assessments.
- Document risks and actions according to a defined risk classification within OMAS Risk Register.
- Develop plans to manage identified risks.
- Document the close-out of risk management actions through quarterly review of Risk Register.

The OMAS External Affairs & Sustainability Director is responsible for implementation of this Component.

Additional Documents

- Risk Management Procedure.
- Risk Register.

5.3 Component 3 – Objective and Target Setting

Objective

To set objectives and processes for continual improvement planning in HSE and Social management.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- Annual review of HSE and Social performance to be undertaken against targets and objectives set out in Commitments Register
- Annual improvement plans to be developed and integrated into overall annual business planning processes.
- Annual reviews of all staff to include HSE and Social performance.
- Reward and incentive schemes will be dependent upon HSE and Social performance, rather than allowing any compromise in order to maximize financial reward.

The OMAS External Affairs & Sustainability Director is responsible for implementation of this Component.

Additional Documents

HSE and Social performance assessment and improvement planning procedure

5.4 Component 4 – Organisation, Accountabilities and Responsibilities

Objective

To ensure that resources and responsibilities are appropriately allocated to implement and continually improve HSE and Social management.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- Senior OMAS management representative identified and given responsibility for implementation of the HSE and Social Management System, including resource allocation.
- HSE and Social Management Committees established and Terms of Reference for their activities documented.
- HSE and Social roles and responsibilities documented.
- An HSE and Social organizational chart is prepared and made available to all employees.
- All HSE and Social responsibilities are documented in individual role/job descriptions.
- Contractor HSE and Social roles and responsibilities to be documented in contracts.

The OMAS General Manager is responsible for implementation of this Component.

Additional Documents

- HSE and Social organization chart.
- Terms of Reference for HSE and Social Management Committees.
- HSE and Social roles and responsibilities.

5.5 Component 5 – Competency and Training

Objective

To establish processes to provide the necessary training and competency to manage HSE and Social risks.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- OMAS HSE and Social training needs assessment undertaken on an annual basis.
- HSE and Social training requirements and plans identified and implemented for all personnel.
- HSE and Social induction training for new personnel (including contractors).
- HSE and Social induction training for visitors.
- Specific competency requirements and selection criteria (fitness for work) for all personnel performing tasks and work activities containing significant HSE and Social risks.
- All roles requiring technical certification, registration or licensing to be documented.
- HSE and Social awareness training to be provided to all staff on an annual basis as a minimum.
- Records of all induction, awareness and competency-based training to be retained.

The OMAS Training and Documentation Coordinator is responsible for implementation of this Component.

Additional Documents

- Annual OMAS HSE and Social training needs assessment
- Individual HSE and Social training plans and records

- HSE and Social induction training
- HSE and Social general awareness training
- HSE and Social training records (including all contractors).

5.6 Component 6 – Communication and Consultation

Objective

To engage effectively with staff, contractor personnel and external stakeholders on the management of HSE and Social risks.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- Define process for communication with all workers on HSE and Social issues.
- Ensure all workers are made aware of HSE and Social issues and opportunities to participate in HSE and Social matters.
- Establish regular communication channels to all workers on HSE and Social issues. This includes but is not limited to:
 - Internal awareness raising.
 - Awareness of HSE and Social risks.
 - Pre-start meetings.
 - Lessons learnt from accidents, incidents and near-misses.
 - External stakeholder concerns, complaints and grievances.
- Define procedures for engagement with external stakeholders on relevant HSE and Social issues including periodic disclosure of HSE and Social performance, including an Annual Sustainability Report.
- Establish a process for encouraging and receiving suggestions from workers.
- Establish a procedure for receiving and responding to worker questions, complaints and grievances in a confidential manner.
- Establish a procedure for receiving and responding to external stakeholder questions, complaints and grievances.

The OMAS External Affairs & Sustainability Director is responsible for implementation of this Component.

Additional Documents

- Internal communications procedures.
- Stakeholder Engagement Plan.
- Employee Grievance Procedure.
- Grievance Procedure.

5.7 Component 7 – Management of Change

Objective

To manage the HSE and Social risks associated with any change to business processes.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- Establish Management of Change Procedure to identify and manage changes to any business process that may impact HSE and Social performance based on a risk assessment.
- Establish procedure to notify regulators and other key stakeholders (such as Lenders) about proposed changes and secure agreement prior to implementing the change.

The OMAS External Affairs & Sustainability Director is responsible for implementation of this Component.

Additional Documents

- Management of Change Procedure

Lender Notification of Proposed Changes

Where a material change to the Project, the Project Standards or Management Plans is required, external stakeholders, including Project Lenders will be notified, as set out below.

Table 3: Lender Group Change Notification Requirements

Impact Category	Impact Description	Action Required
Category 3	<p>Changes which are reasonably likely to result in:</p> <ul style="list-style-type: none"> (i) a significant departure from the Project Description (see ESIA <i>Chapter 5: Project Description</i>) and/or the Project Standards; (ii) new significant environmental and/or social impact(s) not identified in the ESIA; (iii) significant environmental and/or social impact(s) identified in the ESIA in respect of which the mitigation measures in the Management Plans (and Implementing Documents) are not or are not reasonably likely to be effective; or (iv) material amendment(s) or supplement(s) to the Management Plans (and Implementing Documents). <p>To avoid doubt, an alteration or deletion of any positive undertaking or specific prohibition which comprises an avoidance or mitigation action required to manage impacts identified in the</p>	<p>The Company will notify the Lender Group of all proposed Category 3 Changes (“Notice of Change”) in accordance with the procedure that has been agreed between the Project Lenders and the Company. The Notice of Change will include such details are required by that procedure, and the implementation of such Change will be subject to that procedure.</p>

Impact Category	Impact Description	Action Required
	ESIA will be considered material.	
Category 2	Changes which have the potential to or are reasonably likely to result in: (i) a departure from the Project Description (see ESIA <i>Chapter 5: Project Description</i>) and/or the Project Standards; (ii) new environmental and/or social impact(s) not identified in the ESIA; or (iii) significant environmental and/or social impact(s) identified in the ESIA but in respect of which no material amendment(s) or supplement(s) to the operations-phase environmental and social management plans are required.	The Company will notify the Lender Group of all proposed Category 2 Changes in accordance with the procedure that has been agreed between the Project Lenders and the Company. The Notice of Change will include such details are required by that procedure, and the implementation of such Change will be subject to that procedure.
Category 1	Changes which do not fall within either Category 2 or Category 3.	Notification of the Change(s) to the Lender Group through annual Project Reporting.

5.8 Component 8 – Operational Control of the ESMS Framework

Objectives

To manage HSE and Social risks associated with OMAS operations by implementation of HSE and Social Management Plans and Commitments Register to control risks to As Low As Reasonably Practicable.

To set out and document the key requirements and processes required for the effective operation of the Management System.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

Management Plans will be developed for the key HSE and Social issues as outlined in Figure 7 below. The Worker Health & Safety Management Plan is under preparation by OMAS and will be implemented prior to the commencement of construction activities. The OMAS Worker Health & Safety Framework is set out in *Annex C* to set out the key commitments and objectives to be implemented by OMAS.

Figure 7: HSE and Social Management Plans



Management Plan commitments will be tracked and managed through a Commitments Register which will be subject to regular internal review and updates.

The OMAS External Affairs & Sustainability Director is responsible for implementation of the Social Management part of this Component. The HSE&T Manager is responsible for implementation of the Health, Safety and Environment parts of this Component.

Additional Documents

- HSE and Social Management Plans.
- Commitments Register.

5.9 Component 9 – Emergency Preparedness

Objective

To ensure that adequate measures to protect worker and community health and safety and the environment are implemented in the event of an emergency.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

Establish an Emergency Preparedness and Response Plan (including cyanide management).

Implement and test the Emergency Preparedness and Response Plan.

- Annual desktop exercise.
- Full-scale exercise every two years.

Ensure personnel are appropriately trained.

Ensure Plan is developed in consultation with local emergency services and local authorities.

The OMAS HSE&T Manager is responsible for implementation of this Component.

Additional Documents

- Emergency Preparedness & Response Plan.
- Cyanide Management Plan (prepared in conjunction with the selected Cyanide supplier who will be certified under the International Code on the Management of Cyanide).

5.10 Component 10 – Supplier and Contractor Management

Objective

To ensure HSE and Social risks associated with procurement, equipment, services and labour are effectively managed.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- Establish procedure to assess HSE and Social risks related to planned procurement of materials, equipment, services and labour.
- Establish procedure to ensure that HSE and Social requirements are set out in tender specifications or design criteria.
- Establish procedure to define criteria for supplier and contractor selection based on defined HSE and Social requirements.
- All materials, equipment, services and labour must meet the required specifications for the control of HSE and Social risks.
- Establish an inventory of hazardous materials that are approved for use onsite.
- Legally compliant Material Safety Data Sheets (MSDS) must be available prior to the delivery and use of hazardous materials.
- Establish contractor management procedures including training and monitoring related to HSE and Social risks.

The OMAS Finance and Administration Director is responsible for implementation of this Component.

Additional Documents

- Procurement procedures (to include HSE and Social risk assessment, specification and evaluation requirements).
- Hazardous materials inventory.
- Contractor management procedures.

5.11 Component 11 – Monitoring and Evaluation

Objective

To assess hazards or the impact of OMAS's activities and evaluate the effectiveness of management controls.

To monitor the workplace and environmental performance to assess conformance and compliance.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- Establish procedure for Health & Safety performance monitoring, data evaluation and improvement planning.
- Establish medical surveillance programme for workers.
- Establish procedure for Environmental performance monitoring, data evaluation and improvement planning.

- Establish procedure for Community Relations performance monitoring, data evaluation and improvement planning.
- Establish procedure for periodic performance reporting to Centerra.
- Establish procedure for annual reporting to external stakeholders (Annual Sustainability Report).

The OMAS HSE&T Manager is responsible for implementation of this Component.

Additional Documents

- Health & Safety monitoring procedures.
- Medical surveillance programme.
- Environmental Monitoring and Measurement Procedure (OMAS-HSEC-PRC-001).
- Community Relations monitoring procedures.

5.12 Component 12 – Non-Conformance, Incident and Action Management

Objective

To ensure that all non-conformances, incidents and lessons learnt are recorded and corrective actions identified and communicated.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- All non-conformances, incidents and near misses must be investigated to a level commensurate with the potential risk or outcome, to include lessons learnt and improvement recommendations.
- All incidents must be reported on the same work day on which it occurs.
- Depending on the actual consequences and maximum reasonable outcome of the impact, relevant internal and external parties must be notified in accordance with established timeframes and legal requirements.
- All incidents causing personal injury or personal illness must be reported to Centerra in monthly performance statistics.
- Establish incident management procedure, including reporting and notification requirements.

The OMAS HSE&T Manager is responsible for implementation of this Component.

Additional Documents

- Safe Operations Policy.

5.13 Component 13 – Management Review

Objective

To ensure that the OMAS Management System is efficient and effective in managing HSE and Social performance and meeting Centerra requirements.

Scope

All OMAS activities throughout the life of the business.

Procedure and Responsibility

- Establish procedure for undertaking an annual review of the performance and effectiveness of the Management System to be led by OMAS senior management.
- Ensure that findings from audits are considered and included in relevant performance improvement plans.

The OMAS General Manager is responsible for implementation of this Component.

Additional Documents

- Management System review procedure.

Annex A: Centerra Health & Safety Policy



HEALTH AND SAFETY POLICY

Centerra Gold Inc. recognizes the protection of the health and safety of its employees, contractors, and the public as vital to the Company's existence and continued development. Centerra Gold Inc. is committed to conducting all of its activities including exploration, operations and decommissioning in a responsible manner, providing a safe and healthy work environment for its' employees, contractors, visitors and the general public.

In support of this commitment, Centerra Gold Inc. will:

- Assign health and safety responsibilities and accountabilities to each level of the organization.
- Establish and maintain systems which will strive to identify, control or eliminate health and safety risks.
- Ensure the mitigation of health and safety risks when evaluating, planning, constructing and managing all projects and operations.
- Meet or exceed local, regional and national health and safety legislation.
- Require senior management of each operation and subsidiary to be accountable for the establishment, maintenance and implementation of documented site programs, plans and procedures in a manner consistent with this policy.
- Require Centerra Gold Inc. managers, supervisors and employees to adhere to this policy in identifying, assessing and mitigating health and safety risks.
- Ensure Centerra Gold Inc. employees and contractors have the appropriate training so as to allow them to appropriately carry out their health and safety duties and responsibilities.
- Ensure the participation of Centerra Gold Inc. employees in the development and implementation of health and safety programs and procedures.
- Communicate this policy to all Centerra Gold Inc. stakeholders so they are aware of their health and safety responsibilities in a manner appropriate to their role in the organization, and encourage them to make contributions to Centerra's safety, health and safety management system.
- Provide adequate and appropriate resources to implement this policy.
- Monitor and conduct regular assessments in the management of our operations so as to achieve continual improvement in health and safety performance that is aligned with leading international industry practices.



The Board of Director's Operations and Sustainability Committee will review this policy bi-annually.



Ian Atkinson,
CEO, Centerra Gold Inc.

Date: January 01st, 2015

Annex B: OMAS Sustainability Policy


 SUSTAINABILITY POLICY		
Department: Corporate	Effective Date: February 1, 2015 Revision: Final	Policy No: 002
Management Responsibility:	All Company Employees and Subcontractors' Employees	Author: Corporate Author:
Approved by: Mike Fisher General Manager		

We Believe

- Mining is a positive force for social and economic development.
- We have a responsibility to develop and maintain constructive relationships with host communities.
- Two-way engagement and dialogue will build trust and foster genuine collaboration with local stakeholders.
- We have a responsibility, together with local government and other partners, to mitigate the negative impacts of our operations and to capitalize on opportunities to enhance sustainable socio-economic development.
- Cultural sensitivity, respect and integrity are central to the way we do business and behave as individual employees.
- As a company we are accountable for our actions.

We Promise

- To listen to and engage with host communities in a collaborative, transparent manner to build mutual trust and understanding.
- To work proactively with communities to identify and manage social risks, impacts and obligations.
- To help foster a stable, healthy and safe environment in which to live and work.
- To develop partnerships with host communities, governments, employees, contractors and others to promote sustainable social and economic development.
- To respect the fundamental human rights of all stakeholders with whom we interact.
- To manage grievances in a fair, timely and consistent manner.
- To take into account the special aspirations, needs and concerns of Indigenous Peoples, women, children and vulnerable groups within our sphere of influence.
- To leave a lasting positive legacy by working with local stakeholders to prepare for our eventual departure and the closure of our operations.
- To monitor and continually seek to improve our community relations performance in order to create value for our stakeholders and shareholders alike.

 <h2 style="text-align: center;">HEALTH, SAFETY AND ENVIRONMENTAL POLICY</h2>		
Department: Corporate	Effective Date: February 1, 2015 Revision: Final	Policy No: 001
Management Responsibility:	All Company Employees and Subcontractors' Employees	Author: Corporate Author:
Approved by:	Mike Fisher General Manager	

The ÖKSÜT Gold Company (OMAS) recognizes the protection of the health and safety of its employees, contractors, the public, and the environment as among the highest corporate priorities at all stages of our activities including exploration, construction, operations and decommissioning, and is committed to the safety motto that “no job is so important that we cannot take the time to do it safely” and to the following:

- compliance with applicable laws and regulations of the jurisdictions in which we operate, and generally accepted international industry practices;
- providing employees and contractors with a working environment free of uncontrolled hazards;
- identifying and eliminating or controlling potential risks to health and safety of employees, contractors and the public to levels as low as reasonably achievable, social and economic factors being taken into account;
- prevention of pollution and control of the impacts of our activities on the environment to levels as low as reasonably achievable; and
- achieving continual awareness of and improvement to our overall safety, health and environmental performance.

In support of these commitments, OMAS will:

- implement and maintain a formal health, safety and environmental management system;
- identify the significant health and safety hazards and risks associated with our activities;
- set objectives and targets so as to improve continually our health, safety and environmental management and performance;
- identify the potential for incidents, and emergency situations and develop, maintain and test emergency response plans which provide for the protection of the environment, the health and safety of our employees, the public, and the communities adjacent to our operations;
- undertake constructive dialogue with the communities located near our operations regarding safety issues;
- handle and dispose of our wastes responsibly to avoid, reduce or control pollution;
- decommission and reclaim our sites in a planned and timely manner;
- conduct regular audits to assess and ensure conformance to this policy;
- engage in constructive communication of this policy with all employees and relevant contractors and suppliers so they are aware of, and able to comply with their health, safety and environmental responsibilities in a manner appropriate to their role in the organization, and to encourage them to make contributions to OMAS's health, safety and environmental management;
- provide employees at all levels with appropriate training so as to allow them to carry out their health, safety and environmental duties and responsibilities;
- ensure the participation of employees in the development and implementation of health, safety and environmental programs and procedures associated with their work places;
- provide adequate and appropriate resources to implement this policy; and
- make this policy available to the public.

Annex C: OMAS Worker Health & Safety Framework

Introduction

As part of the development of the Öksüt Project, OMAS is moving from exploration to construction and operations. Worker health and safety management systems are in place for exploration activities and more detailed management systems and operating procedures are under development for construction and operations.

Objectives of this Framework

This Framework sets out:

- The requirements and standards to which the OMAS Worker Health & Safety Management System (HSMS) will comply;
- The management control framework that will be developed and implemented, based on existing Centerra Standards and guidelines;
- Monitoring and reporting procedures;
- The process for the development of the HSMS.

Compliance Framework

OMAS will comply with all applicable Turkish worker health and safety legislation, specifically the Law on Turkish Occupational Health and Safety (Law No 6331 of 2012) (OHS Law). Following accidents at Ovacikin in 2014, Turkish health and safety legislation is currently under review and as part of this process on 23 March 2015, Turkey ratified the ILO Safety and Health in Construction Convention, 1988, (No. 167) and the Safety and Health in Mining Convention, 1995 (No. 176) on 23 March 2015.

EBRD PR 4: Health and Safety defines EBRD requirements related to health and safety. Key elements related to occupational health and safety are summarised below.

Table 1: Key Applicable Requirements of EBRD PR4

Para	Key Requirements
9	The client will take steps to identify and prevent accidents, injury and disease to workers and affected communities arising from or associated with, or occurring in the course of the project activities and prepare and implement preventative measures and plans to manage health and safety risks in accordance with the mitigation hierarchy approach and GIP.
10	The client will provide workers and affected communities with relevant information, guidance and training relating to health and safety hazards, risks, protective and preventive measures and emergency arrangements that are necessary for their safety throughout the project.
11	Where any accident, injury and disease arises or occurs in the course of works associated with the project, or there is a potential of such event, the client will investigate, document and analyse the findings and adopt measures to prevent reoccurrence and, where required by law, notify and cooperate with the relevant authorities.
12	The client will provide workers with a safe and healthy workplace, taking into account inherent risks in its particular sector and specific classes of hazards that may be present. The client will identify the health and safety risks and protection measures appropriate to the stage, size and nature of the project in accordance with relevant substantive EU Occupational Health and Safety (OHS) standards ¹ and GIP. The client will develop a project-specific health and safety plan, where appropriate, that will be integrated into the ESMS.
13	The client will implement occupational health and safety measures that will provide: (i) preventive and protective measures, including modification, substitution or elimination of hazardous conditions or substances; (ii) equipment to minimise risks, and require and enforce its use; (iii) personal protective

	equipment at no cost to the workers; and (iv) training to workers to use and comply with health and safety procedures and protective equipment. The client will require its non-employee workers, contractors and other third parties engaged to work on project sites or perform work directly related to the core functions of the project to comply with the health and safety plan.
14	During the course of any work activity the client will ensure that all workers are provided with continued and appropriate supervision to ensure adequate implementation, maintenance and enforcement of the health and safety measures.
15	The client will monitor the health of its workers and consult and encourage the workers to participate in matters related to health and safety in the workplace. This shall include, although not be limited to, accident investigation, risk assessment and selection of work.
16	Where there are specific risks associated with certain work activities that could result in adverse effects on the health and safety of workers with sensitivities such as age, gender, disability or short- or long-term health conditions, the client will carry out a risk assessment and make adjustments to prevent injury and ill health.

EBRD PR4 requires the identification and management of occupational health and safety risks in accordance with relevant substantive EU Occupational Health and Safety Standards. These standards are set out below.

Table 2: Substantive EU Occupational Health & Safety Standards

Topic	Relevant EU Directives
OSH Framework Directive	Directive 89/391 - OSH "Framework Directive"
Workplaces, equipment, signs, personal protective equipment	Directive 2009/104/EC – use of work equipment Directive 99/92/EC - risks from explosive atmospheres Directive 92/58/EEC - safety and/or health signs Directive 89/654/EEC - workplace requirements Directive 89/656/EEC - use of personal protective equipment
Exposure to chemical agents and chemical safety	Directive 2009/161/EU - indicative occupational exposure limit values Directive 2009/148/EC - exposure to asbestos at work Directive 2006/15/EC - indicative occupational exposure limit values Directive 2004/37/EC - carcinogens or mutagens at work Directive 2000/39/EC - indicative occupational exposure limit values Directive 91/322/EEC - indicative limit values
Exposure to physical hazards	Directive 2013/59/Euratom - protection against ionising radiation Directive 2013/35/EU - electromagnetic fields Directive 2006/25/EC - artificial optical radiation Directive 2003/10/EC - noise Directive 2002/44/EC - vibration Directive 96/29/Euratom - ionizing radiation Directive 90/641/Euratom - outside workers in controlled areas (ionizing radiation)
Exposure to biological agents	Directive 2000/54/EC - biological agents at work
Provisions on workload, ergonomical and psychosocial	Directive 90/270/EEC - display screen equipment

risks	Directive 90/269/EEC - manual handling of loads
Sector specific and worker related provisions	<p>Directive 92/104/EEC - mineral-extracting industries (on the minimum requirements for improving the safety and health protection of workers in surface and underground mineral-extracting industries)</p> <p>Directive 92/91/EEC - mineral-extracting industries – drilling (on the minimum requirements for improving the safety and health protection of workers in the mineral-extracting industries through drilling)</p> <p>Directive 92/57/EEC - temporary or mobile construction sites (on the implementation of minimum safety and health requirements at temporary or mobile construction sites)</p>

Existing Management Control Framework

Centerra has developed a clear management control framework for the management of worker health and safety (employees and contractors). This includes:

- Centerra Contractor Safety Management Standard
- Critical Safety Risks Standards:
 - Operation of Mobile Equipment
 - Cranes and Lifting
 - Release of Hazardous Energy
 - Working at Heights
 - Handling of Hazardous Materials.

In addition, OMAS has developed a Safe Operating Procedure – Minimum HSE Operating Requirements (SOP-HSES-001) for use during the exploration (and pre-construction) phase of the Öksüt Project.

Monitoring and Reporting

OMAS currently monitors health and safety performance in line with Turkish legal requirements and Centerra reporting requirements. Monthly reporting is undertaken for leading and lagging indicators as outlined below.

Table 3: OMAS Health & Safety Indicators Reported on a Monthly Basis

Leading Indicators Reported	Lagging Indicators Reported
<ul style="list-style-type: none"> • Number of hazards identified • Planned safety meetings • Scheduled inspections • Near misses reported • Number of training hours delivered 	<ul style="list-style-type: none"> • Hours worked (employees and contractors) • Lost time injury frequency rate (per 200,000 hrs worked) • Injury severity rate • Recordable incident frequency rate • Environmental incident frequency rate • Property damage frequency rate • Total incidents

In addition, OMAS prepares a monthly hazard and near miss report (including corrective actions) to Centerra.

Development of Worker Health & Safety Management Plan

OMAS and Centerra have developed an HSE and Social Framework to guide the development of the construction and operations HSMS. This sets out the following contents for the HSMS:

- **Leadership and personal commitment**
 - Personal commitments
 - Internal responsibility system (IRS)
 - Accountability
- **Training and competence**
 - Training needs and assessment
 - Induction/Orientation
 - Legislated training
 - Competency training
- **Risk management**
 - Project, operational and closure-specific risk assessments
 - Hazard identification
 - Workplace inspections
 - Change management
 - Training
- **Operational controls (SOPs)**
 - Project, operational and closure-specific work procedures
 - Task-specific training
- **Occupation health and wellness**
 - Industrial hygiene
 - Occupational health
 - Personal Wellness
 - Fatigue management
 - Job-specific training
 - Measuring, monitoring and reporting
- **Contractor controls**
 - Pre-project selection criteria
 - Contractor health and safety plans
 - Supervision and ownership
 - Post-project reviews
 - Training and competency

- **Incident investigation**
 - Reporting and notification of health & safety incidents and injuries
 - Investigating to root cause
 - Corrective actions
 - Incident awareness and communication
 - Specific training
- **Emergency preparedness**
 - Response needs assessment
 - Mutual aid agreements with local and regional authorities
 - Resources and equipment
 - Reporting and notification of incidents
 - Emergency response training and competency
- **Performance measurement and assessment**
 - Occupational health and safety governance and reporting
 - Occupational health and safety auditing

The OMAS HSMS will be developed and implemented prior to the commencement of on-site construction activities.

Annex D: OMAS Policies, Plans and Procedures

Table 1: ESMS Documents

Name	Document #
Air Emissions Management Plan	OMAS-ESMS-AE-PLN- 001
Biodiversity Management Plan	OMAS-ESMS-BIO-PLN-001
Biodiversity Offset Strategy	OMAS-ESMS-OFF-PLN-001
Community Health, Safety and Security Management Plan	OMAS-ESMS-CHSS-PLN-001
Community Development Framework	OMAS-ESMS-CD-PLN-001
Conceptual Mine Closure Framework	OMAS-ESMS-CP-PLN-001
Contractor Management Framework	OMAS-ESMS-CM-PLN-001
Cultural Heritage Management Plan	OMAS-ESMS-CH-PLN-001
Cyanide Management Framework	OMAS-ESMS-CY-PLN-001
Emergency Response Plan	OMAS-ESMS-ERP-PLN-001
Hazardous Materials Management Plan	OMAS-ESMS-HM-PLN-001
Labour Management Plan	OMAS-ESMS-LM-PLN-001
Livelihood Restoration Framework	OMAS-ESMS-LR-PLN-001
Mineral Waste Management Plan	OMAS-ESMS-MW-PLN-001
Noise and Vibration Management Plan	OMAS-ESMS-NV-PLN-001
Non Mineral Waste Management Plan	OMAS-ESMS-NMW-PLN-001
Security Management Plan*	*
Stakeholder Engagement Plan	OMAS-ESMS-SEP-PLN-001
Transport Management Plan	OMAS-ESMS-TMP-PLN-001
Water Resources Management Plan	OMAS-ESMS-WR-PLN-001

*Security Management Plan will be developed but will not be disclosed

Note: Cyanide Management Plan to be prepared by OMAS in conjunction with the selected cyanide supplier in conformance with International Cyanide Management Code requirements.

Table 2: OMAS Policies & Procedures Documents

Document #	Name	Effective Date
OMAS-GEN-POL-001	Code of Ethics Policy	October 2015
OMAS-GEN-POL-002	Whistle-blower and Reporting Policy	October 2015
OMAS-GEN-POL-003	Gifts and Hospitality Policy	August 2015
OMAS-HR-POL-001	HR Policy	October 2015
OMAS-HR-POL-002	Respectful Workplace Policy	October 2015
OMAS-HR-PRC-001	HR Policy and Procedure	October 2015
OMAS-HR-PRC-003	Employee Grievance Procedure	October 2015
OMAS-HR-PRC-004	Recruitment Policy and	October 2015

	Procedure	
OMAS-HR-PRC-004	Local Employment and Training Procedure	October 2015
OMAS-HR-PRC-005	Recruitment Procedure for Contractors	February 2015
OMAS-HSEC-POL-001	HSE Policy	February 2015
OMAS-HSEC-POL-002	Sustainability Policy	February 2015
OMAS-HSEC-POL-003	Community Conflict and Resolution Policy	February 2015
OMAS-HSEC-POL-004	Social Investment Policy	August 2015
OMAS-HSEC-PRC-001	Health Safety Procedure	October 2015
OMAS-HSEC-PRC-002	Risk Management Procedure	October 2015
OMAS-HSEC-PRC-003	Personal Protective Equipment (PPE) Procedure	October 2015
OMAS-HSEC-PRC-004	Accident Incident and Medical Evaluation Reporting Procedure	October 2015
OMAS-HSEC-PRC-005	Grievance Procedure	August 2015
OMAS-HSEC-PRC-006	Construction Impacts Management Procedure	August 2015
OMAS-HSEC-PRC-007	Cultural Heritage Management Procedure	August 2015
OMAS-HSEC-PRC-008	Traffic Management Plan	October 2015
OMAS-HSEC-PRC-009	Environmental Monitoring and Measurement Procedure	October 2015
OMAS-HSEC-PRC-010	Waste Management Procedure	October 2015
OMAS-FIN-PRC-001	Procurement of Goods and Services Policy and Procedure	September 2015
OMAS-FIN-PLN-001	Contractor Management Plan	To be Confirmed