

Öksüt Gold Mine Project ESIA Non-Technical Summary

For: Öksüt Madencilik Sanayi ve Ticaret A.Ş.
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1. Introduction

1.1 What is the Öksüt Gold Mine Project?

The Öksüt Gold Mine Project is a planned gold mine in the Central Anatolia region Turkey. It is owned and operated by Öksüt Madencilik Sanayi ve Ticaret A.Ş. (OMAS), which is a wholly-owned subsidiary of the international gold mining company Centerra Gold Inc. (Centerra).

There are estimated to be gold resources of 1.38 million ounces (39.1 tonnes) in two deposits (called Keltepe and Güneytepe). OMAS is planning to mine the gold-containing rock from open pits, and process it onsite in purpose-built facilities to produce gold doré bars. OMAS is also planning to build a new access road to the mine site, and a new powerline owned by TEİAŞ is being built to supply the mine with a reliable power source that will not affect local power supply.

OMAS envisages an initial capital investment of US\$221 million for the Öksüt Gold Mine Project. The Project is being financed by an international consortium of lenders, including the European Bank for Reconstruction and Development.

1.2 Where is the Öksüt Gold Mine Project?

The Project is located in the Central Anatolia region of Turkey and is 295 kilometres (km) southeast of the capital city of Ankara and 48 km directly south of the city of Kayseri. The nearest administrative centre is at Develi, located approximately 10 km north of the Project.

The area where the mine will be built is marked in red on the map in Figure 1 below, which also shows the access road, water supply pipeline and powerline. The Project is located in the Develi Mountains on a north-south trending mountain range, at an altitude of approximately 1,800 metres above sea level. The valleys below the mine site are farmed, with the local population living in a number of small neighbourhoods.

The neighbourhoods of Zile and Öksüt are closest to the Project and are both 4 km from the mine site. Other neighbourhoods that are close to Project facilities and their population are shown in Figure 2 below. The mine site is currently accessed via narrow agricultural roads from the local settlements.

Figure 1: Project Location

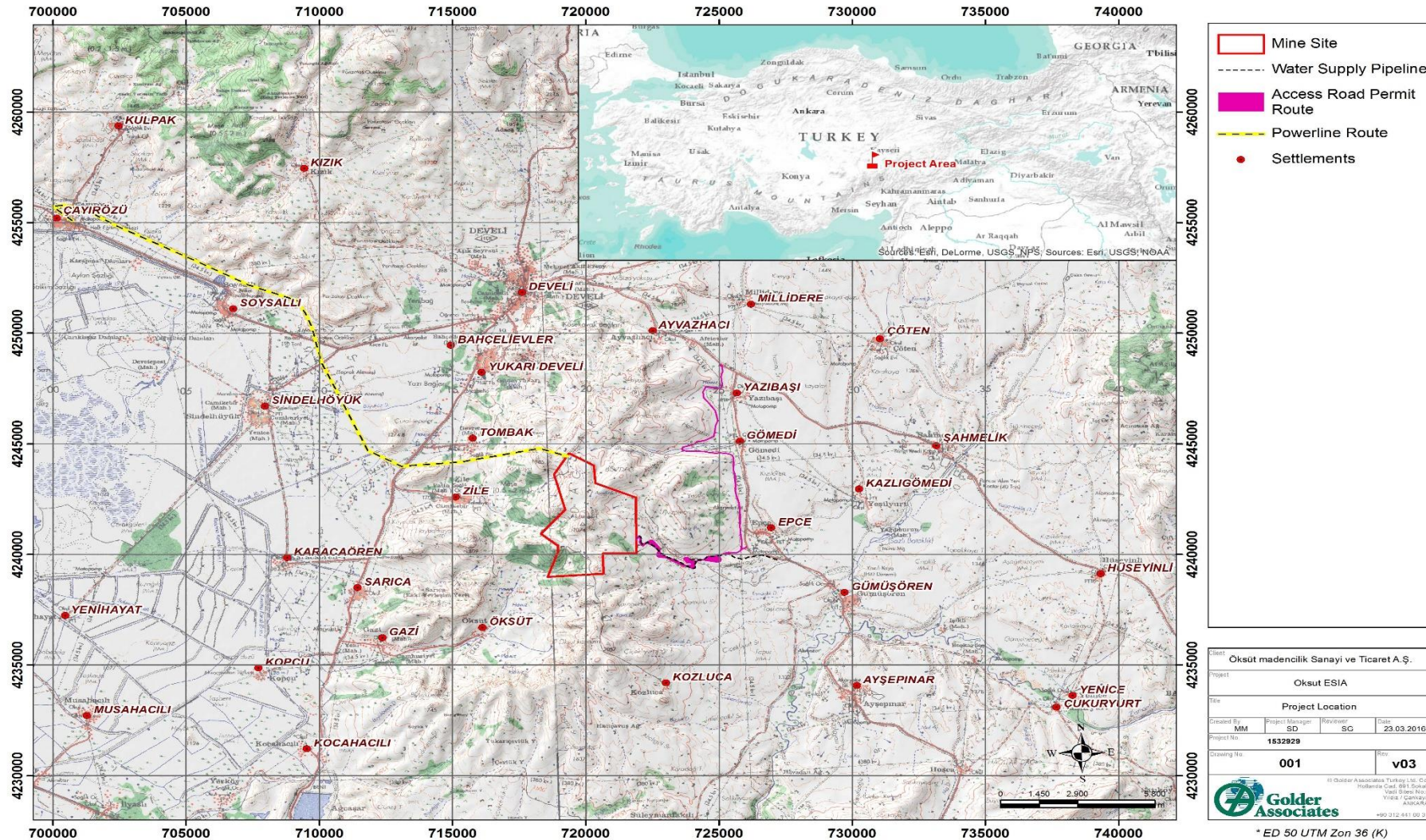
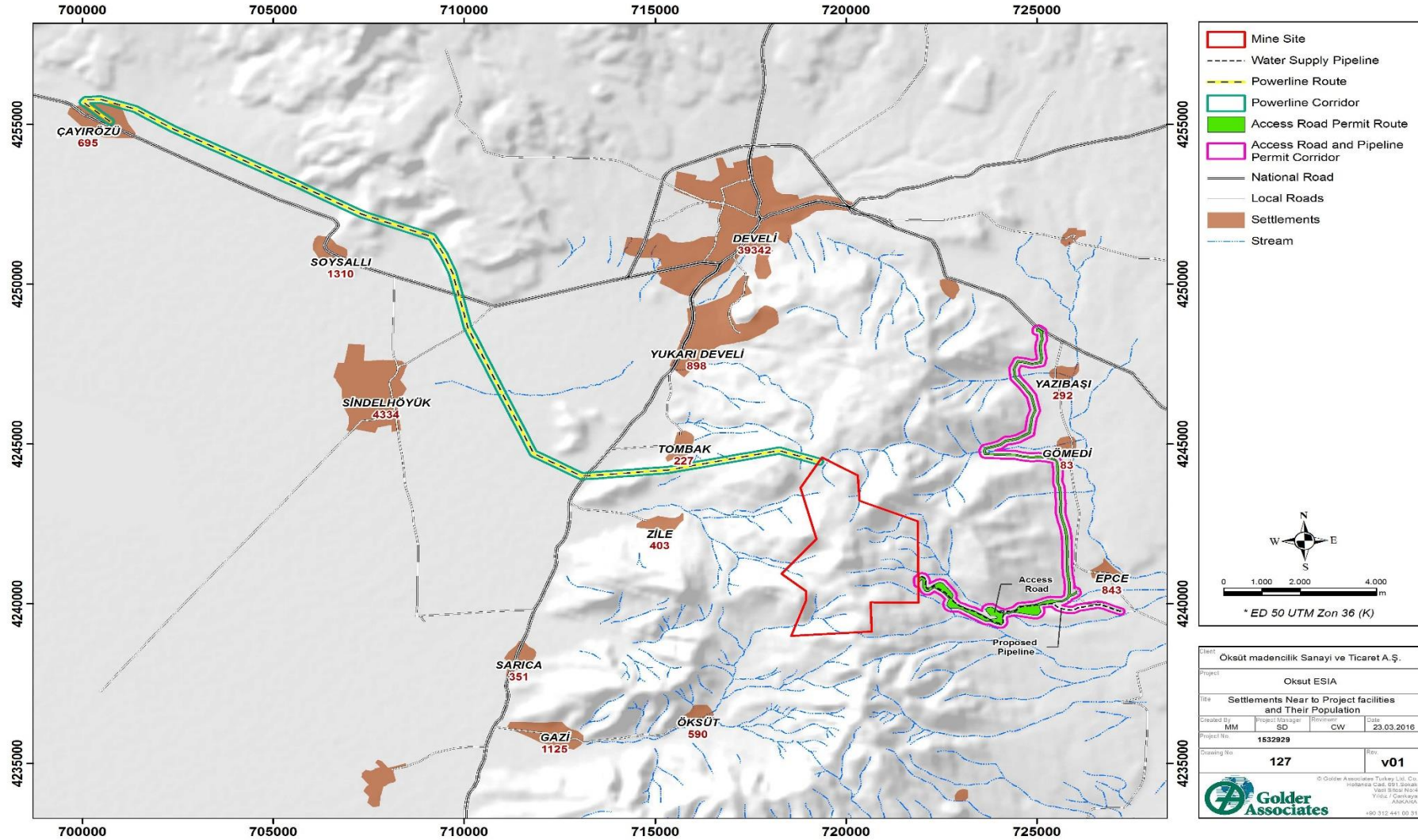


Figure 2: Settlements close to Project facilities and their population



1.3 What environmental and social studies have been undertaken?

A national environmental impact assessment for the Öksüt Gold Mine Project as part of the Turkish Permitting process (“the Turkish EIA”) was undertaken in 2014-15, and this was approved by the Ministry of Environment and Urban Planning. An environmental impact assessment certificate was granted on 9th November 2015.

In parallel with this, OMAS commissioned a socio-economic survey of the local area to provide a baseline against which socio-economic impacts and opportunities could be considered during the Project planning process. This has been used to put plans in place to minimize negative socio-economic impacts and maximize community benefits.

An environmental and social impact assessment (“ESIA”) was prepared between August 2015 and March 2016. The ESIA was prepared for OMAS by Citrus Partners LLP, an international environmental and social consultancy company, in conjunction with Golder Associates (Turkey) Ltd.

The ESIA uses information from a range of sources including the following:

- the Turkish EIA and social baseline, which were prepared for the Project by SRK Danışmanlık ve Mühendislik A.Ş.
- a number of additional environmental and social studies that were undertaken to fill the information gaps to meet international good practice. These studies included:
 - Additional biodiversity studies have been carried out by Professor Hayri Duman (Gazi University), Professor Abdullah Hasbenli (Gazi University), Professor Zafer Ayaş (Hacettepe University), Professor Yusuf Kumlutaş (Dokuz Eylül University) and Nilay Aygüney Berke (Kiana Biological and Environmental Consulting).
 - Additional studies on land use and livelihoods was provided by a team from the University of Ankara, including Prof. Dr. Harun Tanrivermiş, Prof. Dr. Nilay Çabuk Kaya, Prof. Dr. Metin Arslan, Dr. Yeşim Aliefendioğlu, Asst. Prof. Dr. Nihan Özdemir Sönmez and Asst. Prof. Dr. Arzuhan Burcu Gültekin.
 - Studies on the groundwater and geochemical modelling were undertaken by SRK Danışmanlık ve Mühendislik A.Ş.
 - Studies on archaeology were undertaken by Prof. Dr. S. Yücel Şenyrt, Dr. Atakan Akçay and Dr. Yalçın Kamiş from Gazi University Archaeology Department.
 - An Appropriate Assessment of biodiversity issues along the powerline, prepared by Golder Associates.

The environmental and social impact assessment is made up of the following chapters:

- Chapter 1 Introduction
- Chapter 2 Legal and Planning Policy Framework
- Chapter 3 Approach to Environmental and Social Assessment
- Chapter 4 Alternatives
- Chapter 5 Project Description
- Chapter 6 Stakeholder Consultation and Engagement
- Chapter 7 Air Quality
- Chapter 8 Biodiversity
- Chapter 9 Topography, Geology and Soils

- Chapter 10 Water Resources
- Chapter 11 Noise and Vibration
- Chapter 12 Landscape and Visual Amenity
- Chapter 13 Population and Society
- Chapter 14 Economics and Employment
- Chapter 15 Land Use and Ownership
- Chapter 16 Infrastructure and Services
- Chapter 17 Community Health, Safety & Security
- Chapter 18 Cultural Heritage and Archaeology
- Chapter 19 Cumulative Effects

The environmental and social impact assessment is supported by the OMAS Environmental and Social Management System, which OMAS uses to manage the environmental and social risks that are identified in the environmental and social impact assessment.

As part of its Environmental and Social Management System, OMAS has developed the following Management Plans and Frameworks:

- Air Emissions Management Plan
- Biodiversity Management Plan
- Biodiversity Offsets Strategy
- Community Health, Safety and Security Management Plan
- Community Development Framework
- Conceptual Mine Closure Framework
- Contractor Management Framework
- Cultural Heritage Management Plan
- Cyanide Management Framework
- Emergency Response Plan
- Hazardous Materials Management Plan
- Labour Management Plan
- Livelihood Restoration Framework
- Mineral Waste Management Plan
- Noise and Vibration Management Plan
- Non Mineral Waste Management Plan
- Stakeholder Engagement Plan
- Transport Management Plan
- Water Resources Management Plan

OMAS have also prepared a Biodiversity Action Plan (BAP) and Environmental and Social Action Plan (ESAP) which includes actions to structure the project in line with lender requirements and will form part of the loan agreements.

1.4 What is the purpose of this document?

This document is a non-technical summary, and it aims to describe the Öksüt Gold Mine Project, the key findings of the environmental and social impact assessment (ESIA) and outlines OMAS' approach to the management and monitoring of identified environmental and social issues.

1.5 Who has written this document for OMAS?

This non-technical summary has been prepared for OMAS by Citrus Partners LLP, an international environmental and social consultancy company, in conjunction with Golder Associates (Turkey) Ltd.

1.6 Where and when can I see the ESIA?

The ESIA, Management Plans and this non-technical summary were released by OMAS on the 8th April 2016 and are available for public review and comment for 60 days (until 7th June):

- on the OMAS website: <http://oksutmadencilik.com.tr>
- on EBRD's website: <http://www.ebrd.com/esia/html>
- at the OMAS office in Ankara (Turan Güneş Bulv. Hollanda Cad. 3/5, Çankaya, Ankara)
- at the OMAS office in Develi (İbrahimağa mah. Cumhuriyet cad. Belediye İş Merkezi Kat:3 No:64)
- at the office of the Develi Municipality
- at the office of the Develi Sub-Governor
- at the EBRD Resident Office (Eskişehir Yolu, Armada İş Merkezi, No:6 Kat:4, Söğütözü, 06520 Ankara)

Copies of this non-technical summary are also provided in local village tea houses and village muhtar offices.

1.7 Can I make comments about the ESIA?

Yes. OMAS welcomes comments and observations on the ESIA, and will endeavour to provide responses to all queries and comments received during the 60-day ESIA Disclosure period.

OMAS will hold disclosure meetings, open to all attendees, at the office of the Develi Municipality and in settlements around the project site. Details will be announced in local media.

2. Project Description

2.1 How much gold is there?

The resources are estimated to be 1.38 million ounces of gold in two deposits (called Keltepe and Güneytepe). The estimated Öksüt Gold Mine Project indicated probable mineral reserves from the Keltepe Deposit are 22.8 million tonnes of gold-containing ore containing 1.4 grams per tonne of gold, comprising 1.036 million ounces of gold. Probable mineral reserves located at the smaller Güneytepe deposit are 3.3 million tonnes of ore containing 1.2 grams per tonne of gold and comprising 125,000 ounces of gold.

2.2 Who found the mineral deposit?

The resource at the Öksüt Gold Mine Project was first discovered in 2007 by the mineral exploration company Stratex International (Stratex). In 2008, Stratex began an exploration drilling programme. In

2009, OMAS formed a joint venture with Stratex and in 2013 Centerra purchased Stratex's remaining interest. Centerra now has full ownership of the Project through its Turkish subsidiary, OMAS.

Centerra published a mineral resource estimate for the Project in February 2013. OMAS undertook detailed planning and engineering studies for the Project, and they have prepared a Technical Report which was published on 3rd September 2015.

2.3 Does the Project have a mining licence?

The Project has two operation (mining) licences which cover an area of nearly 4,000 hectares and are valid until 16th January 2023.

2.4 What other permits does OMAS need?

Within the operation licences, an area was allocated for construction and operation of the mine and was assessed as part of the national EIA ("the Turkish EIA"). This area is referred to as the "EIA Permitted Area" and is the area outlined in red in Figure 1.

When the Turkish EIA was approved in November 2015, OMAS applied for permits to conduct development, operations, and other activities within this permitted area.

2.5 What standards will be applied to the Project?

OMAS will ensure that the Project complies with all Turkish legal requirements and international good practice. Turkish legal requirements include (but are not limited to) the Mining Law, the Environmental Impact Assessment Regulation, the Labour Law, the Occupational Health and Safety Law, the Mining Safety Regulation and the Land Registry Law.

The Project will also comply with the Environmental and Social Performance Requirements of the European Bank for Reconstruction and Development (EBRD). These require projects to meet the more stringent of national and European Union environmental and social requirements.

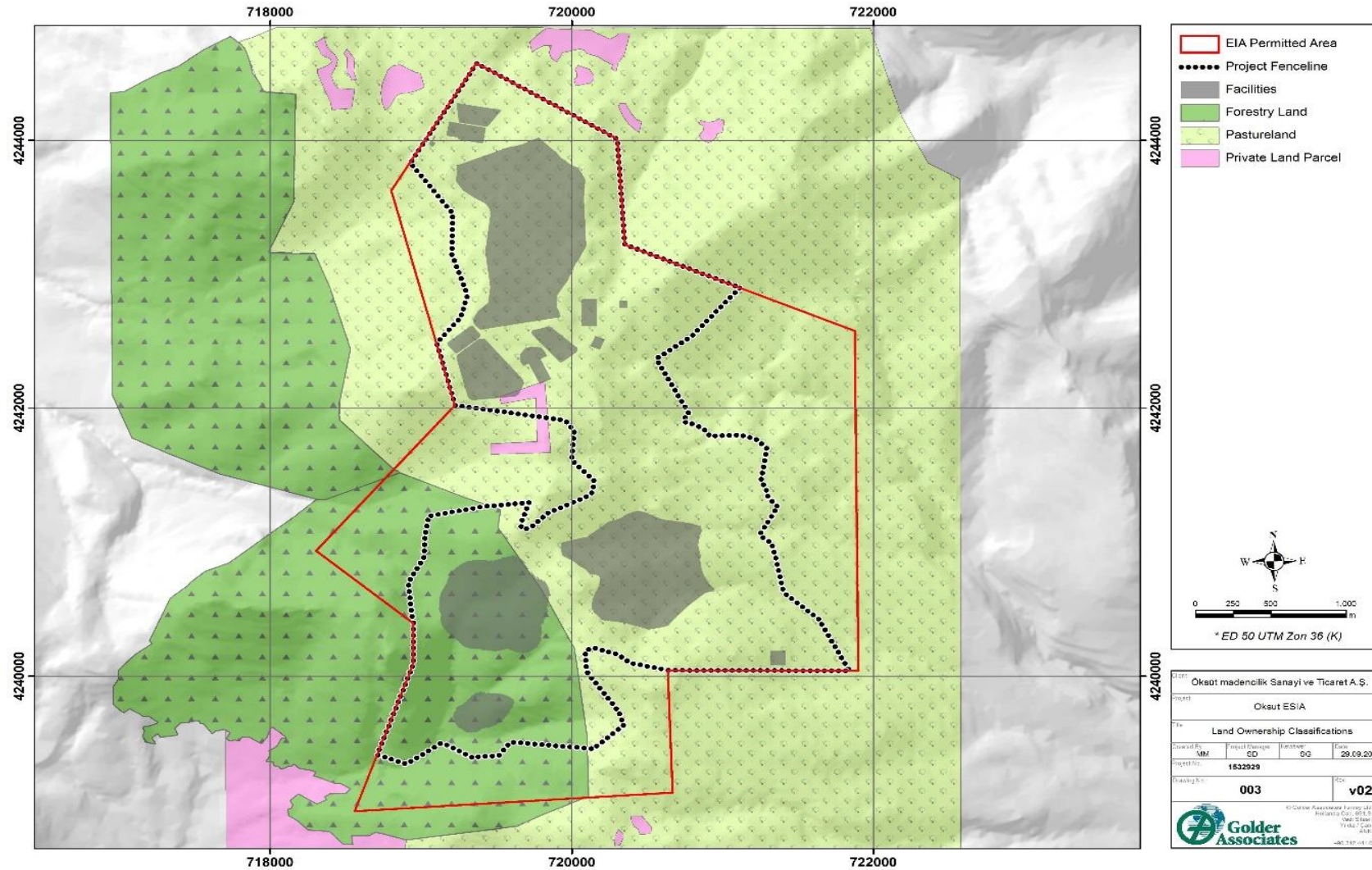
2.6 Will OMAS pay taxes and royalties?

The Öksüt Gold Mine Project estimates a total life of mine tax payments of USD \$46 million and will comply with the requirements of the Mining Law for royalty payments.

2.7 Who uses the land now and will they be affected?

The majority of the land within the licence area is state-owned forestry land and state-owned pastureland, and there is one privately-owned 8.3 ha parcel of land within the EIA Permitted Area. The different land ownership types are shown in Figure 3.

Figure 3: Land Ownership Classifications in the EIA Permitted Area



Most of the private land has been excluded from the fenceline, as OMAS has redrawn the fenceline around the Project footprint as part of their pastureland permit application. OMAS is negotiating with the owners of the one parcel of private land within the fenceline and will ensure that access will continue to be provided and Turkish legal requirements will be followed in the event that expropriation has to be undertaken.

Pastureland within the fenceline is used during the spring and early summer by shepherds from nearby communities for grazing. This grazing land will not be available once construction begins and the safety fence is built around the mine site. OMAS is working with affected shepherds, relevant governmental authorities, associations and universities to ensure that their livelihoods are not adversely impacted by the Project. Key components of the process and commitments are set out in OMAS' Livelihoods Restoration Framework which is being implemented by OMAS.

Outside the operation licence area, both the access road and the water supply pipeline will bisect pastureland and OMAS applied for their pastureland permit in November 2015. The access road has been designed to avoid cultivated farmland and will use land typically used by shepherds to access the preferred pastureland areas, rather than being located on pastureland itself. Given that the roads will only be used for project traffic (which will be very limited) it is not considered that the roads will cause significant hindrance to access. OMAS has also purchased two plots of land to the southwest of Epçe, where the water supply wells and four monitoring wells are located, (two monitoring wells at each water well).

There is some private land on the route of the powerline but acquisition of land along the powerline corridor is being carried out by a third party ("TEİAŞ"), who will expropriate any private land according to Turkish legislation. The location of powerline towers has been undertaken to minimise disruption to existing land users on both private land and public pastureland and forest land.

2.8 From where will the Project get its water?

All water sources, including springs and wells, within and in the near vicinity of the project site were identified and information on current water use by local communities was gathered.

A number of studies were undertaken to find the most appropriate place to withdraw water to provide the Project's water supply. This included working with the Hydrogeological Professor from METU, and under the direction of the 12th Regional Directorate of State Hydraulic Works (DSİ). OMAS investigated the water resources at Acısu Spring, Zamantı and Gıcık Tunnel, Zamantı River, Gümüşören Dam, and Epçe and Şahmelik Irrigation Cooperative Wells.

The aquifer at Epçe was identified as being a suitable water resource as tests showed that water abstraction is naturally recharged by the aquifer (this means that the groundwater body naturally re-fills itself). OMAS held over thirty consultation meetings with community members and authorities during the water supply study.

The mine will need 35 litres per second of water. The water will be taken from two wells located to the south of Epçe. The water will be pumped to the mine site via a small pipeline that will run close to the access road: the route is shown with the dashed line in Figure 4.

2.9 How will OMAS reach the site?

OMAS will build a new access road as the current service roads from the settlements are narrow, steep and access in winter can be hazardous. OMAS also wants to avoid an increase to the current traffic load in local communities, and to locate the road away from local communities.

The new access road is approximately 16 km long and will run from the turnoff from the Develi road, northwest of Yazıbaşı. The road will bypass around Yazıbaşı and Gömedi to avoid traffic impacts to these villages. The road turns to the west near Epçe and rises up the hills to the mine site (Figure 4). The road will be 10 m wide and will be covered with a bitumen surface.

Legend:

- EIA Permitted Area
- Proposed Pipeline
- Access Road Permit Route
- National Road
- Local Roads
- Settlements
- Facilities
- Stream

Scale: 0 450 900 1,800 m

North Arrow: N, S, E, W

Project Information:

Okut madencilik Sanayi ve Ticaret A.Ş.			
Project: Okut ES/A			
Title: Proposed Access Road and Water Supply Pipeline			
Drawn By: MM	Project Manager: SD	Project: SG	Date: 01.02.2011
Project No: 1532929			
Drawing No: 005		Rev: v03	

Goldier Associates

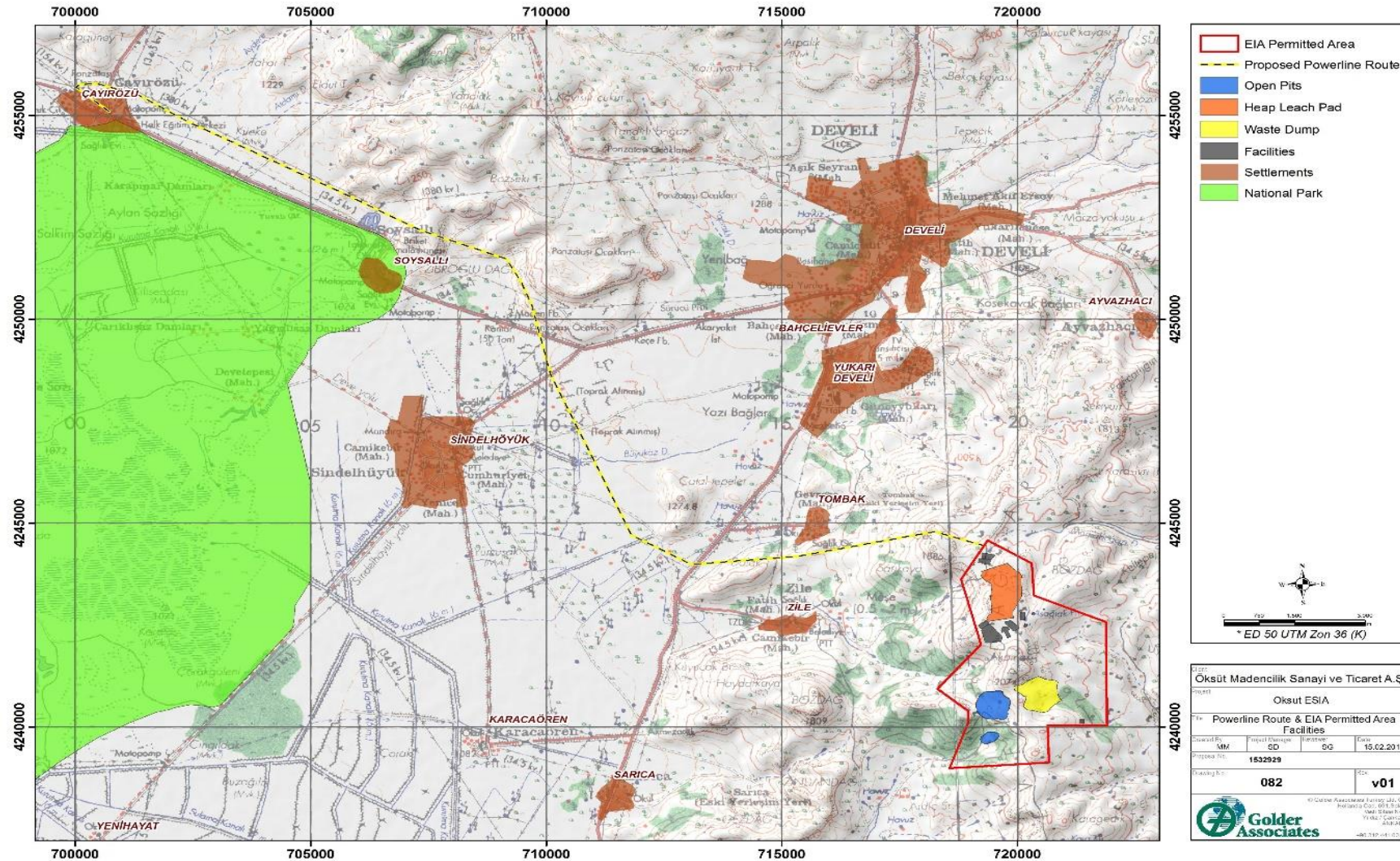
2.10 How will OMAS get a power supply to the mine?

The Turkish Electricity Transmission Corporation (TEİAŞ) is building a powerline from the Sendiremeke Substation which is approximately 26 km from the mine site.

The powerline initially heads northwest out of Çayırözü, before running back on itself and heading south east parallel to the public road, passing to the north of Soysalli where it then turns to the south south east and runs to the east of Sindelhöyük. The powerline then turns to the east and runs in between Tombak and Zile before reaching the northern point of mine site (Figure 5).

The powerline will have a voltage of 154 kV with a step-down transformer onsite to reduce the site distribution voltage to 31.5 kV. There will be 75 towers along the powerline which will range in height from 20-30 m along the flat ground, and up to 40 m in hillier areas.

Figure 5: Powerline Route



2.11 What is the planned Project schedule?

The Project will have a short mine-life of approximately eight years, after which a closure, decommissioning and after-care programme will be implemented.

The Project is planned with the following phases:

- **Pre-construction Phase** (2015 – Q3 2016): all activities necessary to apply for the Mining Operation Permit (MOP), including, detailed engineering studies, approval of the Turkish EIA and completion of this international ESIA.
- **Construction Phase** (Q2/Q3 2016 – Q3 2017): all activities related to acquisition of land, personnel, plant and equipment, and the concurrent stages of site preparation, development and construction of related infrastructure, leading to the commissioning of the ore processing plant.

The construction phase is due to commence in June 2016 pending receipt of all requisite permits, primarily with site preparation for the heap leach and mining activities; construction of the access road, water supply pipeline and powerline; and mining of pre-production waste rock.

- **Operations Phase** (Q3 2017 – 2024¹): all site activities undertaken to mine and produce gold doré, including completion of planned mining activities and final processing of available prepared ore, at which point operational activity will be deemed to be complete.
- **Closure and Rehabilitation Phase** (2023-2028): activities in accordance with a programme agreed with regulatory authorities for dismantling and disposal of all site equipment and plant and rehabilitation of all areas of site activity to a safe managed state.

OMAS will develop a detailed mine reclamation and closure plan which will aim to leave the mine and associated infrastructure area in a condition that minimises adverse impacts on local communities and the natural environment and with a legacy that makes a positive contribution to sustainable development.

Site management and monitoring activities will continue until a state of safe and stable conditions is achieved and agreed with the relevant regulatory authorities.

2.12 How many people will work at the mine?

The Öksüt Gold Mine Project is estimated to employ approximately 400 workers during construction with approximately 450 expected during operations.

Due to the relative proximity of the mine to local settlements, it will not be necessary to build on-site accommodation for project personnel. OMAS aims to recruit 100% of unskilled employees and 70% of semi-skilled employees from the directly-affected local settlements. It is expected that the remainder of employees will live in Develi. A shuttle bus system will transport staff between the mine and residential areas for each shift (there will be three shifts per 24 hour period, with shift duration in accordance with Turkish law). The shuttle busses will be rented from a local services company. Personal vehicles will not be permitted on the mine site.

The presence of the mine will also lead to further “indirect” employment in the OMAS supply chain (jobs created from those employed directly and indirectly by the mine spending their money).

2.13 What is the layout of the Project?

The main features of the mine are shown in Figure 6 and include the open pits, waste rock dump, primary and secondary crusher, heap leach facility, adsorption desorption recovery and administration buildings.

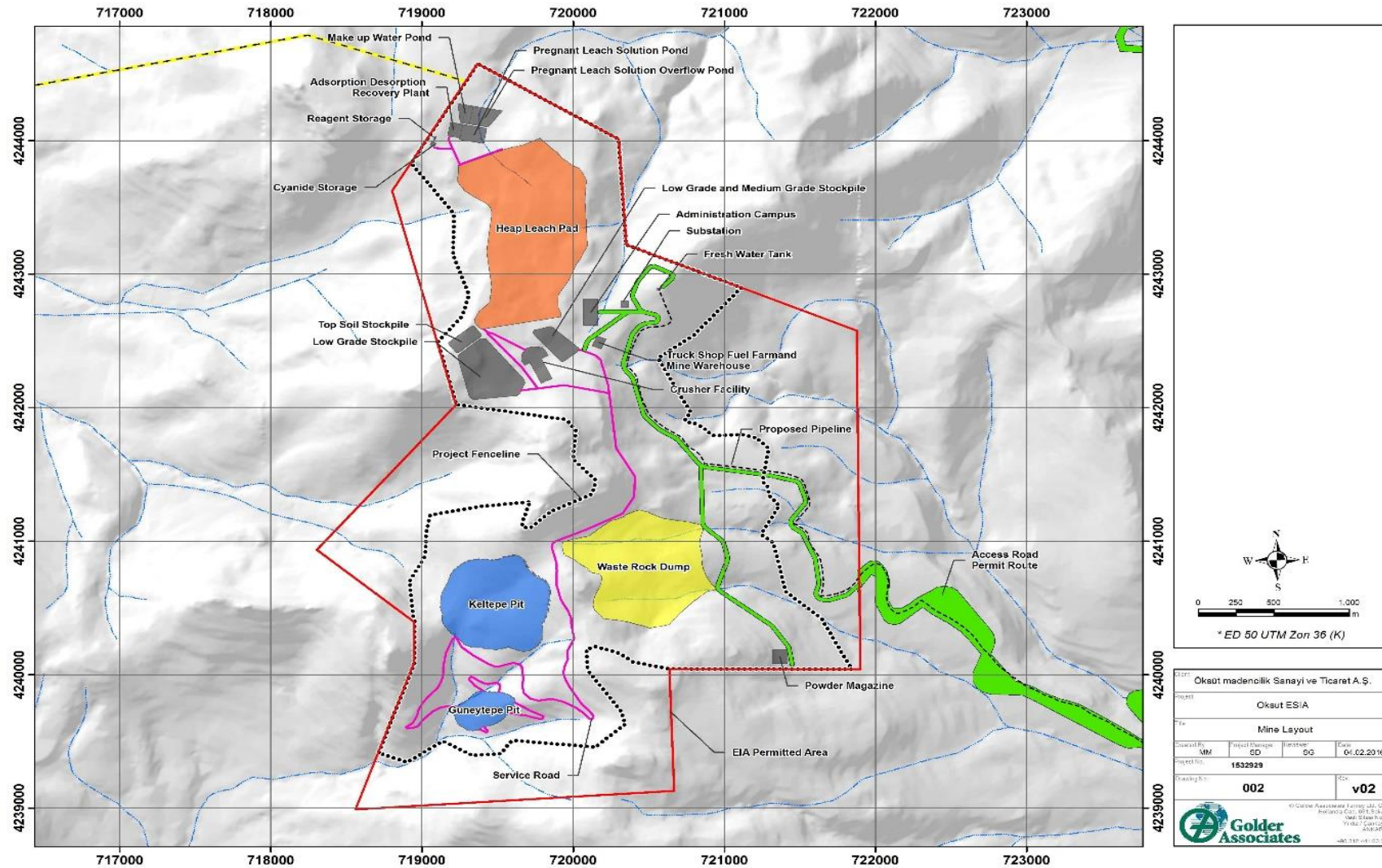
¹ Placing of ore on the heap leach facility ends in 2023, with residual gold production in 2024, based on current production rates and known reserves.

The plant site area at the northern end of Mount Develi comprises a compact area in which stockpiles, stores, workshops and the administration campus will be situated.

Due to the location of the gold deposits, the layout of the Project has been strongly influenced by the surrounding terrain and slope stability.

Alternative options were investigated to determine the most technical and financially suitable option for project design. These options were also assessed against potential environmental and social impacts. A number of alternatives were evaluated to explore the options for mining, ore processing, where to store waste rock, where to source the mine water supply and power supply and how to provide a safe and feasible road access route to the mine site.

Figure 6: Site Layout



2.14 How will the ore be mined?

Ore will be mined from the two open pits through a combination of blasting and excavation:

- The mining process requires the use of explosives to break apart the rock in the open pits.
- Following blasting, diesel hydraulic excavators will load normal highway haul trucks in the pits with ore for transport.
- The ore is taken to a stockpile area.
- Waste rock is loaded separately to the ore in the pits and taken to the waste rock dump.

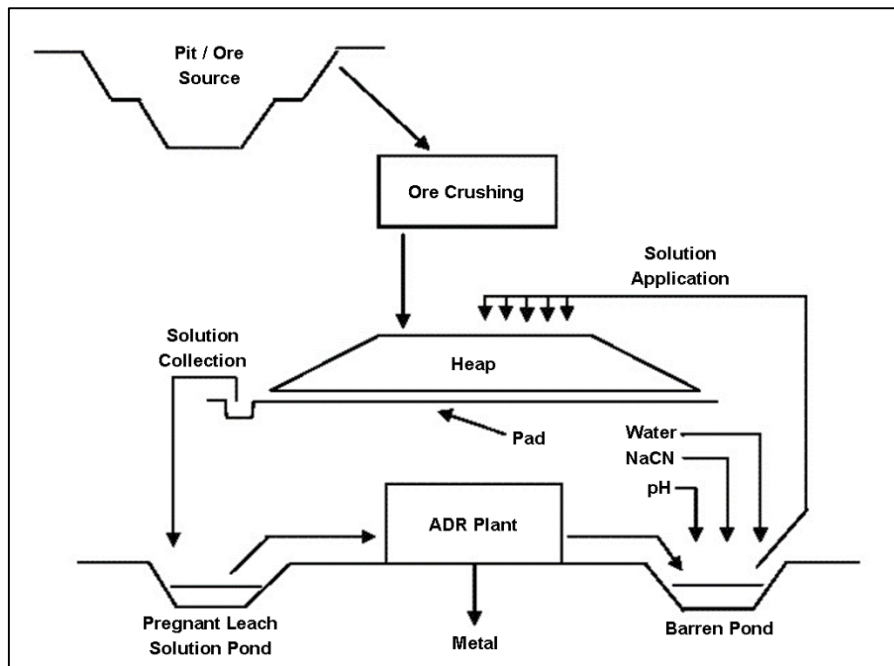
2.15 How will gold be extracted from the ore?

The ore is taken from the ore stockpiles and is crushed to the size of small pebbles and taken to the heap leach pad, where a network of trickle irrigation pipes feed a diluted cyanide solution onto the top of the heap leach. This solution dissolves the gold in the crushed ore as it trickles down through the heap leach. The heap leach pad will be lined.

When the leaching solution reaches the bottom of the heap leach pad, it is collected in a pipeline system and sent to the adsorption-desorption-recovery plant, where the gold is extracted from the solution.

A simplified process flow chart is set out in Figure 7.

Figure 7: Simplified Process Chart



2.16 Why is cyanide used?

Cyanide leaching for gold recovery has become the standard recovery method for gold in non-alluvial deposits such as that found at the Öksüt Gold Mine Project. No other chemical provides the same gold recovery, process robustness and low operating costs as cyanide, usually in the form of sodium cyanide.

For any gold project, leaching with cyanide is tested first, to check whether there are specific factors which exclude its use, such as high levels of naturally occurring carbonaceous matter, which rapidly adsorbs the

dissolved gold and prevents its subsequent recovery. Tests have shown that cyanide leaching will be highly effective at the Öksüt Gold Mine Project.

OMAS has committed to take all necessary precautions to prevent any cyanide pollution entering water, soil and the air and will ensure that all national and international standards will be applied to cyanide management.

2.17 How is cyanide transported and handled safely?

OMAS will use the CyPlus² solids to liquid system. This system has been in use in Turkey since 2013 at the Kisladağ project operated by TÜPRAG Metal Madencilik.

The CyPlus solids to liquid system is based around the shipment of cyanide in solid briquette form in specially-designed containers (CyPlus SLS containers), which is then automatically dissolved on site and transferred to on-site storage tanks as a ready-to-use cyanide solution.

Once on site, the CyPlus SLS container is attached to a CyPlus dissolution station via two hoses (inlet and outlet). Water is pumped into the container and the resultant cyanide solution is then pumped into the on-site storage. When the dissolution process is completed, the CyPlus SLS container is automatically rinsed with water and purged with air.

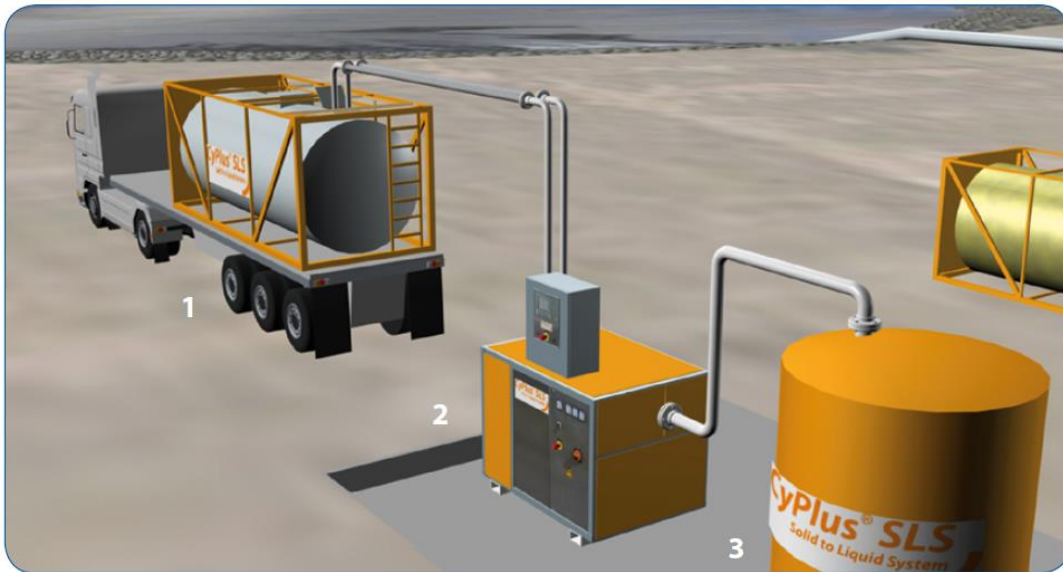
An overview of the Cyplus SLS system is shown in Figure 8. The key advantages of the CyPlus solids to liquid system over conventional packaging, transportation, and storage systems include:

- Cyanide is transported in solid briquette form in a purpose-built ISO-tank container that provides multiple layers of protection in the event of accidents;
- Workers are not exposed to cyanide during the dissolution process whereby the solid briquettes of cyanide within the ISO-tank are dissolved into a cyanide solution and pumped automatically into holding tanks;
- The “dissolution station” is a purpose-built unit, supplied by CyPlus, and specifically designed to ensure full containment of cyanide solution and no exposure to workers;
- The use of a returnable and reusable cyanide container (the CyPlus SLS container) does not lead to cyanide-contaminated packaging waste being generated.

² www.cyplus.com

Figure 8: CyPlus SLS System Overview

The CyPlus® Solid-to-Liquid System (SLS) consists of three different units:



1. CyPlus® SLS container
2. CyPlus® dissolution station
3. Existing storage tank for cyanide solution at the customer's site

CyPlus SLS containers (Figure 9) are specially designed for the transportation and dissolving of solid cyanide. The largest container is a 20 metric tonne ISO-tank container with a stainless steel pressure vessel and a high-strength carbon steel frame.

Figure 9: CyPlus SLS Container 20 Tonne ISO-tank



The CyPlus dissolution station (Figure 10) is delivered to the site as a fully assembled and tested package unit which is located in a containment area as close as possible to the cyanide storage tank.

Figure 10: CyPlus Dissolution Station



2.18 Will OMAS conform to the International Cyanide Management Code?

Yes, OMAS will conform to the International Cyanide Management Code (www.cyanidecode.org) and its activities and facilities will be independently certified and audited.

OMAS, in conjunction with its cyanide supplier³, will develop a detailed Cyanide Management Plan which includes worker safety, emergency response, employee and contractor training and transportation. Prior to completion of the Cyanide Management Plan, a Cyanide Management Framework (OMAS-ESMS-CN-PLN-001) has been prepared by OMAS setting out key approaches and commitments related to cyanide management.

2.19 How will water be managed onsite?

OMAS has developed a surface water management system with the objectives to minimise water usage and to recycle and re-use water wherever possible. During the operation phase, the Project is designed as a **zero discharge facility**, with the recycling of water used in ore processing and no planned water discharges to the environment. Diversion ditches will be used to divert rainfall runoff away from mining and ore processing activities to prevent any potential contamination. Any rain or snow that falls onto active areas of the mine site will be collected, treated, and used for ore processing and will not be discharged to the environment.

On-site water ponds have been sized to accommodate the 100-year, 24-hour storm event and are designed to be resistant to the effect of earthquakes. They have also been sized to accommodate a prolonged and significantly wet year and the melting of a significant depth of snow (up to 0.5 m). This will help to ensure that the Project does not have to discharge water due to extreme weather events.

³ All cyanide suppliers considered by OMAS were ICMC certified.

2.20 How will waste be managed?

OMAS is committed to following the waste management hierarchy (prevent, minimise, reuse, recycle) and will comply with Turkish Waste Management Regulations. OMAS has developed a:

- Non-mineral Waste Management Plan that defines how non-hazardous wastes will be collected and stored in the non-hazardous waste temporary storage area before being collected and disposed off-site by a licensed contractor.
- Hazardous Materials Management Plan which defines how hazardous wastes will be stored appropriately before being collected and disposed off-site by a licensed contractor.

2.21 How will the mine be closed at the end of its life?

Current estimates indicate that mining operations will cease 8 years after the start of open pit mining operations, although actual length of mine life will be determined by recoveries, commodity price performance, and other factors. When mining ceases, the final stockpiles of ore will be processed, and the Project will enter a period of decommissioning and closure.

OMAS will develop a detailed mine reclamation and closure plan which will aim to leave the mine and associated infrastructure areas in a condition that minimises adverse impacts on the social and natural environment and with a legacy that makes a positive contribution to sustainable development. The closure plan will be developed to adhere to national regulations and international good practice and is discussed in more detail in the Conceptual Mine Closure Framework.

3. Stakeholder Engagement

3.1 What is the Project approach to stakeholder engagement?

OMAS considers stakeholder engagement (including dialogue, consultation and the disclosure of information) to be a key element of project planning, development and implementation. OMAS believes that effective stakeholder engagement assists good design, builds relationships with local communities, and reduces the potential for delays through the early identification of risks, issues, and opportunities. OMAS is committed to a transparent and respectful dialogue with stakeholders throughout the life of the Project.

OMAS has developed a Stakeholder Engagement Plan which provides details of OMAS' approach to stakeholder engagement and their planned meetings and commitments.

Stakeholder identification and engagement commenced in and around Öksüt with Stratex in 2007. OMAS has been involved with the stakeholder engagement process since 2009 and took over full management in early 2013 to introduce the Project to local communities. This engagement included community leaders from Öksüt, Zile, Tombak, Sarıca, Gazi and Develi and community members from Öksüt, Zile, Tombak, Sarıca, Gazi and Epçe. In addition, representatives of the Forestry Department, Agriculture Department, Develi Municipality, and the Develi Sub-District Governor (and related government offices under the Sub-District Governorship) were also briefed on Project activities.

Engagement continued through 2013-14 and in late 2014 and 2015, OMAS undertook an extensive stakeholder identification and engagement process as part of the development of a socio-economic baseline study for settlements within the local area. The villages of Epçe, Gömedi and Yazıbaşı were also involved as part of this process.

As part of the planning of the powerline, OMAS has engaged with stakeholders in Sindelhöyük, Soysallı and Çayırözü.

Information and issues raised during interviews and discussions have been used to define the scope of the ESIA.

The Stakeholder Engagement Plan is available on the OMAS website: <http://oksutmadencilik.com.tr>.

3.2 What is OMAS doing to help the local community benefit from the Project?

A community relations team has been established by OMAS and an information office has been opened in Develi, which is open to the public and has members of the community relations and human resources staff working there.

OMAS is currently working with local muhtars and Government representatives to identify local community development needs and priorities. This information will be used to make sure that OMAS' plans and projects for social investment are helpful and realistic, and to integrate local employment and local procurement needs within the foundations of the OMAS' community development projects.

OMAS will then develop an operations-phase Community Development Plan to coordinate social investment, local employment and local procurement around common objectives and principles.

OMAS will use this information to plan social investment in the longer term, looking towards the time that the mine will close.

A monitoring programme will also be implemented to track social investment and see whether it has been successful or not.

4. Potential Impacts and Mitigation

4.1 What are the key impacts of the Project?

OMAS is committed to sustainable development by finding a balance between environmental, social and economic needs. As a responsible corporate citizen, OMAS recognises its responsibilities to the environment and to the communities in which it operates. OMAS is also committed to maximising the benefits of the Project and to avoiding, minimising or mitigating any environmental or social impacts.

The construction, operation and closure of the Öksüt Gold Project has the potential to cause both benefits and adverse impacts. The main objective of the ESIA was to carry out an assessment to find out how significant each potential impact is and who the impact will affect. OMAS then investigated ways to avoid, minimise or compensate for any impacts that may be caused by the Project. OMAS has committed to these measures and the Environmental and Social Management System describes how OMAS will ensure that these commitments are fulfilled and who is responsible for fulfilling them.

Key impacts that could be caused by the Öksüt Gold Mine Project are summarised below and are discussed in more detail in the following sections:

- the mine will create jobs for local people and opportunities for local businesses;
- fencing the mine site will take away access to pastureland that shepherds use for sheep grazing;
- fencing the mine and building the facilities will demolish springs that are currently used seasonally by shepherds and a local village;
- abstraction of water from the wells could affect the water level for other well users in Epçe;
- the mine could cause changes to the local water quality;
- building the access road, powerline and all activities at the mine site could create dust, air pollution, additional noise and vibration;

- building the access road will affect shepherds who will have to cross the road to reach pastureland areas;
- building the powerline will require expropriation of a limited amount of private land for powerline poles and will also require small amounts of land for powerline poles in state-owned pastureland areas;
- building the mine and roads could damage local archaeological sites;
- building the mine will remove the habitat of plants, animals and birds;
- building the powerline may impact birds near the Sultan Sazlığı wetland;
- the presence of the mine and powerline will change the view when looking at the Develi Mountains.

Ways of managing and mitigating each of these impacts is discussed in detail in the following sections.

4.2 Will OMAS create opportunities for local employment?

Local employment

The Project is expected to create approximately 400 jobs during construction (50 OMAS employees and approximately 350 contractors) and approximately 450 jobs during operation (150 OMAS employees and approximately 300 contractors).

Research has indicated that job opportunities in local villages can be limited and youth unemployment is generally high. OMAS and its contractors have made a commitment to employ 100% of its unskilled workforce and 70% of the semi-skilled workforce from the local area. For semi-skilled and skilled labour, priority will be given to local people who have the appropriate qualifications and experience. OMAS will also develop training programmes as part of their social investment, to assist local people to obtain the training required to work at the mine.

It is anticipated that Turkish contractors will undertake the majority of the earthwork activities, which will have one of the larger workforce requirements enabling the employment of Turkish nationals and encouraging local employment. The Construction Contractor and Contract Miner will be the more significant contracts let during the course of the Project with respect to employment opportunities.

Research has shown that it is common for residents of local villages (particularly young people) to seek jobs elsewhere (both in Turkey and abroad). The job opportunities created by the Öksüt Gold Mine Project will create an opportunity for former village residents to return to the area to work. OMAS has contacted Village Associations in major cities such as Istanbul and Ankara to seek potential candidates and suppliers.

Training

In addition to setting targets, OMAS will provide training for local residents who would like to find employment with the Project. The objectives of the training will be to prepare local residents for employment by providing training in the skills required by the Project. OMAS has commenced planning for internal and external vocational training with the National Education Centre and other accredited institutions. Specific courses have been identified, including those in the engineering / fabrication trades. Training will commence upon confirmation by OMAS of the specific skills requirements to ensure the work readiness of graduates and to facilitate a pathway to employment for direct and indirect employment.

OMAS understands that there will be an increased risk of accidents at work when an inexperienced workforce is hired. In order to reduce this risk, OMAS will ensure that new workers can familiarise themselves with the day and night working environments and work processes, and will ensure appropriately detailed induction, training and supervision is implemented throughout the life of the Project.

OMAS will work with the EBRD and the Government to identify opportunities to increase women's participation in the Project. Opportunities for women in mining are often predominantly in unskilled or semi-skilled roles (such as catering and housekeeping); however these will be limited at the Project with no mine camp facilities and a small administration centre.

4.3 What opportunities will be created for local suppliers?

OMAS has developed plans to maximize local procurement, and policies to maintain business ethics and transparency. The Öksüt Gold Mine Project is estimated to have a total expenditure of US\$560 million over the life of the mine (excluding taxes and financing) which will provide increased revenue to the State budget, provide employment for direct employees and provide opportunities for local businesses and contractors.

OMAS and its main contractors are committed to purchase the majority of goods and services from local suppliers and contractors wherever this is possible. The majority of the total Project expenditure will be in Turkey and OMAS has identified items which it intends to procure nationally:

- Diesel will be supplied from one of the major oil companies in Turkey, most probably within a long-term purchase and dealership agreement.

The following items will be procured locally:

- Civil works contracts and materials;
- Maintenance and repair of cars and heavy equipment;
- Transportation services for the mine workforce;
- Car rentals;
- Fuel for light vehicles;
- Catering services for the mine workforce;
- Office furniture;
- Stationery;
- Cleaning and laundry services.

4.4 How will the Project affect land use and livelihoods of those using the land?

The majority of the land within the licence area is state-owned forestry and pastureland. There is one privately-owned 8.3 ha parcel of land in the Licence Area.

Pastureland areas and springs within the fenceline are used for grazing during the spring and early summer by shepherds from project nearby communities. The grazing land inside the fenceline will not be available for use by shepherds during the operations phase.

OMAS is working with affected shepherds and land users and owners along the access road, water pipeline and powerline and other relevant parties to ensure that their livelihoods are not adversely impacted by the Project. Key components of the process and commitments are set out in OMAS' Livelihoods Restoration Framework which is being implemented by OMAS.

4.5 What will be the impacts on water resources?

Local water use

The local community use groundwater from deep and shallow wells for agricultural irrigation and water supply to villages. The water from the Acısu Spring, which is fed by water from the mine site, is used by local people for medicinal purposes, however tests have shown that the pH of this water is very low (meaning it is acidic) and the heavy metal content of it is very high (meaning that it could be toxic if ingested) and repeated consumption is likely to be harmful to human health. The Acısu Creek is also used for agricultural irrigation.

The history of water investigations and monitoring

Surface and groundwater has been monitored since Stratex undertook their initial investigations in 2008. The water monitoring program has continued, and as part of the Turkish EIA, water was modelled from 322 locations and a computer model was developed to investigate the potential impacts that the Öksüt Gold Mine Project may have on groundwater resources.

Loss of water resources

There are a number of surface water resources that will be lost when the mine is built. These are located within the fenceline, along the access road and the water supply line routes. These include developed springs, natural springs and water depots (which are used to store water for use by villages).

Construction and operation of the mine will mean that some surface water features are no longer available to pastureland users as they will be within the mine fenceline. OMAS has worked with shepherds who currently use these features to agree how and where to replace these water sources. OMAS has committed to replace all affected wells.

OMAS is also investigating the possible effects to the community water supply lines and is working with related governmental authorities. OMAS will ensure that the water flow to any affected lines will be replaced.

Changes to water quantity

The amount of water flowing into the Acısu Spring will increase slightly when the open pits are excavated. This is because more water will reach the spring through an existing fault in the underlying bedrock.

Changes to the water levels in Epçe

Although it is unlikely, there is a risk that the water abstracted for the mine will affect the water levels for other well users in Epçe. The water level will be continuously monitored and if any of the adjacent wells start to produce an inadequate yield, OMAS will deepen the existing wells or OMAS will establish new wells for the mine water supply elsewhere.

Changes to water quality

When rock that has previously been underground is brought to the surface and is exposed to air and water, it can react with the air and change the quality of water that runs over it (for example, from rainfall), making it more acidic and changing its properties. This water can potentially seep into the groundwater. This is called “acid rock drainage”.

OMAS employed specialist consultants to develop a computer model which was used to determine whether the mine would cause the groundwater quality to deteriorate, as this would affect the local users of the groundwater. The engineers designing the mine have considered this issue in detail, and a number of controls have been added to the mine design (such as liners underneath the heap leach pad) to minimize this impact.

In order to monitor any potential effects, OMAS will undertake a continuous monitoring programme throughout the project life cycle and after closure to ensure that there are no deleterious effects to groundwater quality. If any significant changes in groundwater quality are found, OMAS will undertake remedial action immediately.

Managing the risk of contamination

The Öksüt Gold Mine Project has been designed to minimise the risk of contamination to water resources. The design includes a closed contact water system, which means that all the rain and snow falling in ore processing areas and active mining areas, is collected before it can soak into the ground. This collected water is kept inside the closed contact water system, and no polluting water is discharged into the environment.

The heap leach pad and all ponds are double-lined to mitigate the risk of any contamination. Cyanide detection systems will be installed and all persons working in a cyanide area will wear a personal cyanide monitor that will emit a noise if atmospheric cyanide concentrations rise above safe threshold levels are detected.

OMAS has developed an Emergency Response Plan and is developing a Cyanide Management Plan which will be implemented prior to any cyanide being transported to the site. OMAS will train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner. Training will include the hazards associated with cyanide use; OMAS procedures and systems; and how to respond to exposure and environmental releases of cyanide.

Water Monitoring Programme

OMAS has a number of Management Plans and procedures which explain how they will control the risk of any contamination to local water resources, and OMAS will ensure that their contractors incorporate these commitments into their working practices.

4.6 How will the Project affect air quality?

Dust

There is the potential for dust to be caused by:

- Vehicles using the tracks from nearby settlements to access the mine site prior to completion of the access road.
- Construction activities to build the access road, water supply pipeline and the powerline.
- Construction and operation at the mine site, including from blasting within the open pits.

The use of vehicles and machinery will also cause pollution from exhaust emissions.

Computer modelling indicated that construction of the access road and construction and operation of the mine may temporarily deteriorate the air quality for those living at the closest settlements. OMAS and its contractors have committed to methods to manage these impacts, such as keeping stockpiles covered and dusty roads damp, and will pass these commitments onto their contractors. After these management controls are implemented, it is not predicted that there will be any significant impacts. Monitoring will be undertaken to ensure that the commitments are being effective.

4.7 Will the Project generate noise and vibration?

Construction of the access road and powerline

The use of the tracks to the mine site prior to completion of the access roads may be noisy and cause a nuisance to people living nearby. OMAS will consult with local muhtars to agree schedules when they can use the tracks, and to ensure that vehicles are not causing a nuisance.

Computer modelling indicated that the closest villages may be affected temporarily by the noise from the construction of the access road. OMAS and its contractors have committed to keep their machinery in good condition, monitor noise levels and respond to any complaints received.

There is likely to be temporary noise impacts to residents living close to the new powerline towers in the nearest settlements during construction of the powerline. The construction contractor will notify the residents prior to construction and the noise is expected to last for 2 days for each tower.

Project activities on the mine site

The potential noise from construction and operation of the mine has been modelled and it is not considered that it will cause any significant changes in noise levels experienced in local villages.

Blasting will occur at regular times during the day time throughout the life of the mine. The type of blasting will be designed to reduce the transmission of noise and modelling indicates that there will not be any vibration impacts from blasting in local settlements.

4.8 What other impacts might affect community health and safety?

Road Traffic

Existing roads in the Project area are minor roads with small, if any, distance between the roadside and homes and other infrastructure in the neighbourhoods. Current traffic volumes are low, and predominantly comprise light vehicles. Project vehicles will increase the traffic load in the study area, in particular, heavy trucks during construction. This increase in vehicle traffic presents a risk to the local community of accidents.

OMAS has designed the access road to bypass Yazıbaşı, Gömedi and Epçe for the operations and closure phases of the Project. OMAS has also developed a Transport Management Plan to address safety aspects related to the increase of traffic. The access road will only be used for project traffic and vehicle volume at junctions is not considered sufficient to cause any hindrance to other vehicles. Speed limits and signs will be used to alert drivers to specific commonly used crossing points. The access road will not have security gates but will have signs stating that the road is a private road for mine vehicles only. Based on consultation with pastureland users, there will be designated crossing points for shepherds; drivers will be trained in safe driving techniques and speed levels will be imposed on the road. Local residents will be given road safety awareness training. The training will target vulnerable groups such as children.

Security

Security of the site will be provided through security personnel, a perimeter fence (including patrols) and a CCTV system and will be hired through a well-known and reputable security provider. OMAS will undertake a risk assessment prior to the appointment of security personnel and will implement a Security Management Plan in accordance with Turkish legislation and the Voluntary Principles on Security and Human Rights. The performance of the security contractor will be continually monitored by OMAS.

Diseases

An increase in communicable diseases could occur in the study area as a result of the Project. This could result from factors including: an increase in in-migrants to the study area living with undetected diseases, living conditions, poor food hygiene or other social ills that come with an already mobile population. OMAS will ensure that it screens employees and contractor before they are employed and on a periodic basis throughout their employment or contract, and OMAS will provide education awareness on healthy lifestyles, focusing on: alcohol, personal and food hygiene and communicable diseases.

4.9 How will cultural heritage be protected?

Detailed archaeological surveys were undertaken in the local area by and these showed that there are some locally and nationally sensitive archaeological sites nearby.

OMAS took these sites into consideration and ensured that the fenceline and powerline was designed to avoid archaeological sites.

There are no anticipated impacts on any cultural heritage; however OMAS has a procedure in place to be followed in the unlikely event that any further archaeological features are discovered during construction and mine operation.

4.10 How will biodiversity be preserved?

When the mine site is cleared and the topsoil is removed, plants and animals will lose their habitat. There are five species of plant identified onsite that are very rare and are endangered and very little is known about one of these species in particular. As soon as OMAS learnt of the presence of these plants, further surveys were commissioned to find out how widespread the distribution of these plants are. OMAS is in the process of undertaking a series of surveys throughout the seasons to determine this. OMAS will carry out further surveys as soon as possible in spring (the timing will depend on when the snow melts), and will implement a number of management controls which include:

- Removing the plants and growing them in a greenhouse off site.
- Collecting the seeds and creating a seed bank which can be used to plant new areas and restore affected areas.
- Ensuring that construction activities are scheduled to leave enough time to allow for surveys and plant removal.

Although OMAS has already undertaken a number of biodiversity surveys, OMAS will undertake pre-construction surveys to identify protected plant and animal species, including the common tortoise.

OMAS will restore and rehabilitate disturbed areas as soon as possible, for example, by planting trees in areas disturbed during exploration and construction that are not required for the operation of the Project. When the Project is being decommissioned, OMAS will identify and use local species to rehabilitate the mine site.

OMAS has developed a detailed Biodiversity Management Plan and a Biodiversity Action Plan which outline OMAS' commitments to preserving biodiversity and the process that will be taken to achieve and implement these commitments.

4.11 Will the powerline affect birds?

The powerline route runs just outside the northern boundary of the Sultan Sazlığı National Park, which is an important wetland area (a designated Ramsar site) that is used by migratory birds. The addition of another powerline in this area will increase the risk of collision with the powerline during flights and electrocution by birds. In order to avoid and minimise any impacts to the birds that use the wetland, OMAS is committed to minimizing its impacts to the Sultan Sazlığı National Park, with a detailed suite of mitigation measures such as bird flight diverters and additional surveys, as outlined in the ESIA and Biodiversity Management Plan.

4.12 What will be the visual impact of the Project?

Even after attempts to soften the visual impact of the mine, it is considered that the presence of the mine will cause deterioration of the view of the Develi mountains from the Develi – Yahyalı Road (Figure 11), the Epçe-Gümüşören Road (Figure 12) and from Öksüt (Figure 13).

Figure 11: Change in view from the Develi-Yahyalı Road



Figure 12: Change in view from Epçe-Gümüşören Road



Figure 13: Change in view from Öksüt



The powerline will be built in an area where there are already a number of existing powerlines, so the views are already affected. Despite this, it is still considered that the views from Tombak, Zile and Sindelhöyük are likely to be changed by the presence of the new powerline.

5. Environmental and Social Management

5.1 How will OMAS manage its environmental & social commitments?

OMAS has a suite of Environmental and Social Management Plans which form part of its Environmental and Social Management System. The Management Plans describe how OMAS will ensure that environmental and social risks are managed and that identified management activities are carried out by staff and contractors. It makes clear who is responsible for each activity, when tasks need to be completed and how they will be monitored and reviewed.

5.2 How will OMAS monitor activities?

OMAS has developed and implemented detailed monitoring measures to ensure that it can check that environmental and social management measures and commitments are working and that it is fulfilling its regulatory requirements and other commitments. The detailed monitoring measures are listed in each Environmental and Social Management Plan, and include a description of what needs to be monitored, how it is monitored, how often, and who is responsible for the monitoring.

OMAS has also developed a suite of key performance indicators, which are used to track the success of environmental and social management.

OMAS will continue to monitor environmental and social risks throughout all phases of the project, including during decommissioning, and after the Project is closed. OMAS has a commitment as part of the Turkish EIA to monitor the site for up to 30 years for environmental issues.

5.3 How will OMAS react in an emergency?

OMAS has developed an Emergency Response Plan, which provides the process and procedures that OMAS will follow, together with local emergency service organisations, in the event of an occupational safety or environment incident at OMAS during the life of the mine.

5.4 How will OMAS manage the health and safety of its employees?

OMAS and its contractors 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) during all phases of project. Worker health and safety management systems are currently in place for exploration activities and more detailed management systems and operating procedures are under development for construction and operations.

5.5 How will OMAS ensure that its employees are treated fairly?

OMAS has developed a Labour Management Plan, which applies to OMAS and its contractors, which outlines procedures and requirements implemented by OMAS to ensure that OMAS and its Contractors respect and protect the fundamental principles and rights of workers through promoting personal respect and a safe work place. This includes:

- fair treatment;
- non-discrimination and equal opportunities for all workers;
- establishing, maintaining and improving a sound worker-management relationship;
- promoting compliance with any collective agreements to which OMAS is a party;
- compliance with applicable national labour and employment laws;

- protecting and promoting the safety and health of workers, especially by promoting safe and healthy working conditions;
- preventing the use of forced labour and child labour (as defined by the ILO and Turkish legislation).

5.6 How will OMAS communicate and engage with stakeholders?

A Stakeholder Engagement Plan is in place to ensure that there is regular ongoing engagement with the community, local government and organisations, to inform them of project plans and developments on an ongoing basis and gather any complaints or feedback. A Stakeholder Engagement Register records all OMAS interactions with stakeholders.

5.7 How can stakeholders make a complaint or make an inquiry?

OMAS implemented their Grievance Procedure in October 2014, which provides a process for all people to raise any complaints and grievances, and allows the project to respond to and resolve the issues in an appropriate manner.

The OMAS Grievance Procedure provides a channel for individuals, groups and communities to raise any concerns that they have. Any complaint can be lodged:

- in person, writing or over the phone at the OMAS office in Develi or the OMAS office in Ankara;
 - the OMAS office in Develi:
İbrahimağa mah. Cumhuriyet cad. Belediye İş Merkezi Kat:3 No:64 Devli/Kayseri
info@oksutmining.com
0530 3995 772
 - the OMAS office in Ankara: Turan Güneş Bulv. Hollanda Cad. 3/5, Çankaya/Ankara
info@oksutmining.com
- via the Suggestion Boxes located in the neighbourhoods near the Project;
- in person verbally to site staff, including contractors, which will be recorded on a feedback form.