



# Environmental & Social Management System

## Stakeholder Engagement Plan

<b>Stakeholder Engagement Plan</b>		
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## 1 INTRODUCTION

### 1.1 Document Number

This document is the Stakeholder Engagement Plan (SEP) for the Öksüt Gold Project. The document reference number for this Management Plan is OMAS-ESMS-SEP-PLN-001.

### 1.2 Purpose

The purpose of this document is to:

- Define the scope of the Management Plan and set out applicable management interfaces;
- Define roles and responsibilities;
- Outline the applicable Project Standards relevant to this Management Plan;
- Define Project commitments, operational procedures and guidance relevant to this Management Plan;
- Define monitoring and reporting procedures, including Key Performance Indicators;
- Define training requirements;
- Set out references for supporting materials and information.

This SEP is one of a series of environmental and social management plans developed by OMAS and that set out the procedures and principles used by OMAS to manage engagement with stakeholders related to the construction, operation and closure of the Öksüt Gold Project.

This SEP sets out a technically robust and culturally appropriate approach to stakeholder consultation, disclosure, and the management of any grievances by OMAS.

#### Goal of this Stakeholder Engagement Plan

The goal of this SEP is to improve and facilitate decision-making that involves Project-affected people and other stakeholders in a timely manner, and to ensure that these groups are provided sufficient opportunity to voice their opinions about the Project.

The SEP is a document that will be used by OMAS to guide its stakeholder engagement activities. In addition, the SEP provides a clear framework to assist stakeholders in understanding how to engage with OMAS. In order to assist stakeholders in making best use of this SEP, the SEP also sets out the following information:

#### Specific Objectives of this Stakeholder Engagement Plan

The specific objectives of this Management Plan are to:

- Define the Project area;
- Identify, map and assess Affected Parties and Other Interested Stakeholders, and how they may be affected by or interested in the Project;
- Set out stakeholder analysis undertaken to understand Project stakeholders, so that appropriate methods and tools to engage them can be developed;
- Provide an action plan for consultation that allows for meaningful stakeholder input into the Project;
- Build long-term relationships between OMAS and the local communities;
- Ensure stakeholders have access to information on Project activities in a timely manner;

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- Ensure information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend;
- Ensure that vulnerable and disadvantaged groups (including women), are identified and that practical measures are implemented to include them in scoping and ongoing consultation;
- Establish clear mechanisms for managing stakeholders' questions, concerns, and grievances and provide appropriate conflict resolution processes;
- Manage expectations among communities and other stakeholders;
- Document formal consultation and disclosure activities, define stakeholder tracking and records management system.

### 1.3 Application

The requirements set out in this Management Plan apply to all OMAS operations including contractors.

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

### 1.4 Commencement

This Stakeholder Engagement Plan applies from 1 April 2016.

### 1.5 Authority and Management

The OMAS Executive Committee approved this Management Plan on 1 March 2016.

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

Any requests for changes to this Management Plan must be addressed to the owner of this management plan and will be subject to appropriate review and approval processes as outlined in the MOC procedure.

## 2 SCOPE

### 2.1 Scope of this Stakeholder Engagement Plan

This Stakeholder Engagement Plan covers all OMAS operations including contractor activities. Implementation by contractors is addressed in the Contractor Management Framework (OMAS-ESMS-CM-PLN-001).

### 2.2 Overlaps with other Management Plans

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

This Management Plan has overlaps and cross-linkages to a number of other Management Plans which have community and stakeholder engagement implications and/or requirements, including:

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- Community Development Plan (OMAS-ESMS-CD-PLN-001).
- Livelihood Restoration Framework (OMAS-ESMS-LR-PLN-001).
- Community Health, Safety and Security Plan (OMAS-ESMS-CHSS-PLN-001).
- Contractor Management Plan (OMAS-ESMS-CM-PLN-001).
- Conceptual Closure Framework (OMAS-ESMS-CP-PLN-001).
- Biodiversity Management Plan (OMAS-ESMS-BMP-PLN-001).
- Biodiversity Offsets Strategy (OMAS-ESMS-OFF-PLN-001).

### 3 ROLES AND RESPONSIBILITIES

#### 3.1 Key Roles and Responsibilities for Management Plan Implementation

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

**Table 1: Key Roles and Responsibilities**

Role	Responsibilities
OMAS General Manager	<ul style="list-style-type: none"> <li>• Approval of this Plan and resources required for implementation.</li> </ul>
OMAS Director External Relations & Sustainability	<ul style="list-style-type: none"> <li>• Ensuring Project compliance with the Project Standards and other requirements set out in this Plan.</li> <li>• Overall responsibility for Plan scope and implementation.</li> <li>• Development, monitoring and revision of this Plan.</li> </ul>
OMAS Community Relations Manager	<ul style="list-style-type: none"> <li>• Timely implementation of this Plan, including coordination with implementing organisations and other stakeholders.</li> </ul>

#### 3.2 Key Interfaces

Key interfaces in the implementation of this Management Plan (i.e. roles with responsibility for delivering elements of this Management Plan) include:

- OMAS Project (Construction) Manager, particularly in relation to the safe management of activities and associated stakeholder engagement during construction;
- Mine Operations Manager, particularly in relation to the safe management of activities and associated stakeholder engagement during operations.

### 4 PROJECT STANDARDS

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

- applicable Turkish Standards;
- Turkish EIA requirements;
- other commitments to and requirements of Turkish Government authorities;

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- applicable international standards and guidelines;
- applicable Centerra and OMAS standards, policies and procedures;
- other industry guidelines with which OMAS has committed to comply.

#### **4.1 Applicable Turkish National Standards**

There are no specific requirements under Turkish law for ongoing stakeholder engagement during construction and operations.

The *Law on the Right To Information* (Official Gazette, 9 October 2003, No 4982) (Bilgi edinme hakkı), sets out the public rights and procedures for accessing public information. This is applicable to public institutions and sets out the basic obligations to make information available to the public.

#### **4.2 Turkish EIA requirements**

Under the *Environmental Impact Assessment (EIA) Regulation* (Official Gazette, 17 July 2008, No 26939), a limited public disclosure process is defined related to the EIA process.

#### **4.3 Other Commitments to and Requirements of Turkish Government Authorities**

None applicable.

#### **4.4 Applicable International Standards and Guidelines**

The international standards which OMAS will implement are those set by the European Bank for Reconstruction and Development (EBRD). EBRD *Performance Requirement 10: Information Disclosure and Stakeholder Engagement* sets out requirements with regard to stakeholder engagement. OMAS will comply with the requirements of EBRD Performance Requirement 10 when implementing its policies.

Key objectives include:

- To identify people or communities that are or could be affected by the project, as well as other interested parties.
- To ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation.
- To maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.

Key requirements relate to:

- Stakeholder identification, including disadvantaged and vulnerable groups.
- Development of a Stakeholder Engagement Plan.
- Disclosure of Project information to affected communities.
- Meaningful consultation through early and ongoing engagement.
- Disclosure requirements for Category A projects (Öksüt is a Category A project) involving a formalised and participatory assessment process involving informed participation.
- Engagement during project implementation and external reporting.



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- Grievance mechanism to receive and respond to stakeholder concerns related to the Project in a timely manner.

#### **4.5 Applicable Centerra and OMAS Standards, Policies and Procedures**

##### ***OMAS Sustainability Policy***

Reflecting the Centerra Sustainability Policy, the OMAS Sustainability Policy (OMAS-HSEC-POL-002) commits OMAS to undertake the following:

- 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.

##### ***OMAS Grievance Procedure***

The OMAS Grievance Procedure (OMAS-HSEC-PRC-005) commits OMAS to implement a Project-specific Grievance Procedure for resolution of any stakeholder concerns and grievances during the all phases of the project (construction, operations and closure) in accordance with EBRD PRs and good international industry practices.

The procedure has been disclosed to stakeholders and is applicable to all complaints received from Project affected communities, individuals and/or other third parties and will be used by both the site team and the community relations team to manage the resolution of such complaints.

The OMAS Grievance Process and a sample grievance form are included in Section 11.2 of this SEP.

##### ***OMAS Local Employment and Training Procedure***

The OMAS Local Employment and Training Procedure (OMAS-HR-PRC-004) commit's OMAS to implement opportunities for local employment and ensuring a fair distribution of employment opportunities in the communities located near and impacted by the Project. This is vital for establishing a good relationship between the company and citizens in the local neighbourhoods.

By implementing this plan, OMAS will also apply good international industry practices and EBRD PR2 (Labour and Working Conditions), which require that the company:

- Establish, maintain, and improve worker-management relationships,

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- Promote fair treatment, non-discrimination, and equal opportunity for workers, and compliance with national labour and employment laws,
- Protect the workforce by not employing child labour and forced labour, promote safe and healthy working conditions,
- Uphold safe and healthy working condition, and protect and promote the health of workers.

Further, this plan also aligns with all Turkish National Labour laws such as the Turkish Labour Law 4857 and other related laws and regulations, and will ensure compliance with these.

Communities directly affected by the current activities of the company will have priority access to local employment opportunities, followed by workers in the district (Develi) and then the province (Kayseri), in which the Project is located. Turkish nationals will always be given priority over expatriates, who will only be used where Turkish nationals cannot supply the particular skills and experience needed in the role.

Opportunities for direct employment will be constrained by the availability of appropriate skills. Taking into consideration the skills limitation within the Project-affected area, the focus of the employment strategy will be employment of the unskilled and semi-skilled workforce. The Project anticipates that:

- The vast majority (target of 100%) of the unskilled workforce will come directly from the affected communities;
- A high proportion of the semi-skilled workers (target of 70%) will come directly from the affected communities, the districts and the province.

Preliminary employment targets are set out below.

**Table 2: Preliminary Employment Targets**

Category	Settlements in the Project Area	District-Provincial (Develi-Kayseri)	Turkish Nationals
Unskilled	100%	100%	100%
Semi-skilled	70%	30%	100%
Skilled	-	50%	90%

OMAS will adopt a “tiered” approach to recruitment. Priority will be given to project affected settlements including Develi. If the required skill is not found here then workers in other adjacent districts and then within Kayseri Province will be targeted. If the required skills are not found in any of these then OMAS will search nationally and then internationally for suitably qualified and experienced staff.

In addition to levels of hiring, the company will support training for residents so they are better prepared for working at the project site. The following table provides the objectives and targets for the training programs.

**Table 3: Community Training Objectives and Targets**

OBJECTIVE	INDICATOR	TARGET
To facilitate skills develop to enable pathways to employment for people in affected communities to work with the Project	# training programs provided to residents of affected communities training completed vs. training planned	1 per year 100%

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To raise the skill level of local residents	# affected community residents trained for skilled positions	1 per year
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Contractors will be encouraged by the Company to apply the same hiring procedures and operate in accordance with the Company's Policies and follow all Turkish Labour Laws.

### **OMAS Procurement of Goods and Services Policy and Procedure**

The OMAS Procurement of Goods and Services Policy and Procedure (OMAS-FIN-PRC-001) commit's OMAS and its sub-contractors to implement procurement before, during, and after construction and during operation of Öksüt Project in accordance with the following guidelines:

- To maximize local supply of goods and services in accordance with the defined supplier and contractor zones during the construction and operation of the Öksüt Mine Project.
- To enable local firms to competitively tender for opportunities.
- To give priority to local firms and individuals in the case of suitable price, quality and capacity for periodic and systematic supply of mine consumables and services.

### **OMAS Community Development Framework**

The OMAS Community Development Framework (OMAS-ESMS-CD-PLN-001) commits OMAS to ensuring that, after the direct impacts to communities affected by the Project are mitigated, the wider community is able to access benefits that are presented through delivery of the Project.

## **4.6 Other Industry Guidelines with which OMAS has Committed to Comply**

### **4.6.1 ICMM Core Principles**

OMAS will follow the core principles of International Council on Mining and Metals (ICMM) voluntarily as part of international best practices, as follows:

1. Implement and maintain ethical business practices and sound systems of corporate governance.
2. Integrate sustainable development considerations within the corporate decision-making process.
3. Uphold fundamental human rights and respect cultures, customs and values in dealings with employees and others who are affected by our activities.
4. Implement risk management strategies based on valid data and sound science.
5. Seek continual improvement of our health and safety performance.
6. Seek continual improvement of our environmental performance.
7. Contribute to conservation of biodiversity and integrated approaches to land use planning.
8. Facilitate and encourage responsible product design, use, re-use, recycling and disposal of our products.
9. Contribute to the social, economic and institutional development of the communities in which we operate.
10. Implement effective and transparent engagement, communication and independently verified reporting arrangements with our stakeholders.

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#### 4.6.2 International Cyanide Management Code

OMAS is seeking to align its activities with the "*International Cyanide Management Code for the Manufacture, Transport, and Use of Cyanide in the Production of Gold*" (the Cyanide Code). The Principles in the Code are as follows<sup>1</sup>:

- **PRODUCTION** - Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner.
- **TRANSPORTATION** - Protect communities and the environment during cyanide transport.
- **HANDLING AND STORAGE** - Protect workers and the environment during cyanide handling and storage.
- **OPERATIONS** - Manage cyanide process solutions and waste streams to protect human health and the environment.
- **DECOMMISSIONING** - Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.
- **WORKER SAFETY** - Protect workers' health and safety from exposure to cyanide.
- **EMERGENCY RESPONSE** - Protect communities and the environment through the development of emergency response strategies and capabilities.
- **TRAINING** - Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.
- **DIALOGUE** - Engage in public consultation and disclosure.

#### 4.7 Summary of Applicable Project Standards

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

Applicable Project Standards are summarised below.

Standard	Scope
EBRD Performance Requirement 10: Information Disclosure and Stakeholder Engagement	<ul style="list-style-type: none"> <li>Stakeholder identification, stakeholder engagement planning, information disclosure, grievance management</li> </ul>

## 5 PROJECT CONTEXT

### 5.1 Project Description

The "Öksüt Gold Project" is a proposed gold mine in south-central rural 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).

<sup>1</sup> <http://www.cyanidecode.org/about-cyanide-code/cyanide-code#principles>

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The Project is a conventional open pit truck and shovel operation undertaken by a third-party mining contractor, supervised by OMAS, with an eight-year mine life.

Gold will be extracted from the ore via a heap leach facility. This will remove the need for a tailings management facility (a tailings dam). Gold will be processed using cyanide, and all transport, storage and handling will be undertaken in accordance with the International Cyanide Management Code, to which Centerra is a signatory.

The Project will have a short mine-life of approximately eight years, after which a closure, decommissioning and after-care programme will be implemented to ensure the safety and stability of the mining area and to return as much land as possible to its former land-use.

### 5.2 Project Area

The Social Project Area is defined as the neighbourhoods and land between them, surrounding the Project Area (the EIA Permitted Area and infrastructure corridors), the power line corridor (200 m from the centre of the corridor) and three neighbourhoods immediately to the south of this corridor. Settlements within the Social Project Area are defined as: Öksüt, Gazi, Sarıca, Zile, Tombak, Yukarı Develi, Yazıbaşı, Gömedi, Epçe and Develi; neighbourhoods in the Powerline Social Study Area are Çayırözü, Soysallı and Sindelhöyük.

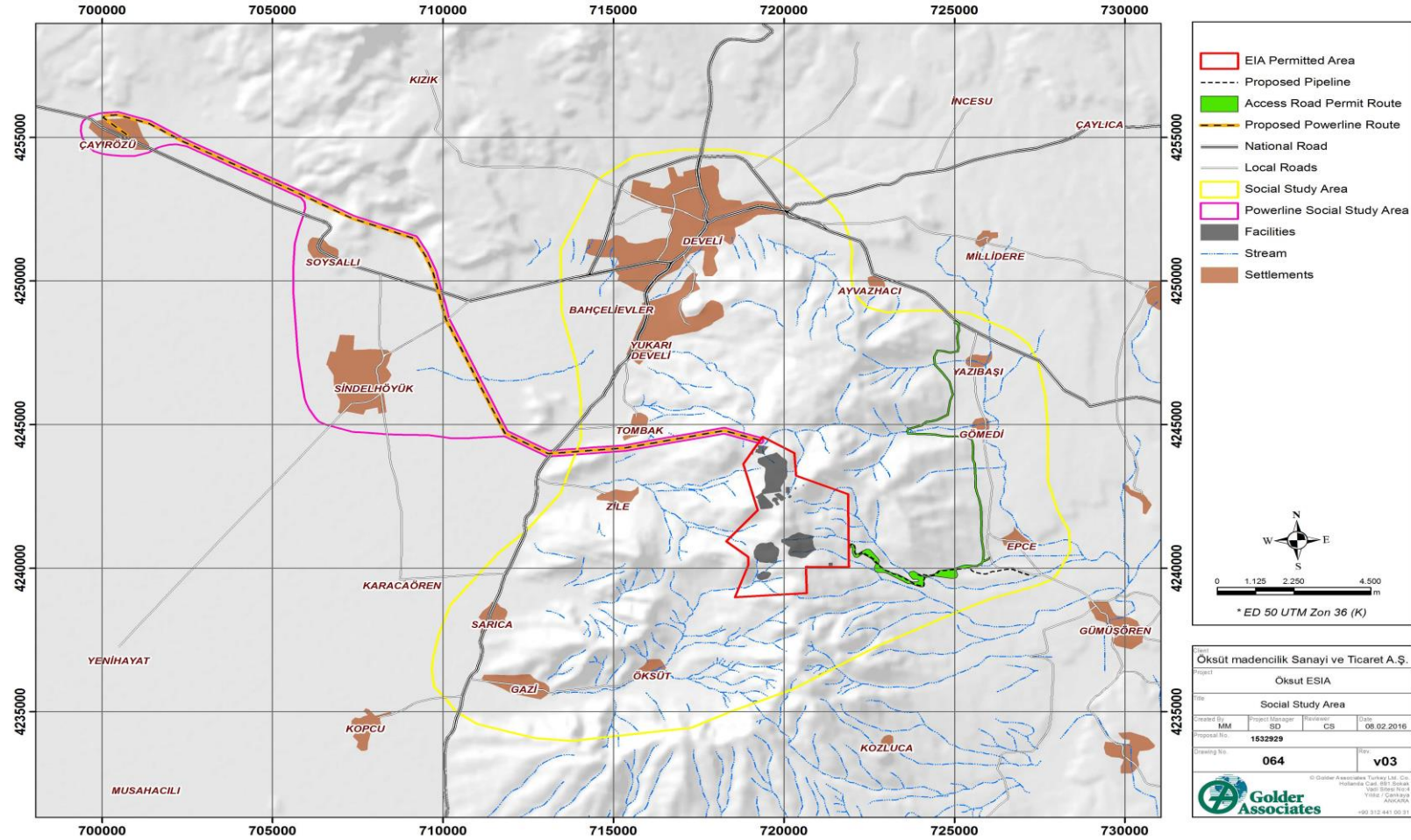
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Figure 1: Social Project Area





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### 5.3 Project Social Setting

The social setting of the Project in terms of local settlements, population, distance to mine operations and likely impacts and risks is set out below.

**Table 4: Summary of Project Social Setting**

Settlement	Type	Population <sup>2,3</sup>	Distance to Mine	Likely Impacts & Risks
Develi District	-	64,550	-	-
Develi Town	District Centre	39,342	8 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Population influx</li> <li>Local procurement opportunities</li> </ul>
<b>Yukarı Develi</b> <ul style="list-style-type: none"> <li>Yedek</li> <li>Kopçullu</li> <li>Camikebir</li> <li>Güney Yukarı</li> </ul>	Quarter of Develi	898 <sup>4</sup>	4 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Loss of pasture land</li> </ul>
Gazi	Neighbourhood	1,125	8 km	<ul style="list-style-type: none"> <li>Local recruitment</li> </ul>
Öksüt	Neighbourhood	590	4 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Loss of pasture land</li> <li>Sense of place</li> <li>Air/noise/dust/visual impacts</li> </ul>
Sarıca	Neighbourhood	340	8 km	<ul style="list-style-type: none"> <li>Local recruitment</li> </ul>
Tombak	Neighbourhood	227	5 km	<ul style="list-style-type: none"> <li>Local recruitment</li> </ul>
Zile	Neighbourhood	403	4 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Increased traffic density</li> <li>Air/noise/dust/visual impacts</li> <li>Loss of pasture land</li> <li>Partial loss of water source</li> <li>Sense of place</li> </ul>
Epçe	Neighbourhood	843	7 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Increased traffic density</li> <li>Air/noise/dust/visual impacts</li> <li>Loss of pasture land</li> <li>Potential influence on local water source</li> </ul>

<sup>2</sup> TurkStat, ABPRS 2014

<sup>3</sup> Çayırözü, Soysallı, Sindelhöyük figures obtained from <http://www.yerelnet.org.tr> and are from 2012.

<sup>4</sup> Estimated during key informant interview, December 2014

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Settlement	Type	Population <sup>2,3</sup>	Distance to Mine	Likely Impacts & Risks
Gömedi	Neighbourhood	83	7 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Increased traffic density</li> <li>Air/noise/dust/visual impacts</li> <li>Loss of pasture land</li> </ul>
Yazıbaşı	Neighbourhood	292	9 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Increased traffic density</li> <li>Air/noise/dust/visual impacts</li> <li>Loss of pasture land</li> </ul>
Çayırözü	Neighbourhood	695	24 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Powerline installed</li> </ul>
Soysalli	Neighbourhood	1,310	17 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Powerline installed</li> </ul>
Sindelhöyük	Neighbourhood	4,334	13 km	<ul style="list-style-type: none"> <li>Local recruitment</li> <li>Powerline installed</li> </ul>

## 6 STAKEHOLDER IDENTIFICATION

Stakeholder identification and engagement commenced in early 2013 during geological exploration activities to introduce the Project to local communities. Engagement continued through 2013-14 and in late 2014, OMAS undertook an extensive stakeholder identification and engagement process as part of the development of a socio-economic baseline study for settlements within the Social Project Area.

### 6.1 Methodology

Stakeholders have been identified based on proximity to Project features, potential degree of impact and interest in and concerns about the project (including in relation to government authorities and other public and private-sector organisations).

### 6.2 Stakeholder Categorisation

OMAS defines communities and stakeholders as two distinct groups:

- The term **community** is generally applied to the inhabitants of immediate and surrounding areas that may be affected in some way by a company's activities; these effects may be economic and social as well as environmental in nature. Stakeholders are those who have an interest in a particular decision, either as individuals or representatives of a group including people who influence a decision or can influence it, as well as those affected by it.
- Stakeholders** include non-governmental organisations, governments, shareholders and employees as well as non-affected community members.



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### 6.2.1 Communities of Interest

The communities of interest to OMAS comprise:

- Those neighbourhoods within the immediate vicinity of the mine licence area and within the Social Study Area;
  - Öksüt
  - Zile
  - Gazi
  - Sarıca
  - Tombak
  - Epçe
  - Gömedi
  - Yazıbaşı
- Neighbourhoods within the Powerline Social Study Area;
  - Çayırözü
  - Soysallı
  - Sindelhöyük
- Yukarı Develi (a Quarter of the municipality of Develi);
- The municipality of Develi;
- Vulnerable members of affected communities;
- Employees and contractors of OMAS;
- Shepherds who use land within the EIA Permitted Area.

Of particular interest are those people affected by the activities of the Project including:

- Land owners and pastureland land users within the EIA Permitted Area;
- Land owners and land users outside the EIA Permitted Area whose use of land may be affected by dust generated from mining and ore processing activities;
- Pastureland users whose access to pastureland will be affected by the Access Road;
- Land owners and land users along the route of the powerline;
- Farmers in Epçe whose access to water from existing water wells may be affected by water abstraction by OMAS.

### 6.2.2 Stakeholders

Key stakeholders with an interest in OMAS and the Öksüt Project include:

- Develi District
  - Develi Governor
  - Develi Municipality
  - Develi Gendarmerie
  - Develi Education Department

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- Develi Chamber of Commerce
- Develi Public Hospital
- Develi Department of Health Affairs
- Develi Public Education Department
- Develi Electricity Affairs (KCETAS)
- Develi Land Registry Department
- Develi Food, Agriculture and Livestock Department;
- Develi Forestry Department.
- Kayseri City
  - Kayseri Governor
  - City Directorate of Environment and Urbanization
  - City Directorate of Food, Agriculture and Livestock
  - Kayseri Metropolitan Municipality
  - City Directorate of Health
- Regional
  - Regional Directorate of Hydraulic Works
  - Regional Directorate of Forestry
  - Regional Directorate of Protection of Cultural Heritage
  - Sultan Sazlığı National Park administration
- National
  - Ministry of Environment and Urban Planning
  - Ministry of Energy and Natural Resources
    - Directorate of Mining Affairs
  - Ministry of Food, Agriculture and Livestock
  - Ministry of Forestry
- Academic institutions
  - Middle East Technical University, Mining Engineering Department
  - Ankara University, Department of Real Estate Development and Management
- Civil society, NGOs and community-based organisations
  - Regional Environmental Centre, Turkey
  - Chamber of Environmental Engineers
  - Nature Conservation Centre
  - Bird Life International
  - Nature Foundation (Doga Dernegi),
  - KAD (Kus Arastirmalari Dernegi- bird research association)
  - Turkish Union of Trade and Chambers and Commodity Exchanges

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- Environment Foundation of Turkey
- Community-based organisations within Develi District
- Regional NGOs within Kayseri Province
  - Middle Anatolia Development Agency
  - Union of Chambers of Turkish Engineers and Architects
  - Kayseri Chamber of Trade
- Business owners and service providers to OMAS
- Business and industry associations
  - Gold Mines Association of Turkey
  - Kayseri Chamber of Commerce
- Media interest groups
  - Çağdaş Develi newspaper
  - Çağrı Newspaper
  - Seyrani Newspaper

### 6.2.3 Vulnerable People and the Consultation Process

Vulnerable people can be defined as: female-headed householders, child-headed householders, disabled people, uninsured people, illiterate people, and the very poor and rural dwellers without secure access to land. All of these categories, except for child-headed households, are identified in the study area.

These groups will continue to be focused on during ESIA consultation and ongoing engagement by OMAS throughout the life of the mine. When focus group discussions and other community-level engagement is undertaken by OMAS, those identified as vulnerable and marginalised will be specifically targeted to ensure they have equivalent opportunities to participate. This includes engagement with specific groups such as:

- women, on targeted employment or supply chain opportunities;
- children and the elderly, on road safety measures.

## 7 STAKEHOLDER ENGAGEMENT TO DATE

### 7.1 Early Engagement

Stratex began stakeholder engagement in and around Öksüt in 2007. The Project has been active in stakeholder engagement since the 2009 Joint Venture, and took over full management in 2013. OMAS commenced engagement with local stakeholders from Q3 2013 and included community leaders from Öksüt, Zile, Tombak, Sarıca, Gazi and Develi and community members from Öksüt, Zile, Tombak, Sarıca and Gazi. Epçe community members and leaders were also included the stakeholder engagement process. 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.

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### 7.2 Engagement For the Turkish EIA

The EIA Application File for the Öksüt Project was submitted to the Ministry of Environment and Urban Planning on July 7, 2014. As part of the EIA process, a Community Participation Meeting was held at the Old Municipal Wedding Hall in Zile on August 7, 2014. Approximately 60 people attended the meeting following announcements in national and local press.

Participants comprised representatives of the Ministry of Environment and Urban Planning, the Provincial Environment and Urban Planning Directorate of the Office of Governor of Kayseri, local business representatives and local residents.

**Figure 2: Engagement Activities by OMAS During EIA Consultation**



**Public Disclosure Meeting (Öksüt)**



**Key Informant Meeting (Öksüt)**



**Public Disclosure Meeting (Sarica)**



**Key Informant Meeting (Sarica)**

A community relations team has been established by OMAS and an information office has been opened in Develi. A Stakeholder Engagement Plan is in place to ensure that there is regular ongoing engagement with direct and indirect stakeholders, to inform them of project plans and developments on an ongoing basis and gather any complaints or feedback.

A register of stakeholder engagement activities is included as Annex U the ESIA.

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### 7.3 Engagement Related to the Social Baseline

As part of the socio-economic baseline survey, and in support of ongoing community engagement, engagement activities (which also enabled follow up questions to be directed to OMAS Community Relations) included:

- Household surveys in Öksüt and Zile as the two villages closest to the mine site;
- Qualitative surveying (Focus Group discussions and Key Informant interviews) in Öksüt, Zile, Gazi, Sarıca, Tombak, Yazıbaşı, Epçe, Gömedi, Yukarı Develi, Çayırözü, Soysallı and Sindelhöyük and Develi.

Muhtars in each settlement within the Study Area were proactively engaged by OMAS as part of the EIA and for the socio-economic baseline study. For the key villages of Öksüt and Zile, detailed registers of all residents were prepared as the basis for detailed household surveys. Vulnerable and marginalised groups such as the elderly and female-headed households were identified and focus group discussions in all settlements were undertaken for both men and women. Additionally, key informants were consulted on specific issues related to informants' areas of expertise / responsibility to inform the baseline study.

Targeted follow up engagement has additionally been undertaken to supplement the existing baseline data, specifically, with shepherds potentially impacted by loss of access to the EIA Permitted Area.

### 7.4 Summary of Issues Raised by Stakeholders

Communities of Interest and other Stakeholders have raised a range of issues. The key issues are summarised below as Frequently Asked Questions, responses for which were developed by OMAS at each stage of engagement listed.

**Table 5: Issues Raised by Stakeholders During Early Engagement**

Stakeholder group	Frequently Asked Questions
Local communities	Will there be relocation of the villages due to mine operation?
Local communities	What are the possible effects of cyanide to our life and livelihood?
Local communities	What are the main environmental precautions to protect the water sources and crops from dust, and the chemicals?
Local communities	What are the main protection measurements for the drinking and irrigation water which is newly came to the villages from Zamantı Tunnel?
Local communities and Local Governmental Affairs	From which sources will you supply the water for the mine construction and the operation?
Local communities	Will you use the village roads to access the mine site in the future?
Local communities and Local Governmental Affairs	What will be the benefits of the mine for the locals? Will there be employment opportunity for the locals?
Local communities	What will be the strategy of the company regarding access to the pasture lands?

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**Table 6: Issues Raised by Stakeholders During Pre-Construction Engagement**

Stakeholder group	Frequently Asked Questions
Local communities	When the construction and operation works will start?
Local communities	How will the company manage the local employment process?
Local communities	What are the possible effects of cyanide to the community health, water sources, soil, and the environment? What are the precautions for cyanide usage?
Local communities	Where the mine road will be constructed?
Local communities	How the company will manage the mine wastes?

## 7.5 Summary of Consultation & Disclosure Methods, Tools & Activities

OMAS uses a variety of community stakeholder engagement tools and methodologies to ensure effective consultation. As part of development of this SEP, the various methods of stakeholder consultation used by OMAS have been analysed to determine their suitability for reaching different stakeholder groups.

OMAS has developed a forward-looking Action Plan for consultation (i.e. for the construction period and through to operations and eventual closure) which incorporates the most effective methods used to date. The Action Plan is provided in Section 8.

OMAS will continue to periodically evaluate the effectiveness of its engagement processes based on feedback from community members and stakeholders.

### Primary Consultation and Disclosure Methods, Tools & Activities

The primary methods of engagement with communities and stakeholder groups are as follows:

#### Methods applied with Communities of Interest:

- Household Visits/Consultation
- Participation in Community Development Programmes
- Pastureland User Groups
- Focus Group Discussions and Workshops
- Local Community Meetings
- Surveys and Interviews
- Public Events, Education & Outreach
- Site Tours
- Newsletter

#### Methods applied with Stakeholder Groups:

- Meetings and Sessions with Turkish governmental authorities
- Site tours



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- Meetings with NGOs and interest groups
- Media
- Info sheets, newsletters and magazine
- OMAS Website
- Annual Reports
- Corporate Responsibility, GRI, Conflict-Free Gold Standard and EITI Reporting

Table 7 below shows which key methods and tools are primarily used to engage with different stakeholder groups.

**Table 7: Engagement and Disclosure Methods for Different Stakeholder Groups**

Stakeholder group	Key engagement and disclosure methods
Economically displaced shepherds in the EIA Permitted Area	Individual and group meetings with shepherds, surveys, focus group meetings, workshops, and livelihood restoration programs (as agreed), local disclosure materials
Land owners and land users along powerline and access road	Land use assessment to identify potential land owners and land users who may be affected by the project. Individual and group meetings, surveys, focus group meetings and livelihood restoration programs (as agreed), local disclosure materials
Local communities	Tea house meetings, surveys, focus groups and workshops, open houses, OMAS branch offices meetings, Open Days, other local working groups, local disclosure materials
Vulnerable Groups	Household visits, individual meetings, specific invitation to focus groups and workshops, local disclosure materials
Local/Regional Authorities	Formal meetings, individual meetings, focus groups and workshops, OMAS site visits, local disclosure materials
Local Businesses	Individual discussions, questionnaires, focus groups and workshops, supplier development programme
Local CBOs/NGOs	Open Days, OMAS information office, individual meetings, focus groups and workshops, community development programmes (as partners)
Project Employees	OMAS site office and internal communications, website, individual discussions
General Public	Newspapers, radio, public meetings, website
Businesses and Industry Associations	Kayseri Chamber of Commerce meetings, industry events, individual meetings, supplier development programme
National/International NGOs	Site tours, individual meetings, website, workshops, community development programmes (as partners)

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Stakeholder group	Key engagement and disclosure methods
Financial Institutions	Individual meetings, website, workshops
Media	Interviews, press releases/newspaper articles, website

### Engagement with economically displaced shepherds

**Home Settlement of Pastureland Users** –Zile, and Yukarı Develi.

**Land Usage Category** – Traditional Usage.

**Land Ownership** – Governmental Land, no privately owned land and no title deed.

**Pastureland Usage Type** – Mainly grazing the sheep, and proportionally less goats and cattle.

**Engagement Methods with the Shepherds** – group meetings at each settlement (Zile, Yukarı Develi) individual meetings, visits to the grazing lands, workshops, livelihood restoration measures (as agreed).

### Scope of the Engagement –

- to update the shepherds on OMAS's activities, and the Governmental permitting process which includes the pastureland usage permission;
- to convey the good intention of OMAS to minimise the possible negative effects of the mine activities to access to the pasturelands and appropriately compensate for shepherds loss of access to the pasture and water for the Project duration;
- to obtain census data about shepherds (baseline against which livelihood status can be measured) as part of the development of a Livelihood Restoration Plan;
- to understand and respond to their concerns/suggestions about the Project;
- to understand, develop and agree livelihood restoration measures for shepherds;
- to implement livelihood restoration measures successfully against agreed KPIs.

### Engagement with Other Land Users Along Powerline and Access Road

**Home Settlement of Land Users** – Access Road - Yazıbaşı, Gömedi, Epçe; Power line - Çayırözü, Soysallı, Sindelhöyük, Tombak.

**Land Usage Category** – Agriculture, sheep grazing.

**Land Ownership** – Governmental Land, no privately owned land and no title deed along Access Road. Limited private land along powerline.

**Pastureland Usage Type** – Mainly grazing the sheep, and proportionally less goats and cattle.

**Engagement Methods with the Shepherds** – group meetings at each settlement along access road (Yazıbaşı, Gömedi, Epçe), key informant interviews with Muhtars along powerline (Çayırözü, Soysallı, Sindelhöyük, Tombak) individual meetings, visits to the grazing lands, workshops, livelihood restoration measures (as agreed).

### Scope of the Engagement –

- to identify land owners and land users;
- to update land users on OMAS's activities, and the Governmental permitting process which includes the pastureland usage permission;
- to convey the good intention of OMAS to minimise the possible negative effects of the mine activities to access to the pasturelands and appropriately compensate for shepherds loss of access to the pasture and water for the Project duration;



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- to obtain information on owners and users of land as part of the development of a Livelihood Restoration Plan;
- to understand and respond to their concerns/suggestions about the Project;
- to understand, develop and agree livelihood restoration measures for shepherds;
- to implement livelihood restoration measures successfully against agreed KPIs.

#### **Engagement with the Governmental Authorities**

- Secure communication with Develi District Management of Food, Agriculture, and Livestock and the Pastureland Branch Office of Kayseri Provincial Directorate of Food, Agriculture, and Livestock, and their site personnel (Veterinaries, Agricultural Engineers);
- Information sharing with the above mentioned authorities about the Turkish EIA, ESIA, and other ongoing studies;
- Information gathering from the official records as needed;
- Information sharing with the District Governor and the Mayor regarding ongoing studies and activities, including livelihood restoration;
- Information sharing with the Develi District Management of Food, Agriculture, and Livestock, and Develi Public Education Centre including on possible training partnerships.

## **8 STAKEHOLDER ENGAGEMENT PLAN**

Stakeholder engagement is an ongoing activity throughout planning, construction, operations and closure. The following tables summarise key planned stakeholder engagement during these different phases.

The Stakeholder Engagement Action Plan (Action Plan) is based on an evaluation of the stakeholder engagement programme to date. The Action Plan identifies target groups and the specific range of engagement activities required for each group.

The Action Plan will be reviewed regularly, at least every six months during construction and annually during operations, to ensure that it remains valid and meets the needs of OMAS, local communities and other relevant stakeholders as identified in this SEP.

The ESIA will be disclosed prior to the commencement of construction (see Section 10).

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**Table 8: OMAS External Stakeholder Engagement during Construction**

ID	Target Group	Purpose	Tasks/Methods	Schedule or Frequency	Responsible
SEP01	Local communities Local government Local business	<b>Information sharing</b> <ul style="list-style-type: none"> <li>Purpose and nature of the construction activities</li> <li>Early notification of Construction start date, scheduling and duration</li> <li>Potential impacts and health and safety measures/mechanisms</li> <li>Closure options and impacts on the local communities</li> </ul>	Monthly Community Meetings Women Meetings Focus group Meetings Media Open door event Newsletter	Monthly / when needed	CR
SEP02	Local communities Local government Local business Contractors	<b>Recruitment and Procurement</b> <ul style="list-style-type: none"> <li>Recruitment of employees</li> <li>Training of staff</li> <li>Procurement of supplies and services</li> <li>Design of Capacity development program for local people through targeted training programs internally and with key external training partners</li> </ul>	Information leaflet (policies and strategies) Monthly Community Meetings Media releases	When Needed / When Requested During construction	Project Team, CR, HR, Procurement
SEP03	Local communities Contractors Employees Shepherds (economic displaced)	<b>Comments and grievance mechanism</b> <ul style="list-style-type: none"> <li>Training on Grievance Procedure</li> <li>Grievance Resolution Process (including in response to security, construction or mining contractor issues)</li> <li>Provide training on Company policies (employees and contractors) on respectful and appropriate behaviours with communities</li> <li>Periodic monitoring of contract implementation with communities.</li> <li>Grievance resolution and monitoring of agreed compensation measures</li> </ul>	Grievance register Interviews Suggestion boxes Mails and calls	When Needed / When Requested	CR
SEP04	Local communities Government NGOs Local businesses	<b>Community development</b> <ul style="list-style-type: none"> <li>Identification and prioritization of community needs</li> <li>Assessment of available and required resources</li> <li>Formation of partnerships with government and</li> </ul>	Workshops Survey Monthly Community Meetings Meetings with NGOs	When Needed / When Requested	CR

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ID	Target Group	Purpose	Tasks/Methods	Schedule or Frequency	Responsible
	Local social services	community groups for development and implementation of sustainable community development projects in partnership with key stakeholders <ul style="list-style-type: none"> <li>Promotion of positive interactions and promote social cohesion between the workforce and Develi municipality citizens, (e.g. sport, recreation, worship, or other activities.)</li> </ul>	Posters Media	Monthly	
SEP05	Government ( <i>muhtars</i> , municipality)	<b>Population dynamics</b> <ul style="list-style-type: none"> <li>Track any speculative migration by jobseekers to the study area with <i>muhtars</i> and the municipality</li> <li>Reasonable efforts taken on liaison by the Project with Government agencies to include any issues of law enforcement requirements and/or anti-social behaviour due to the Project.</li> </ul>	Key informant interviews  Meetings with <i>muhtars</i> and municipality	As requested / when needed,  At least every six months	CR
SEP06	Contractors	<b>Contractor responsibilities</b> <ul style="list-style-type: none"> <li>monitoring of contract tasks and responsibilities for maintaining stakeholder relationships, and on workforce requirements and timeframes, between contractors and OMAS.</li> </ul>	Monthly Community Relations meetings	Monthly	CR Contractor
SEP07	Communities <i>muhtars</i> Municipality	<b>Reporting back on monitoring results:</b> <ul style="list-style-type: none"> <li>Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on results (i.e. on nuisance issues, water, livelihood restoration, accidents/incidents)</li> <li>Potential stakeholder participation in water monitoring (e.g. participatory water monitoring), should this be an area of ongoing concern with stakeholders and agreed as a mitigation action.</li> </ul>	Monthly Community Relations meetings Leaflets Workshops	Monthly	CR

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ID	Target Group	Purpose	Tasks/Methods	Schedule or Frequency	Responsible
SEP08	Communities Turkish Crisis Brigade Other emergency response organisations Contractors	<b>Cyanide code compliance / emergency preparedness</b> <ul style="list-style-type: none"> <li>Develop appropriate emergency response strategies and capabilities with potentially affected stakeholders</li> <li>Engage in public consultation and disclosure about issues of concern with potentially affected stakeholders</li> <li>Ongoing stakeholder engagement with emergency response organisations (including the Turkish Crisis Brigade)</li> </ul>	Workshops Survey Six monthly Community Meetings Meetings with NGOs  Posters	When Needed / When Requested  Six Monthly	CR
SEP09	Affected land users and land owners TEIAS Construction contractors Employees	<b>Biodiversity management</b> <ul style="list-style-type: none"> <li>Discuss restrictions to grazing lands that may be required for biodiversity offsets and develop mechanisms to ensure that grazer livelihoods are not adversely impacted</li> <li>Discuss forestry management issues, related to the protection and enhancement of Oak forest through transplantation and tree preservation</li> <li>Discuss road kill prevention, particularly related to the Common Tortoise, and implementation of speed limits and training of workers and local land users</li> </ul> <p>Training employees and contractors in OMAS approach of no hunting within EIA Permitted Area</p>	Workshops Individual and community meetings Focus group discussions Meetings with relevant NGO and CBOs	When needed to support offset planning	Biodiversity expert, CR
SEP10	Sultan Sazlığı National Park administration Conservation NGOs	<b>Protected Areas</b> <p>Discuss options to support the National Park to identify best options in case offset measures relating to the powerline need to be implemented</p>	Individual meetings	When needed to support offset planning	Biodiversity expert

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**Table 9: OMAS External Stakeholder Engagement during Operations**

ID	Target Group	Purpose	Tasks/Methods	Schedule or Frequency	Responsible
SEP11	Local communities Contractors Suppliers Relevant regulatory authorities	<b>Employment and procurement</b> <ul style="list-style-type: none"> <li>Recruitment of employees</li> <li>Training of staff</li> <li>Procurement of supplies and services</li> </ul>	Monthly Community Meetings Grievance register Leaflets Media	When Needed / When Requested  Monthly	Project Team, CR, HR, Procurement
SEP12	Local communities Government NGOs Local businesses Local social services	<b>Community development initiatives</b> <ul style="list-style-type: none"> <li>Identification and prioritization of community needs</li> <li>Assessment of available and required resources</li> <li>Formation of partnerships with government and community groups</li> </ul>	Workshops Survey Monthly Community Meetings Meetings with NGOs Posters Media	When Needed / When Requested  Monthly	CR
SEP13	Local communities Local government Emergency services (fire services, police, ambulance services) NGOs	<b>Emergency preparedness and response for the community</b> <ul style="list-style-type: none"> <li>Develop appropriate emergency response strategies and capabilities with potentially affected stakeholders</li> <li>Engage in public consultation and disclosure about issues of concern with potentially affected stakeholders</li> <li>Ongoing stakeholder engagement with emergency response organisations (including the Turkish Crisis Brigade)</li> </ul>	Monthly Community Relations meetings Leaflets Workshops	When Needed / When Requested  Monthly	CR, HS&T, ENV
SEP14	Local communities Government officials	<b>On-going information sharing</b> <ul style="list-style-type: none"> <li>Project activities</li> <li>Social, environmental and health management and monitoring plans</li> <li>Closure options and impacts on the local communities</li> </ul>	Monthly Community Meetings Women Meetings Focus group Meetings Media Open door event Newsletter	Monthly / when needed  Six-monthly	CR
SEP15	Local communities Contractors Employees	<b>Comments and grievance mechanism</b> <ul style="list-style-type: none"> <li>Training on Grievance Procedure</li> <li>Grievance Resolution Process</li> </ul>	Grievance register Interviews Suggestion boxes Mails and calls	Monthly / when needed  Six-monthly	CR

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ID	Target Group	Purpose	Tasks/Methods	Schedule or Frequency	Responsible
SEP16	Vulnerable People <i>Muhtars</i> Municipality	<b>Population dynamics</b> <ul style="list-style-type: none"> <li>Work with <i>muhtars</i> / Municipality to support vulnerable people through community development programs</li> </ul>	Key informant interviews Meetings with <i>muhtars</i> and municipality	As requested / when needed, At least every six months	CR
SEP17	Local communities, Employees and Government Officials	<b>Mine closure design</b> <ul style="list-style-type: none"> <li>design specific initiatives to focus on identifying options for transferrable and sustainable, local economic development options to be documented and implemented through the Social Mine Closure Plan</li> <li>Design of Legacy commitments of training documented in the Mine Closure Plan</li> <li>reasonable efforts to support Government in identifying alternate sources of employment / business development opportunities for the retrenched workforce.</li> </ul>	Workshops Survey Six monthly Community Meetings Meetings with NGOs Posters	When Needed / When Requested Six Monthly	CR
SEP18	Hospitals / clinics / educators Media Communities	<b>Public health</b> <ul style="list-style-type: none"> <li>Road safety awareness training in neighbourhoods, targeting vulnerable groups such as children, including on safe crossing of the bypass and access roads</li> <li>Notification to public on general types, number and frequency of vehicles that can be anticipated through different phases of the Project</li> <li>Identify opportunities to support local public health campaigns that focus on prevention of communicable diseases and STIs</li> <li>Provide education awareness raising on healthy lifestyles focusing on: alcohol, personal and food hygiene, communicable diseases (including STDs, sexual and reproductive health) and non-communicable diseases; minimising risky behaviours and seeking treatment if required.</li> </ul>	Workshops Survey Six monthly Community Meetings Meetings with NGOs Posters	When Needed / When Requested Six Monthly	CR

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ID	Target Group	Purpose	Tasks/Methods	Schedule or Frequency	Responsible
SEP19	Communities Kayseri Museum	<b>Cultural Heritage</b> <ul style="list-style-type: none"> <li>Consultation with local communities related to cultural resources</li> <li>Communication and cooperation with the Contractors and the Kayseri Museum and/or other appropriately qualified archaeological specialists.</li> </ul>	Workshops Six monthly Community Meetings Meetings with NGOs	When Needed / When Requested  Six Monthly	CR
SEP20	Affected land users and land owners  Local community members  Workforce	<b>Biodiversity management</b> <ul style="list-style-type: none"> <li>Discuss and monitor any restrictions to grazing lands and mechanisms to ensure that grazer livelihoods are not adversely impacted that may be required for biodiversity offsets</li> <li>Discuss and monitor forestry management issues, related to the protection and enhancement of Oak forest through transplantation and tree preservation</li> <li>Discuss road kill prevention, particularly related to the Common Tortoise, and implementation of speed limits and training of workers and local land users</li> <li>Training employees and contractors in OMAS approach of no hunting within EIA Permitted Area</li> </ul>	Workshops Individual and community meetings Focus group discussions Meetings with relevant NGO and CBOs	When needed to support offset planning	Biodiversity expert, CR
SEP21	Sultan Sazlığı National Park administration  Conservation NGOs	<b>Protected Areas</b> <ul style="list-style-type: none"> <li>Discuss status of key species to identify any potential issues due to the powerline</li> <li>Discuss options to support the National Park to identify best options in case offset measures relating to the powerline need to be implemented</li> </ul>	Individual meetings	When needed to support offset planning	Biodiversity expert

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## 9 TOOLS & METHODS FOR INFORMATION DISCLOSURE

OMAS will develop disclosure materials that are clear, consistent and provided in a timely manner to local communities and other stakeholders. Prior to any disclosure, OMAS will conduct pre-disclosure planning to define a process for information disclosure that ensures that all key groups within Communities of Interest are given the opportunity to receive and comment on Project information.

### 9.1 Internet/Website

OMAS will update its website with relevant project information in Turkish language as a minimum. The ESIA will be made available on the website as will contact details for OMAS community relations staff.

### 9.2 Information Sheets

Information sheets on key project issues and OMAS' approaches to minimise, mitigate and manage will be prepared and made available on the OMAS website, in the representative office in Develi and copies will be provided to local village *muhtars* and made available in local village tea houses.

### 9.3 Public Media

As appropriate relevant project information will also be provided to public media. This will particularly be undertaken during ESIA consultation and construction, and will also occur if any major changes to the Project are envisaged which may impact local communities or land uses.

### 9.4 Responding to Local People

In addition to the Grievance Procedure implemented by OMAS for specific issues, OMAS will response to comments and questions from local residents in a full and timely manner.

## 10 CONSULTATION AND DISCLOSURE OF THE ESIA

### 10.1 During ESIA Development

OMAS has undertaken a limited consultation process for the Turkish EIA as described in *Section 8 of the Turkish EIA*. In addition, OMAS has undertaken a range of community engagement activities with communities of interest and other stakeholders including in relation to the socio-economic baseline study (during December 2014 and August 2015). Information on previous consultation and disclosure activities are described in *OMAS ESIA Chapter 6: Stakeholder Engagement and Consultation*.

### 10.2 ESIA Disclosure

Disclosure and consultation on the ESIA and Management Plans will ensure that the affected parties are fully aware of the environmental and social impacts that may affect them and OMAS's commitments towards minimising and managing such impacts. Disclosure and consultation also allows other interested parties to see the ESIA documentation and make comments on the content and receive feedback from OMAS in terms of comments received.

General activities include the following:



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- The ESIA, Management Plans, a non-Technical Summary (NTS), and other information sheets are released by OMAS on its website, and are also available in the OMAS representative office in Develi. Copies are also provided in local village tea houses and village *muhtar* offices.
- Disclosure of the ESIA documentation in Turkish and English, as relevant to the location where it is being disclosed.
- Fact Sheets on key ESIA themes/topics and commitments by OMAS to manage impacts were prepared in Turkish for local disclosure. Fact Sheets included information in a culturally- appropriate format for residents in local Communities of Interest.
- OMAS advises residents of Communities of Interest through leaflets, newsletters, tea house meetings and the media, how they can access a copy of the ESIA documentation, as well as the timetable and process for making comments on the ESIA.
- engagement with local communities and applicable local, regional and national authorities on the content of the ESIA/Management Plans to discuss key social and environmental impacts and mitigation measures that may affect them.
- OMAS provides appropriate mechanisms for stakeholders to provide feedback on the ESIA documentation, including through a response mechanism on the OMAS website, through comment books at *muhtar* offices in local Communities of Interest and through regular contact with community relations staff as part of routine consultation activities.
- Lenders provided Project information and website links to the OMAS website in accordance with applicable disclosure policies.

### 10.3 Accessing the ESIA During Disclosure

Disclosure and consultation on the ESIA will be undertaken to ensure that the affected parties are fully aware of the environmental and social impacts that may affect them and OMAS's commitments towards minimising and managing such impacts. Disclosure and consultation also allowed other interested parties to see the ESIA documentation and make comments on the content and receive feedback from OMAS in terms of comments received.

Key activities during the ESIA disclosure period included the following:

- the ESIA, Management Plans, a non-Technical Summary (NTS) and factsheets will be released by OMAS on its website (<http://oksutmadencilik.com.tr>) and will also available in:
  - the OMAS office in Ankara (Turan Güneş Bulv. Hollanda Cad. 3/5, Çankaya, Ankara);
  - the OMAS office in Develi (İbrahimağa mah. Cumhuriyet cad. Belediye İş Merkezi Kat:3 No:64);
  - The office of the Develi Municipality;
  - The office of the Develi Sub-Governor;
  - EBRD Resident Office (Eskişehir Yolu, Armada İş Merkezi, No:6 Kat:4, Söğütözü, 06520 Ankara).
- Copies of the ton-technical summary and factsheets will be made available that the following public offices:
  - The office of the Muhtar for Öksüt, Gazi, Sarıca, Zile, Tombak, Yukarı Develi, Yazıbaşı, Gömedi, Epçe, Develi Çayırözü, Soysallı and Sindelhöyük;
  - The office of the Develi Municipality;

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- The office of the Develi Sub-Governor.
- Disclosure meetings, open to all attendees, will be announced in local media and will be held at the following locations:
  - the office of the Develi Municipality (or other location as advertised).
- The offices of the Muhtar for Öksüt, Zile, Yukarı Develi, Yazıbaşı, Gömedi, Epçe (or other location as advertised); disclosure of the ESIA documentation will be in Turkish and English, as relevant to the location where it is being disclosed.
- Fact Sheets on key ESIA themes/topics and commitments by OMAS to manage impacts were prepared in Turkish for local disclosure. Fact Sheets included information in a culturally- appropriate format for residents in project-affected neighbourhoods.
- OMAS will advise people e.g. through a newsletters, ongoing meetings and the media etc., how they can access a copy of the ESIA documentation, as well as the timetable and process for making comments on the ESIA.
- OMAS will provide appropriate mechanisms for stakeholders to provide feedback on the ESIA documentation, including through a response mechanism on the OMAS website, through comment books at OMAS offices and through regular contact with community relations staff as part of routine consultation activities.
- EBRD will be provided with Project information and website links to the OMAS website in accordance with its own disclosure policies. EBRD will also upload the ESIA to their website (<http://www.ebrd.com/esia/html>).

During this phase, disclosure and consultation activities will be designed along the following general principles:

- Consultation events and opportunities will be widely and proactively publicised, especially among project affected parties, at least 1 week prior to any meeting.
- The non-technical summary is accessible prior to any event to ensure that people are informed of the assessment content and conclusions in advance of the meeting.
- The location and timing of any meeting will be designed to maximise accessibility to project affected stakeholders.
- Information presented will be clear and non-technical, and will be presented in the local language understood by those in the communities.
- Facilitation will be provided to ensure that stakeholders are able to raise their concerns.
- Issues raised are answered at the meeting or actively followed up.

Anyone can comment on the draft ESIA during the disclosure period. Feedback forms will accompany all the disclosure documentation.

#### **10.4 Tools & Methods for Information Disclosure**

OMAS will develop disclosure materials that are clear, consistent and provided in a timely manner to local communities and other stakeholders. Prior to any disclosure, OMAS will conduct pre-disclosure planning to define a process for information disclosure that ensures that all key groups within Communities of Interest are given the opportunity to receive and comment on Project information.

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### Internet/Website

OMAS will update its website with relevant project information in Turkish language as a minimum. The ESIA will be made available on the website as will contact details for OMAS community relations staff.

### Information Sheets

Information sheets on key project issues and OMAS' approaches to minimise, mitigate and manage will be prepared and made available on the OMAS website, in the representative office in Develi and copies will be provided to local village muhtars and made available in local village tea houses.

### Public Media

As appropriate relevant project information will also be provided to public media. This will particularly be undertaken during ESIA consultation and construction, and will also occur if any major changes to the Project are envisaged which may impact local communities or land uses.

### Responding to Local People

In addition to the Complaints and Grievance Procedure implemented by OMAS for specific issues, OMAS will respond to comments and questions from local residents in a full and timely manner.

## 11 MANAGEMENT OF COMPLAINTS AND GRIEVANCES

### 11.1 OMAS Contact Details

OMAS Community Relations Department can be contacted at the following address in order to raise questions, comments or complaints:

OMAS Develi CR Office: İbrahimaga mah. Cumhuriyet cad. Belediye İş Merkezi Kat:3 No:64, Develi  
Telephone: +90 530 399 5772.  
e-mail: info@oksutmadencilik.com.tr

### 11.2 OMAS Grievance Procedure

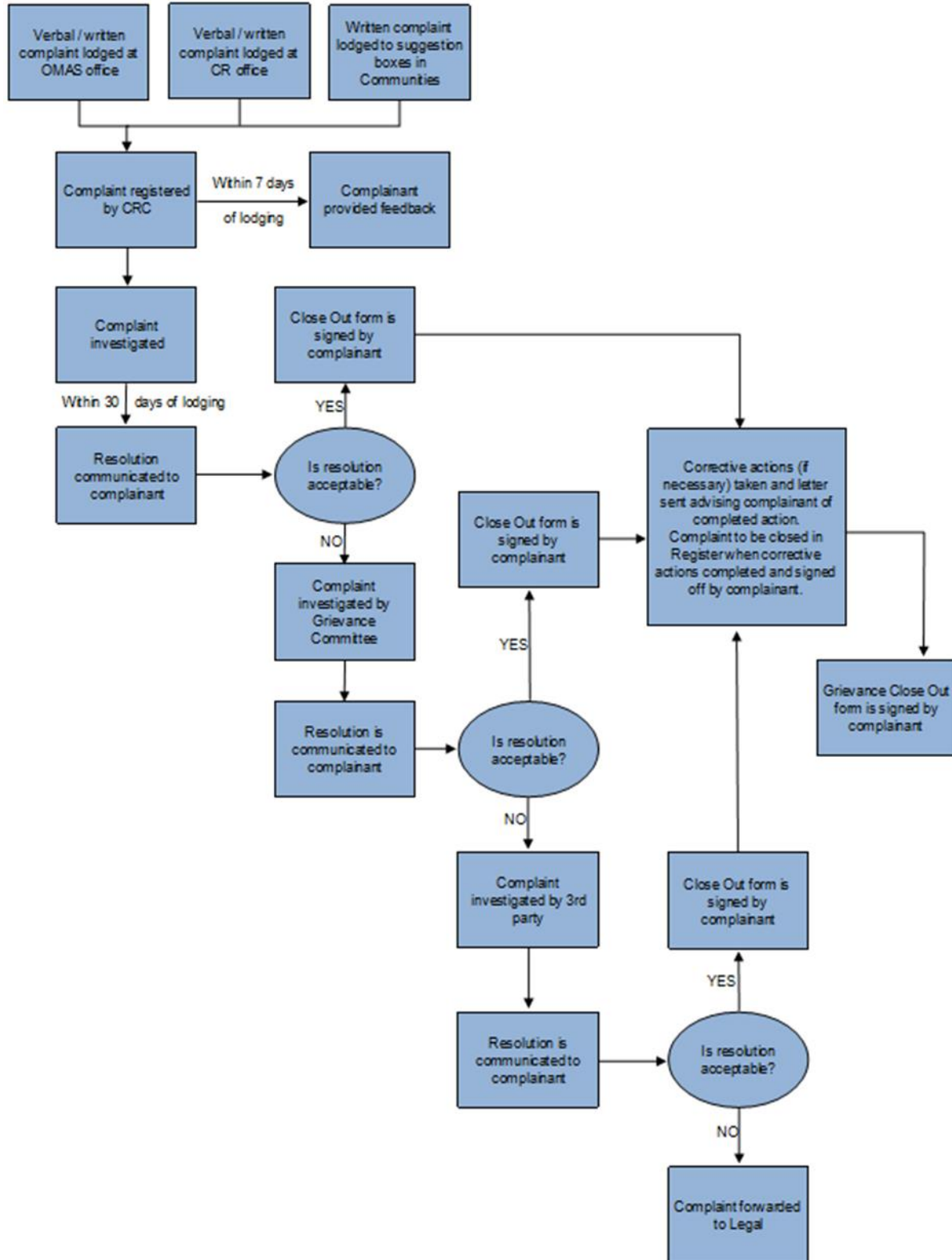
OMAS has a Grievance Procedure (OMAS-HSEC-PRC-005) which was implemented in October 2014. The process for addressing community complaints is via the following process:

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Sample Grievance Form for Completion and Submission by Stakeholders

		<h2 style="text-align: center;">ÖKSÜT GOLD PROJECT</h2> <h2 style="text-align: center;">GRIEVANCE FORM</h2>		
1.	Grievance Number			
2.	Date:	/ / 201.....		
3.	First Name			
	Last Name			
	Occupation			
	Contact Information:	<input type="checkbox"/> Telephone Number: (0____) _____ <input type="checkbox"/> E-mail address (if available) : _____ <input type="checkbox"/> Address: _____ _____ _____ _____		
4.	Description of Grievance including when it happened			
5.	Signature of Aggrieved			
6.	Received by			

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## 12 MONITORING

### 12.1 Overview of Monitoring Requirements

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

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

### 12.2 Key Performance Indicators

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

**Table 10: Key Performance Indicators and monitoring actions – Stakeholder Engagement**

ID	KPI	Target	Monitoring Measure
SEP-KPI 01	Number of community complaints or grievances	Total number reduced year on year	Complaints Log/Database
SEP-KPI-02	Number complaints resolved within one month	Target of 90%	Complaints Log/Database
SEP-KPI-03	Reporting back to stakeholders on implementation of the Grievance Procedure	Delivery of regular reports to stakeholders on the outcomes of the Grievance Procedure	Reporting
SEP-KPI 04	Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual audit complete  Target of 90% of grievances closed out to satisfaction of complainant within one month	Audit report.

### 12.3 Key Monitoring Activities

Key monitoring activities will focus on key health indicators to enable assessment of whether project activities and influx are having negative impacts of community health and safety. Data is collected and analysed by relevant demographic groups (including by gender).

Key monitoring measures are set out below.

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**Table 11: Key Monitoring Measures**

Topic/ Aspects	Methods	Responsible Parties	Frequency
Community Complaints	<p>OMAS will review Grievance Log/Database, including complaints <i>closed</i> and those <i>unresolved</i> per period (at a minimum monthly but more likely as they occur) to include:</p> <ul style="list-style-type: none"> <li>number of outstanding complaints and grievances opened in the month;</li> <li>number of complaints and grievances opened in the month and evolution since Project start (graphic presentation);</li> <li>number of complaints grievances closed in the month; and</li> <li>type of grievance.</li> </ul> <p>The OMAS CR team will provide regular reporting back to the community on the treatment of community grievances (including the type of grievance, how they have been addressed and the outcomes arising).</p> <p>An annual audit will be conducted of the Grievance Procedure.</p> <p>The Mediation Committee will be used to facilitate the implementation and monitoring of the Grievance Procedure.</p>	OMAS CR Manager	Monthly
Visitors to OMAS Develi Office	Community Relations Officers record visitors to OMAS offices and report in Monthly Department performance report. Include visitor numbers, type of visitor, reason for visit etc.	OMAS CR Manager	Monthly
Community engagement activities	Community Relations Officers record formal and informal engagement with local communities in Stakeholder Management System. This will include interactions with committees and working groups. Summarise in Monthly Department performance report.	OMAS CR Manager	Quarterly
Disclosure materials disseminated	Community relations staff will keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and report to the Community Relations Coordinator per period.	OMAS CR Manager	Quarterly
Feedback to local communities	The OMAS Community Relations team will monitor feedback to local communities by developing and implementing a Community Messaging System and Community Diaries.	OMAS CR Manager	Quarterly

## 13 TRAINING

### 13.1 Overview

All necessary training is provided as part of induction training (to provide general awareness) and job-specific training as necessary.

### 13.2 Induction Training

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All employees of OMAS and contractors are required to participate in community relations and human rights training as part of the standard induction programme. This training is designed to help Turkish and foreign workers on the OMAS Project understand and respect different cultures and points of view and operate effectively as team members, as well as and behave appropriately when they are within local communities.

### 13.3 Job-Specific Training

Specific training on stakeholder engagement and the application of the Grievance Procedure will be provided to Community Relations Officers and other personnel and supervisors of OMAS and contractors involved in or overseeing activities with local communities.

### 13.4 Other Training Requirements

Additional specialist training shall be provided to key personnel involved in community and stakeholder engagement on an "as needed" basis.

## 14 AUDIT AND REPORTING

### 14.1 Internal Auditing

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

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

### 14.2 Contractor Auditing

Contractors will be subject to inspection and audit by OMAS prior to a contractor's initial appointment and then on an annual basis as outlined in the Contractor Management Framework (OMAS-07-PLN-0001).

### 14.3 External Auditing

Conformance with this plan will be subject to periodic assessment by Centerra corporate audit and assurance programmes and separately by Project Lenders.

### 14.4 Record Keeping

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

## 15 DOCUMENT CONTROL

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