

TÜMAD

MADENCİLİK SANAYİ VE TİCARET A.Ş.



COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

TÜMAD Madencilik San. ve Tic. AŞ

Address: Buğday Sokak No:9
Kavaklıdere – Ankara - Turkey

Tel: +90.312.455.1600
Fax: +90.312.455.1601

info@tumad.com.tr

**COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN
for LAPSEKİ & İVRİNDİ PROJECTS**

Document approval	Signature	Date	TÜMAD Madencilik Sanayi ve Ticaret AŞ. Address: Buğday Sokak No:9 Kavaklıdere ÇANKAYA ANKARA	
Prepared by: Bilge KÜÇÜKAYTAN, IMS & Sustainability Man.				
Controlled by: Hayri ÖĞÜT, Consultant				
Approved by: Hasan YÜCEL, General Manager			Edition No/Date:	
			Document No: TMD_EYS_PLN.006	Rev 0

This document is updated and controlled, and the documents without control stamp are invalid.

REVISION HISTORY

Article/Paragraph	Revision	Revision Description	Date
-	0	First Issue	

TABLE OF CONTENTS

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS	2
REVISION HISTORY	3
TABLE OF CONTENTS	4
LIST OF TABLES	4
APPENDICES	4
ABBREVIATIONS AND DEFINITIONS	5
1 INTRODUCTION	6
2 PURPOSE	6
3 SCOPE.....	6
3.1 Overlap with Other Management Plans.....	7
4 Project standArds.....	7
4.1 Applicable Turkish National Standards:.....	7
4.2 Turkish EIA requirements:	8
4.3 Other Commitments to and Requirements of Turkish Government Authorities	8
4.4 Applicable International Standards and Guidelines.....	8
4.5 Applicable TÜMAD Standards, Policies and Procedures	9
5 ROLES AND RESPONSIBILITIES.....	12
6 MITIGATION MEASURES AND MANAGEMENT CONTROLS.....	13
7 MONITORING	26
7.1 Key Monitoring Activities	26
7.2 Key Performance Indicators	27
8 TRAINING.....	27
9 AUDIT.....	28
10 REPORTING.....	28
APPENDIX 1 – TÜMAD POLICIES	29

LIST OF TABLES

Table 1: Principles and standards of practice in Cyanide Management	10
Table 2: Principles and standards of practice in Cyanide Management, Continued	11
Table 3: Roles and Responsibilities	12
Table 4: Key CHSS Risks and Management Controls for the Lapseki and İvrindi Project	14
Table 5: Key Monitoring Activities	26
Table 6: Key Performance Indicators.....	27

APPENDICES

APPENDIX-1 TÜMAD POLICIES

ABBREVIATIONS AND DEFINITIONS

Project(s)	: Lapseki and İvrindi Gold and Silver Mine and Processing Projects
TÜMAD	: TÜMAD Madencilik San. ve Tic. A.Ş.
CHSS	: Community Health, Safety and Security
EBRD	: European Bank for Reconstruction and Development
EIA	: Environmental Impact Assessment
ESMS	: Environmental and Social Management System
EU	: European Union
HR	: Human Resources
IMS	: Integrated Management System
KPI	: Key Performance Indicator
MoEU	: Ministry of Environment and Urbanization
OHS	: Occupational Health and Safety
PR(s)	: Performance Requirements
SDS	: Safety Data Sheet

1 INTRODUCTION

TÜMAD Madencilik San. ve Tic. A.Ş. (TÜMAD) plans to establish the Lapseki Gold and Silver Mine and Processing Project (the Lapseki Project) within the administrative boundaries of the Şahinli and Kocabaşlar Villages of the Lapseki District in the Province of Çanakkale. The construction phase of the Lapseki Project has been at completion stage and the operation phase will start in October 2017.

TÜMAD plans to establish the İvrindi Gold and Silver Mine and Processing Project (the İvrindi Project) within the administrative boundaries of Değirmenbaşı and Küçükıllica Villages of the İvrindi District of Province of Balıkesir. The İvrindi Project have started with mobilization.

The project is seeking finance and this document is produced as a part of studies conducted to assess the Environmental and Social Impacts of the Project as per the EBRD Performance Requirements (PRs).

This Document is the Community Health and Safety Security Management Plan that is prepared for TÜMAD Operations. The Integrated Management System document registration number for Community Health and Safety Security Management Plan is TMD_EYS_PLN.006. This management plan sets the requirements for the operation phase of the Lapseki Project and for construction and operation phase of the İvrindi Project and is an integral part of the Environmental and Social Management System (ESMS) implemented by TÜMAD for the two mine projects.

This Management Plan is based on the Project(s) Environmental & Social Management System Management Plan (TMD_EYS_PLN.004) of TÜMAD, which is owned by the TÜMAD General Manager. Any subsequent changes to the TÜMAD ESMS may result in the changes to this document.

This Management Plan will be reviewed on a minimum of a six monthly basis during construction and commissioning. During operation phase, this Plan will be reviewed on an annual basis to determine whether any changes or updates are required to the Management Framework unless a more frequent update is required to reflect changing project design or ESMS requirements and 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 Management of Change Procedure (TMD_EYS_PRD.006).

2 PURPOSE

The purpose of this Management Plan 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, mitigation measures, operational procedures and guidance relevant to this Management Plan ;
- define monitoring and reporting procedures, including Key Performance Indicators;
- defined training requirements;
- set out references for supporting materials and information.

3 SCOPE

This Management Plan includes the mitigations for the management of health safety and security risks to communities and other third parties that may arise from the construction, commissioning, operational activities of the Lapseki and İvrindi Projects, including the main mine sites, project units, as well as all associated facilities such as transportation routes and energy transmission lines and water systems and all other activities that will be undertaken by the TÜMAD and Contractor workforce. Implementation by contractors is addressed in the Contractor Management Plan (TMD_ISG_PLN.003).

This Management Plan will be developed and updated as necessary with the natural development of the projects.

This document outlines TÜMAD's commitment and approach to mitigating community health safety and security risks that may arise as a direct or indirect result of the Lapseki and İvrindi Projects. Key risks addressed by this Management Plan include:

- Change in traffic density impacting other road users;

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS	Document No	Rev.	Page
	TMD_EYS_PLN.006	0	6/30

- Change in community expectations related to cyanide use;
- Introduction of new security presence and security personnel;
- Potential impacts on water resources
- Increased potential for communicable disease.

3.1 Overlap with Other Management Plans

This Management Plan is part of the overall suite of Management Plans developed for the TÜMAD Project and as part of ESMS overlaps with the following management plans;

- Traffic Management Plan (TMD_EYS_PLN.007), particularly in relation to management of impacts using the new access road and public roads.
- Air Quality Management Plan (TMD_CEV_PLN.006), particularly in relation to management of community exposure to dust generated by TÜMAD's activities.
- Noise and Vibration Management Plan TMD_CEV_PLN.002), particularly in relation to management of community exposure to noise generated by TÜMAD's activities.
- Water Resources Management Plan (TMD_CEV_PLN.003), particularly in relation to the protection of potable drinking water supplies.
- Explosives and Hazardous Substances Management Plan (TMD_İSG_PLN.006), safe use of explosives and particularly in relation to the transport, storage, use and disposal of hazardous materials.
- Stakeholder Engagement Plan (TMD_EYS_PLN.001), particularly in relation to communication with local communities and stakeholders throughout the life time of the mines
- Emergency Action Plans (TMD_LAP_İSG_PLN.001 6 TMD_IVR_İSG_PLN.001), particularly in relation to responding to off-site accidents and incidents.
- Spill Clean Up Plan (TMD_CEV_PLN.009), particularly in relation to responding to spills that would impact communities
- Cyanide Management Plan (TMD_CEV_PLN.008), particularly in relation to the transportation and storage of cyanide. A Cyanide Management Plan will be prepared by TÜMAD and its selected supplier in accordance with the International Cyanide Management Code and Turkish regulatory requirements prior to cyanide being transported to and stored on site.
- Mine Waste Management Plan (TMD_CEV_PLN.004), particularly in relation to the management of mine wastes that would impact communities.
- Complaint and Feedback Procedure (TMD_KTİ_PRD.001), particularly in relation to the management of complaints from communities and providing feedback.
- Labour Management Plan (TMD_IK_PLN.002), particularly in relation to the behaviour of TÜMAD and Contractor workers.

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;
- applicable international standards and guidelines;
- applicable Nurol Holding an TÜMAD standards, policies and procedures;
- Other industry guidelines with which TÜMAD has committed to comply or align with.

4.1 Applicable Turkish National Standards:

Turkish Environmental, Health and Safety Standards

The Constitution of Turkish Republic recognizes the right of all Turkish citizens to a healthy environment, as well as the duty of the State and of citizens to upgrade the environment, protect environmental health and prevent pollution.

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS	Document No	Rev.	Page
	TMD_EYS_PLN.006	0	7/30

Turkey is a party to all key international environmental conventions that provide appropriate policy frameworks and promote cooperation and coherent action at global, regional and national levels to address environmental problems.

A number of health and safety standards are in place in Turkey to directly protect the workforce in, and indirectly protect communities from, hazardous industries, including:

- Regulation for Manual Handling Operations in Workplaces
- Regulation on Health and Safety Measures in Working with Chemicals
- Regulation on Personal Protective Equipment
- Health and Safety Regulation for Mining Works
- Regulation on Health and Safety Signs
- Regulation on Dust Control
- Regulation on Occupational Health and Safety in Construction Works
- Regulation on the Protection of Workers from Noise Related Risks
- Regulation on Protection of Workers from the Risks of Explosive Atmospheres
- Regulation on the Protection of Workers from Vibration Related Risks
- Regulation on Procedures and Principles of Occupational Health and Safety Training of Workers
- Regulation on Health and Safety Restrictions of Equipment Usage in Workplaces
- Regulation on Duty, Authority and Responsibility and Training of Occupational Safety Specialists
- Regulation on Risk Assessment Regarding Occupational Health and Safety
- Regulation on Emergency Situations in Workplaces
- Communiqué on Major Accident Prevention Policy Documents (Official Gazette 29435, 4 August 2015).
- Regulation on Prevention and Effect Control of Major Industrial Accidents (Official Gazette 28867, 30 December 2013).

4.2 Turkish EIA requirements:

There are no specific requirement in the EIA and associated Permits submitted for the TÜMAD Projects directly related to community health safety and security

4.3 Other Commitments to and Requirements of Turkish Government Authorities

- The Regulation on Mining Waste was published in Official Gazette (29417) on 15 July 2015. It introduces principles for mining waste-management for exploration, extraction, enrichment or mine storage activities. The Regulation will enter into effect within 12 months of the Gazette publication date (15 July 2016).

The Regulation classifies mining waste into three categories: hazardous, non-hazardous and inert waste. Processes and requirements for disposing mining waste depend on its classification. The Regulation was prepared by the Ministry of Environment and Urban Planning, in line with the EU Directive on Mining Waste 2006/21/EC.
- 5188 Numbered Private Security Service Law, The aim of this Law is to ensure that private security services complementary to public security specify the principles and procedures for its fulfilment.

4.4 Applicable International Standards and Guidelines

EBRD requirements:

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

EBRD Performance Requirement 2: Labour and Working Conditions sets out security personnel requirements

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS	Document No	Rev.	Page
	TMD_EYS_PLN.006	0	8/30

EBRD Performance Requirement 4: Community Health, Safety and Security sets out requirements with regard to community health, safety and security. TÜMAD will comply with the requirements of EBRD Performance Requirement 4 when implementing its policies. Key requirements include:

- Identification and assessment of project-related risks and adverse impacts to the health and safety of the potentially affected communities and will develop protection, prevention and mitigation measures proportionate to the impacts and risks, and appropriate to the stage, size and nature of the project. Cooperation with the relevant authorities and other stakeholders, as appropriate, on mitigation measures and plans. These measures will be consistent with the mitigation hierarchy approach and good industry practice (GIP).
- Measures to avoid or mitigate community health and safety impacts of the project may be the responsibility of the relevant public authorities. Under these circumstances, the project will clarify its role and its responsibility to notify and cooperate with the relevant authorities.

The Voluntary Principles on Security and Human Rights: The Voluntary Principles on Security and Human Rights (VPs) were introduced in 2000 to provide guidance to extractives companies on maintaining the security of their operations in a manner that respects human rights and fundamental freedoms. The Voluntary Principles fall into three main categories:

- risk assessment
- relations with public security
- relations with private security

Risk assessment entails the ability to assess the risks present in a company's operating environment in relation to the security of personnel, local communities and assets as well as protection of human rights. In interactions between companies and public security, companies have an interest in ensuring that actions taken by governments, particularly those of public security providers, are consistent with the protection and promotion of human rights. Where private security providers are engaged in protecting a company's personnel or assets, the risk of private security contractors exceeding their authority will be minimised, and respect for and protection human rights have to be promoted.

TÜMAD will align its activities to the Voluntary Principles Guiding Principles on Business and Human Rights.

TÜMAD will also align its activities to the universal declaration of human rights (UDHR).

4.5 Applicable TÜMAD Standards, Policies and Procedures

- The United Nations has signed the Global Compact with Nurol Construction.
 - Nurol Construction, which has adopted the principle of fulfilling the requirements of environment, working standards, human rights and anti-corruption fields from its establishment according to institutional policies, increases the level of application in these fields day by day. Nurol Group Companies are aligning themselves with Global Compact requirements and the first one to become a signatory is Nurol Construction and TÜMAD will be involved in the progressive aspect.
- TÜMAD's Occupational Health & Safety, Environment and Social Policy is given in Appendix 1
- TÜMAD's Community Relations Policy is given in Appendix 1.

Other industry guidelines with which TÜMAD has committed to align with:

- International Cyanide Management Code

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

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

Principles and standards of practice in Cyanide Management are given in Table 1 and Table 2.

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS	Document No	Rev.	Page
	TMD_EYS_PLN.006	0	9/30

Table 1: Principles and standards of practice in Cyanide Management

Production	Transportation	Handling and storage	Operations	Decommissioning
<ul style="list-style-type: none"> Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner. 	<ul style="list-style-type: none"> Protect communities and the environment during cyanide transport. 	<ul style="list-style-type: none"> Protect workers and the environment during cyanide handling and storage. 	<ul style="list-style-type: none"> Manage cyanide process solutions and waste streams to protect human health and the environment. 	<ul style="list-style-type: none"> Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.
<p>Standard of practice;</p> <ul style="list-style-type: none"> Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment. 	<p>Standard of practice;</p> <ul style="list-style-type: none"> Establish clear lines of responsibility for safety, security, release prevention, training, and emergency response in written agreements with producers, distributors, and transporters. Require that cyanide transporters implement appropriate emergency response plans and capabilities, and employ adequate measures for cyanide management. 	<p>Standard of practice</p> <ul style="list-style-type: none"> Design and construct unloading, storage, and mixing facilities consistent with sound, accepted engineering practices, and quality control and quality assurance procedures. Spill prevention and spill containment measures. Operate unloading, storage, and mixing facilities using inspections, preventive maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures. 	<p>Standard of practice;</p> <ul style="list-style-type: none"> Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures. Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings. Implement a comprehensive water management program to protect against unintentional releases. Implement measures to protect birds, other wildlife, and livestock from adverse effects of cyanide process solutions. Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water. Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water. Provide spill prevention or containment measures for process tanks and pipelines. Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications. Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and ground water quality 	<p>Standard of practice;</p> <ul style="list-style-type: none"> Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, and livestock. Establish an assurance mechanism capable of fully funding cyanide-related decommissioning activities.

Table 2: Principles and standards of practice in Cyanide Management, Continued

Worker safety	Emergency response	Training	Dialogue
<ul style="list-style-type: none"> • Protect workers' health and safety from exposure to cyanide. • Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce, and control them. • Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures 	<ul style="list-style-type: none"> • Protect communities and the environment through the development of emergency response strategies and capabilities • Prepare detailed emergency response plans for potential cyanide releases. • Involve site personnel and stakeholders in the planning process • Designate appropriate personnel and commit necessary equipment and resources for emergency response plans for potential cyanide releases • Involve site personnel and stakeholders in the planning process. • Develop procedures for internal and external emergency notification and reporting. • Incorporate into response plans monitoring elements and remediation measures • That account for the additional hazards of using cyanide treatment chemicals. • Periodically evaluate response procedures and capabilities and revise them as needed 	<ul style="list-style-type: none"> • Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner. • Train workers to understand the hazards associated with cyanide use. • Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community, and the environment. • Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide 	<ul style="list-style-type: none"> • Engage in public consultation and disclosure • Provide stakeholders the opportunity to communicate issues of concern. • Initiate dialogue describing cyanide management procedures and responsively address identified concerns • Make appropriate available to stakeholders

5 ROLES AND RESPONSIBILITIES

The key roles and responsibilities in the implementation of this Management Plan are set out in Table 3.

Table 3: Roles and Responsibilities

Roles	Responsibilities
General Manager	<ul style="list-style-type: none"> Responsible for providing resources for the implementation of this management plan in compliance with the national and international regulations, company policies and standards.
Operations Manager	<ul style="list-style-type: none"> Business Managers are responsible for checking and publishing the compliance with the local and international regulations, company policies and standards, and implementing them in all departments of the operation and in coordination with stakeholders where necessary. Ensure the compliance of this management plan with the Project commitments and standards, Ensure that the plan is accessible to the employees and the sub-employer employees affiliated to TÜMAD, Ensure the efficiency of this management plan by inspecting all the business areas of TÜMAD and the business areas of the sub-employer with periodic inspections.
IMS & Sustainability Manager	<ul style="list-style-type: none"> Responsible for the preparation, revision, development and monitoring of this plan.
Head of OHS, Environment and Community Relations Departments	<ul style="list-style-type: none"> Ensure that all the activities of TÜMAD are carried out in accordance with this Management Plan and related procedures and instructions, Ensure the reporting of all the hazards, nonconformities and incidents, Ensure the planning, preparation and provision of the necessary trainings in order to enable the full and complete implementation of this plan by the sub-employer employees and the stakeholders.
Department Head of Community Relations	<ul style="list-style-type: none"> Ensure the implementation of this plan; for ensuring the coordination with official institutions and other stakeholders Ensure that the community complaints are recorded and monitored; for negotiating with the relevant bodies and ensuring the closure of the complaint within the periods specified for the closure of the complaints; for ensuring the communication and information transfer with the complaining community members.
Finance & Administrative Affairs Manager	<ul style="list-style-type: none"> The implementation of the security parts of this plan.
Security Manager	<ul style="list-style-type: none"> Have a key role in management of security related conflicts, risks related with communities.

6 MITIGATION MEASURES AND MANAGEMENT CONTROLS

The Strategy of TÜMAD is to implement management plans and mitigation measures to contribute the protection and improvement of the physical and mental health and property and security of its direct and contracted employees and the neighbouring communities that can be affected by TÜMAD's operations that are being implemented or to be implemented from prospecting to investment, construction, operating, shut down and rehabilitation processes.

The TÜMAD's liability and approach is;

- to avoid, minimize the negative impacts by identifying and assessing the potential negative risks related to the project in the abovementioned processes during the several phases of the projects,
- to protect the ecological balance, complying with the international occupational health and safety standards, using the best practicable technologies,
- To ensure the continuous improvement, development and sustainability during the realization of these strategies.

This document summarizes the commitment and approach of the TÜMAD to reduce the risks of community health, safety and security that may arise as a direct or indirect consequence of the implementation of programs that contribute to the protection of the health of the local population and of a healthy workforce in terms of community health and safety.

TÜMAD'S approach to management of risks associated with Cyanide use- this is the main concern of people is given in Table 1 and Table 2 above.

TÜMAD and the personnel of the security company as sub-employer will comply with the relevant community institution and organization officers and the Private Security Law No.5188, EBRD PR4 (23) and the instructions specified Voluntary Principles on Security and Human Rights.

TÜMAD commits to ensure that its security personnel are adequately trained and in appropriate behaviour against the local communities and act in accordance with the applicable law and in line with the Voluntary Principles on Security and Human Rights. TÜMAD has established a complaints mechanism for community members to allow them to express the concerns or complaints regarding the security disputes of the local communities and stakeholders.

This plan includes identifying and evaluating the potential negative risks associated with the projects in various phases of the projects. Social Impact Assessment studies have been conducted for both mines to identify potential negative risks associated with different stages of the project, including Community Health, Safety Assessment.

Stakeholder Engagement Plans for each Project should be referred for the list of the stakeholders.

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS	Document No	Rev.	Page
	TMD_EYS_PLN.006	0	13/30

Table 4: Key CHSS Risks and Management Controls for the Lapseki and İvrindi Project

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
Communicable and STD diseases	OHS measures and infectious diseases - It has adverse impacts If any measure is not taken, and it has positive impact if measures are taken	Construction	Lapseki Mine: Şahinli and Kocabaşlar and neighbouring settlements İvrindi Mine: Değirmenbaşı and Küçükılıca settlements	<ul style="list-style-type: none"> • OHS applications • Infirmary services • Employment of doctor and health technician in the infirmary • A patient transportation vehicle and driver • Health certificate from the Personnel to work • Periodical health screening of personnel • Regular trainings on infectious diseases • Health screening of employees and contractors before employment and regular health check-ups throughout employment period 	<ul style="list-style-type: none"> • Community Relations Policy • Human Resources Policy • Environmental Policy • Occupational Health and Safety Policy • OHS Environment and Community Relations and IMS Policy • Quality Policy • Supply Chain Policy • Stakeholder Engagement Plan • Explosives and Hazardous Materials Management Plan • Traffic Management Plan • Cyanide Management Plan • Emergency Action Plan • Local Procurement Management Plan • Labour Management Plan • Contractor Management Plan • Health and Safety Management Plan • Spill Clean Up Plan • Mine Closure Framework • Visual Impact Assessment Plan • Noise and Vibration Management Plan • Air Quality Management Plan • Waste Management Plan • Water Resources Management Plan • Mine Wastes Management Plan • Corrective Action Procedure • Engagement of Related Stakeholder Parties and Communication Procedure • Grievance and Feedback Procedure • Hydrogeology Report (Water Resources Impact Assessment) • Social Management Plan 	Workplace Doctor and Nurses Head of OHS, Environment Department	Review of records Grievance Procedure
		Operation	Lapseki Mine: Şahinli and Kocabaşlar and neighbouring settlements İvrindi Mine: Değirmenbaşı and Küçükılıca settlements	<ul style="list-style-type: none"> • Induction and refreshment trainings for awareness of workers on the prevention of STDs and other Communicable diseases • Identification of opportunities to support local health campaigns on prevention of STDs and Communicable diseases • There will be specific stakeholder/focus group meetings with vulnerable groups (including women) as per the Stakeholder Engagement Programme, information on Communicable and STD diseases will be a subject in these meetings. 		Workplace Doctor and Nurses Head of OHS, Environment Department	Review of records Grievance Procedure

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
					<ul style="list-style-type: none"> • Engagement of the Related Stakeholder Parties and Communication Procedure • Employment of the Local People and Commercial Support Procedure • TÜMAD Risk Evaluation Matrix 		
Cyanide use	Use of cyanide and concerns of the households - Cyanide use during the operation period, strong concerns of the households	Construction	<p>Lapseki Mine: Şahinli and Kocabaşlar and neighbouring settlements</p> <p>İvrindi Mine: Değirmenbaşı and Küçükılca settlements</p>	<ul style="list-style-type: none"> • Compliance with environmental standards accepted by EBRD • Ensuring compliance of environmental management system with the EBRD standards • Informative studies • Grievance mechanism • Improvement of the capacity of the Site Public Relations Unit • Employment of female specialist • Regular trips to the project plant • Community Advisory Board. • Cyanide Management Plan complying with ICMI Cyanide Code • Membership of ICMC 	<ul style="list-style-type: none"> • Community Relations Policy • Human Resources Policy • Environmental Policy • Occupational Health and Safety Policy • OHS Environment and Community Relations and IMS Policy • Quality Policy • Supply Chain Policy • Stakeholder Engagement Plan • Explosives and Hazardous Materials Management Plan • Traffic Management Plan • Cyanide Management Plan 	Head of OHS and Environment, Community Relations Department Finance and Administrative Affair Manager Procurement Expert	Cyanide Management Plan Document review Review of training records

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
		Operation	<p>Lapseki Mine: Şahinli and Kocabaşlar and neighbouring settlements</p> <p>İvrindi Mine: Değirmenbaşı and Küçükılca settlements</p>	<ul style="list-style-type: none"> • Keeping Emergency Action procedures up-to-date. • Commitment on sharing soil and water monitoring results with the local community members on a routine basis. • There will be specific stakeholder/focus group meetings with vulnerable groups (including women) as per the Stakeholder Engagement Programme, information on Cyanide use will be a subject in these meetings. • Measures given in Table 1 and 2 of this Plan. 	<ul style="list-style-type: none"> • Emergency Action Plan • Local Procurement Management Plan • Labour Management Plan • Contractor Management Plan • Health and Safety Management Plan • Spill Clean Up Plan • Mine Closure Framework • Visual Impact Assessment Plan • Noise and Vibration Management Plan • Air Quality Management Plan • Waste Management Plan • Water Resources Management Plan • Mine Wastes Management Plan • Corrective Action Procedure • Engagement of Related Stakeholder Parties and Communication Procedure • Grievance and Feedback Procedure • Hydrogeology Report (Water Resources Impact Assessment) • Social Management Plan • Engagement of the Related Stakeholder Parties and Communication Procedure • Employment of the Local People and Commercial Support Procedure • TÜMAD Risk Evaluation Matrix 	Head of OHS and Environment, Community Relations Department Finance and Administrative Affair Manager Procurement Expert	<p>Cyanide Management Plan</p> <p>Document review</p> <p>Review of training records</p>

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
Traffic	Traffic safety - accident risks	Construction	<p>Lapseki Mine: Şahinli and Kocabaşlar and neighbouring settlements</p> <p>İvrindi Mine: Değirmenbaşı and Küçükılca settlements</p>	<ul style="list-style-type: none"> • Traffic warning signs • Informative studies • Speed limit controls • Traffic, defensive driving techniques, and similar trainings for the employees • Video camera system installation in Şahinli village • Security cameras system in the project site • In case the transportation routes are close to the villages, the information on the routes and transportation schedule will be communicated to the community members. • Installation of GPS at vehicles. • Installation of all necessary road signage at the public roads to be used for transportation through consultation with the relevant authorities. • Establishment and implementation of a training programme on traffic and transportation hazards for all employees and contractor employees who is managing the traffic at site and transportation to site. • Definition and placement of all necessary warning signs at the mine site. • Preparation and delivery of driving trainings for all operators and drivers on advanced, heavy vehicle and defensive driving. These trainings will be mandatory for all TÜMAD and contractor drivers. The chemical suppliers will provide evidence on the delivery of such trainings to their drivers. • Development and implementation of Road Safety Awareness Programme for the local community. • For Lapseki, education in Şahinli and Kocabaşlar is provided as transported education. Therefore no specific training can be delivered to children at schools targeted for the affected 	<ul style="list-style-type: none"> • Community Relations Policy • Human Resources Policy • Environmental Policy • Occupational Health and Safety Policy • OHS Environment and Community Relations and IMS Policy • Quality Policy • Supply Chain Policy • Stakeholder Engagement Plan • Explosives and Hazardous Materials Management Plan • Traffic Management Plan • Cyanide Management Plan • Emergency Action Plan • Local Procurement Management Plan • Labour Management Plan • Contractor Management Plan • Health and Safety Management Plan • Spill Clean Up Plan • Mine Closure Framework • Visual Impact Assessment Plan • Noise and Vibration Management Plan • Air Quality Management Plan • Waste Management Plan • Water Resources Management Plan • Mine Wastes Management Plan • Corrective Action Procedure • Engagement of Related Stakeholder Parties and Communication Procedure • Grievance and Feedback Procedure • Hydrogeology Report (Water Resources Impact Assessment) • Social Management Plan 	Investment and Construction Manager) IMS & Sustainability Manager Head of OHS and Environment, Community Relations Department	Review of records Grievance Procedure

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
		Operation	<p>Lapseki Mine: Şahinli and Kocabaşlar and neighbouring settlements</p> <p>İvrindi Mine: Değirmenbaşı and Küçükılca settlements</p> <p>Lapseki Mine: Şahinli and Kocabaşlar and neighbouring settlements</p> <p>İvrindi Mine: Değirmenbaşı and Küçükılca settlements</p>	<p>community. There will be specific stakeholder/focus group meetings with vulnerable groups (including women) as per the Stakeholder Engagement Programme, information on Traffic Safety will be a subject in these meetings.</p> <ul style="list-style-type: none"> • For İvrindi, there is a primary school in Değirmenbaşı village and secondary school in Korucu neighbourhood. There will be training on traffic safety for children at Değirmenbaşı primary school and Korucu secondary school. There will be specific stakeholder/focus group meetings with vulnerable groups (including women) as per the Stakeholder Engagement Programme, information on Traffic Safety will be a subject in these meetings. • Recording daily the delivery of materials and access of vehicles to site. • Visual signs at the machinery operating at the construction and operation sites. • Requirement on the development of Emergency Action Plan by the contractors for the off-site emergencies in line with TÜMAD Emergency Action Plan and Contractor Management Plan • Maintenance and verification inspection of the vehicles in line with manufacturers' and national legislation requirements. • Prohibition of use of alcohol and illegal drugs. Regular checks on drivers will be carried out as per Alcohol and Drug Detection Procedure (TMD_ISG_PRD.004). 	<ul style="list-style-type: none"> • Engagement of the Related Stakeholder Parties and Communication Procedure • Employment of the Local People and Commercial Support Procedure • TÜMAD Risk Evaluation Matrix 	<p>Investment and Construction Manager)</p> <p>Mine Operations Manager</p> <p>IMS & Sustainability Manager</p> <p>Head of OHS and Environment, Community Relations Department</p>	<p>Review of records</p> <p>Grievance Procedure</p>
Water Resources	Contamination and / or reduction of water resources - Possibility of reduction, contamination in underground and surface waters due to operational activities	Construction	<p>Lapseki Mine: Şahinli and Kocabaşlar settlements</p> <p>İvrindi Mine: Değirmenbaşı settlement</p>	<ul style="list-style-type: none"> • Compliance with environmental standards accepted by EBRD • Ensuring compliance of environmental management system with the EBRD standards • Drainage Channels • Settling Basins • Flood Basins • Interception Channels 	<ul style="list-style-type: none"> • Community Relations Policy • Human Resources Policy • Environmental Policy • Occupational Health and Safety Policy • OHS Environment and Community Relations and IMS Policy 	<p>Head of Environment, Community Relations Department</p>	<p>Review of records</p> <p>Grievance Procedure</p>

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
		Operation	<p>Lapseki Mine: Şahinli and Kocabaşlar settlements</p> <p>İvrindi Mine: Değirmenbaşı settlement</p>	<ul style="list-style-type: none"> • Water quality monitoring program • Sample analyses • Grievance mechanism • There will be specific stakeholder/focus group meetings with vulnerable groups (including women) as per the Stakeholder Engagement Programme, information on water resources mitigation measures/water quality monitoring programme will be a subject in these meetings. • A separate water pipeline is built to bring water from Lapseki Municipality and avoid use of local water resources for the mine. 	<ul style="list-style-type: none"> • Quality Policy • Supply Chain Policy • Stakeholder Engagement Plan • Explosives and Hazardous Materials Management Plan • Traffic Management Plan • Cyanide Management Plan • Emergency Action Plan • Local Procurement Management Plan • Labour Management Plan • Contractor Management Plan • Health and Safety Management Plan • Spill Clean Up Plan • Mine Closure Framework • Visual Impact Assessment Plan • Noise and Vibration Management Plan • Air Quality Management Plan • Waste Management Plan • Water Resources Management Plan • Mine Wastes Management Plan • Corrective Action Procedure • Engagement of Related Stakeholder Parties and Communication Procedure • Grievance and Feedback Procedure • Hydrogeology Report (Water Resources Impact Assessment) • Social Management Plan • Engagement of the Related Stakeholder Parties and Communication Procedure • Employment of the Local People and Commercial Support Procedure • TÜMAD Risk Evaluation Matrix 	Mine Operations Manager Head of Environment, Community Relations Department	Review of records Grievance Procedure

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
Dust and air quality	Dust and air quality - Grievances related to dusts to be generated due to operation activities.	Construction	Lapseki Mine: Şahinli and Kocabaşlar İvrindi Mine: Değirmenbaşı and Küçükilıca	<ul style="list-style-type: none"> • Compliance with environmental standards accepted by EBRD • Ensuring compliance of environmental management system with the EBRD standards • Dust measurements • Heavy metal measurements in particulate matters • Discharge and filling will be carried out without throwing around 	<ul style="list-style-type: none"> • Community Relations Policy • Human Resources Policy • Environmental Policy • Occupational Health and Safety Policy • OHS Environment and Community Relations and IMS Policy • Quality Policy • Supply Chain Policy • Stakeholder Engagement Plan • Explosives and Hazardous Materials Management Plan • Traffic Management Plan • Cyanide Management Plan • Emergency Action Plan • Local Procurement Management Plan • Labour Management Plan • Contractor Management Plan • Health and Safety Management Plan • Spill Clean Up Plan • Mine Closure Framework • Visual Impact Assessment Plan • Noise and Vibration Management Plan • Air Quality Management Plan • Waste Management Plan • Water Resources Management Plan • Mine Wastes Management Plan • Corrective Action Procedure • Engagement of Related Stakeholder Parties and Communication Procedure • Grievance and Feedback Procedure • Hydrogeology Report (Water Resources Impact Assessment) • Social Management Plan • Engagement of the Related Stakeholder Parties and Communication Procedure 	Head of Environment, Community Relations Department	Review of records Grievance Procedure
		Operation	Lapseki Mine: Şahinli and Kocabaşlar İvrindi Mine: Değirmenbaşı and Küçükilıca	<ul style="list-style-type: none"> • Covering the top of the connection parts of the conveyors and other carriers • Appropriate blasting design • Watering or spraying on earth roads • Speed limit on the roads within the mine • Keeping the transported material moist. • Covering the tops of the trucks with canvas • Organic based soil stabilizer • Closed crushed ore storage area • Reducing slope in heap storage areas • Keeping top layers in the storage area with 10% moisture • Wind breaking plates in the field, if necessary • Replanting works • There will be specific stakeholder/focus group meetings with vulnerable groups (including women) as per the Stakeholder Engagement Programme, information on dust mitigation measures/dust and heavy metal monitoring/livelihood impacts will be a subject in these meetings. 		Mine Operations Manager Head of Environment, Community Relations Department	Review of records Grievance Procedure

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
					<ul style="list-style-type: none"> • Employment of the Local People and Commercial Support Procedure • TÜMAD Risk Evaluation Matrix 		
Noise	Noise - Grievances related to the noises that will occur due to operation activities	Construction	Lapseki Mine: Şahinli and Kocabaşlar settlements İvrindi Mine: Değirmenbaşı and Küçükılca settlements	<ul style="list-style-type: none"> • Compliance with environmental standards accepted by EBRD • Ensuring compliance of environmental management system with the EBRD standards • Measurements of the stationary and mobile measurement stations • Regular maintenance of the machinery and equipment to be used • Seed control within the site • Reducing the number of vehicles that will operate, if necessary • Grievance mechanism • There will be specific stakeholder/focus group meetings with vulnerable groups (including women) as per the Stakeholder Engagement Programme, information on noise mitigation measures/noise quality monitoring programme will be a subject in these meetings. 	<ul style="list-style-type: none"> • Community Relations Policy • Human Resources Policy • Environmental Policy • Occupational Health and Safety Policy • OHS Environment and Community Relations and IMS Policy • Quality Policy • Supply Chain Policy • Stakeholder Engagement Plan • Explosives and Hazardous Materials Management Plan • Traffic Management Plan • Cyanide Management Plan • Emergency Action Plan • Local Procurement Management Plan • Labour Management Plan • Contractor Management Plan • Health and Safety Management Plan • Spill Clean Up Plan • Mine Closure Framework • Visual Impact Assessment Plan • Noise and Vibration Management Plan 	Head of Environment, Community Relations Department	Review of records Grievance Procedure
		Operation	Lapseki Mine: Şahinli and Kocabaşlar settlements İvrindi Mine: Değirmenbaşı and Küçükılca settlements			Mine Operations Manager Head of Environment, Community Relations Department	Review of records Grievance Procedure

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
					<ul style="list-style-type: none"> • Air Quality Management Plan • Waste Management Plan • Water Resources Management Plan • Mine Wastes Management Plan • Corrective Action Procedure • Engagement of Related Stakeholder Parties and Communication Procedure • Grievance and Feedback Procedure • Hydrogeology Report (Water Resources Impact Assessment) • Social Management Plan • Engagement of the Related Stakeholder Parties and Communication Procedure • Employment of the Local People and Commercial Support Procedure • TÜMAD Risk Evaluation Matrix 		

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
Vibration	Vibration (blasting) - Households may be disturbed by the blasting activities and their concerns about damaging of their houses and lands may increase.	Construction	<p>Lapseki Mine: Şahinli and Kocabaşlar settlements</p> <p>İvrindi Mine: Değirmenbaşı and Küçükılıca settlements</p>	<ul style="list-style-type: none"> • Compliance with environmental standards accepted by EBRD • Ensuring compliance of environmental management system with the EBRD standards • Blasting between 08:00 and 18:00 hours • Not performing blasting at night and on holidays • Blasting by specialist persons • Blasting announcements, information • Grievance mechanism • There will be specific stakeholder/focus group meetings with vulnerable groups (including women) as per the Stakeholder Engagement Programme, information on vibration mitigation measures/vibration monitoring at the settlements closest to the blasting points will be a subject in these meetings. 	<ul style="list-style-type: none"> • Community Relations Policy • Human Resources Policy • Environmental Policy • Occupational Health and Safety Policy • OHS Environment and Community Relations and IMS Policy • Quality Policy • Supply Chain Policy • Stakeholder Engagement Plan • Explosives and Hazardous Materials Management Plan • Traffic Management Plan • Cyanide Management Plan • Emergency Action Plan • Local Procurement Management Plan • Labour Management Plan • Contractor Management Plan • Health and Safety Management Plan • Spill Clean Up Plan • Mine Closure Framework • Visual Impact Assessment Plan • Noise and Vibration Management Plan • Air Quality Management Plan • Waste Management Plan • Water Resources Management Plan • Mine Wastes Management Plan • Corrective Action Procedure • Engagement of Related Stakeholder Parties and Communication Procedure • Grievance and Feedback Procedure • Hydrogeology Report (Water Resources Impact Assessment) • Social Management Plan 	Head of Environment, Community Relations Department	Review of records Grievance Procedure

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
		Operation	Lapseki Mine: Şahinli and Kocabaşlar settlements İvrindi Mine: Değirmenbaşı and Küçükılca settlements		<ul style="list-style-type: none"> Engagement of the Related Stakeholder Parties and Communication Procedure Employment of the Local People and Commercial Support Procedure TÜMAD Risk Evaluation Matrix 	Mine Operations Manager Head of Environment, Community Relations Department	Review of records Grievance Procedure
Security personnel	Social Dispute	Construction	Lapseki Mine: Şahinli and Kocabaşlar and neighbouring settlements İvrindi Mine: Değirmenbaşı and Küçükılca settlements	<ul style="list-style-type: none"> Employment of security personnel from the locals in the operational period Training programs for security personnel will be organized. These training programs include behavioural rules, conflict management, etc. Appropriate qualification and assignment of licensed security contractor. TÜMAD will require international certifications (eg. International Code of Ethics for Private Security Providers, such as ICoC). 	<ul style="list-style-type: none"> Community Relations Policy Human Resources Policy Environmental Policy Occupational Health and Safety Policy OHS Environment and Community Relations and IMS Policy Quality Policy Supply Chain Policy Stakeholder Engagement Plan 	Head of OHS, Environment, Community Relations Department OHS Unit Community Relations Unit Administrative Affairs	Review of records Grievance Procedure

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

CHSS Risks	Impacts	Phase	Affected Settlements	Measures	Management Plan and Procedures	Responsibility	Means of Verification
		Operation	<p>Lapseki Mine: Şahinli and Kocabaşlar and neighbouring settlements</p> <p>İvrindi Mine: Değirmenbaşı and Küçükılca settlements</p>	<ul style="list-style-type: none"> • Review the security personnel's criminal record, the potential for violence and the security risks • Firearms will not be allowed in the EIA Permit Area except for the explosive substances warehouse • Trainings on special codes of conduct for security personnel defined by appropriate conduct, conflict management and appropriate use of force and the implementation of voluntary codes of conduct for safety and human rights. • Implementation of grievance mechanism • Installation of security cameras at site 	<ul style="list-style-type: none"> • Explosives and Hazardous Materials Management Plan • Traffic Management Plan • Cyanide Management Plan • Emergency Action Plan • Local Procurement Management Plan • Labour Management Plan • Contractor Management Plan • Health and Safety Management Plan • Spill Clean Up Plan • Mine Closure Framework • Visual Impact Assessment Plan • Noise and Vibration Management Plan • Security Management Plan • Air Quality Management Plan • Waste Management Plan • Water Resources Management Plan • Mine Wastes Management Plan • Corrective Action Procedure • Engagement of Related Stakeholder Parties and Communication Procedure • Grievance and Feedback Procedure • Hydrogeology Report (Water Resources Impact Assessment) • Social Management Plan • Engagement of the Related Stakeholder Parties and Communication Procedure • Employment of the Local People and Commercial Support Procedure • TÜMAD Risk Evaluation Matrix 	<p>Head of OHS, Environment, Community Relations Department</p> <p>OHS Unit</p> <p>Community Relations Unit</p> <p>Administrative Affairs</p>	<p>Review of records</p> <p>Grievance Procedure</p>

7 MONITORING

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 Corrective Action Procedure TMD_EYS_PRD.002.

Table 5 and Table 6 below summarizes the key performance indicators and associated key monitoring actions that will be used to assess the progress and effectiveness of proposed mitigation strategies described above.

7.1 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.

Table 5: Key Monitoring Activities

No	Topic	Monitoring Activity	Periodicity	Location
CHSS-01	Communicable diseases	<ul style="list-style-type: none"> The changes in the trend of the health statistical data. Number of health training sessions run with local community. 	Annual	Mine affected neighbourhoods
CHSS-02	Cyanide use	<ul style="list-style-type: none"> Number of grievances regarding cyanide use. 	Continuous	Mine affected neighbourhoods
CHSS-03	Traffic	<ul style="list-style-type: none"> Number of grievances regarding traffic Number of recorded traffic incidents involving community members Number of drivers and community members involved in road safety training sessions. 	Continuous	Mine affected neighbourhoods
CHSS-04	Water Resources	<ul style="list-style-type: none"> Number of grievances regarding water supply. 	Continuous	Mine affected neighbourhoods
CHSS-05	Dust and air quality	<ul style="list-style-type: none"> Number of grievances regarding dust and air quality. 	Continuous	Mine affected neighbourhoods
CHSS-06	Noise	<ul style="list-style-type: none"> Number of grievances regarding noise. 	Continuous	Mine affected neighbourhoods
CHSS-07	Vibration	<ul style="list-style-type: none"> Number of grievances regarding vibration 	Continuous	Mine affected neighbourhoods
CHSS-08	Security personnel	<ul style="list-style-type: none"> Number of recorded security incidents involving TÜMAD workers and members of the local population. Number of grievances regarding security personnel. 	Continuous	Mine affected neighbourhoods
CHSS-09	Non-conformances about community health, safety & security measures given in Table 4	<ul style="list-style-type: none"> Number of non-conformances about community health, safety & security measures given in Table4, inspection reports, site observations. 	Continuous	Mine affected neighbourhoods

7.2 Key Performance Indicators

The table below summarises the key performance indicators and targets that will be used to assess the progress and effectiveness of proposed mitigation strategies.

Table 6: Key Performance Indicators

No	KPI	Target	Monitoring measure
CHSS-KPI-01	Total number of non-compliances with community health safety & security measures identified in <i>Table 4</i> of this Plan.	Minimise and target zero per annum.	Non-compliance reports
CHSS-KPI-02	Number of communicable and non-communicable diseases and injuries.	No significant increase in communicable and non-communicable disease and injury rates per 1,000 residents per annum.	Health statistics
CHSS-KPI-03	Number of community health safety & security complaints from local communities as recorded in the grievance management system.	Minimise and continued improvement in number of community health safety and security related complaints.	Number of grievances
CHSS-KPI-04	Number of reported community health & safety incidents	Minimise and target zero per annum.	Incident/Accident records

8 TRAINING

Department Head of Community Relations will undergo following trainings:

- TÜMAD mission, vision, strategy, values and objectives
- Organizational structure, working environment, policies and IMS awareness and requirement
- Occupational Health and Safety and Environment Trainings
- Development of managerial technical competence and skills to manage the effectiveness and efficiency of company processes
- Leadership, coaching leadership (mentoring), understanding communication styles, managing conflicts, motivation for effective organization of people, effective presentation techniques
- Developing problem solving and decision making skills
- Trainings on introduction to the communication channels of the company, developing the feedback techniques and managing the performance of the employees
- Implementation of the TÜMAD Complaint Mechanism

The security personnel will be subjected to following trainings:

- Information on Occupational Health and Safety policy, plan, procedure, instruction and site implementation rules for healthy working conditions and security
- Introduction to working environment, policies and practices, introduction to organization structure and company mission, vision, values and objectives
- TÜMAD Madencilik mission, vision, strategy, values and objectives
- All private security personnel will receive training on communication with local people, crowd management, conflict management and problem solving, cautious performance of security operations and appropriate force use and human rights.

Trainings to be provided to the employees:

- Trainings for all employees and sub-employers will include community health and safety issues.

Trainings to be provided to the community members:

- How to make complaints
- Road safety awareness training

- Health awareness training

9 AUDIT

Daily inspections such as wide range of operational OHS site inspections, work area inspections, including community health safety and security issues will be carried out by expert inspectors in accordance with the activities outside the mine area.

The incidents detected in these examinations will be reported as specified in the TÜMAD Accident Incident Loss Reporting Form (TMD_EYS_FRM.003).

Monitoring will be carried out by means of the annual, six-month and monthly internal inspection programs in accordance with the existing Inspection Program based on the Existing Management System of TÜMAD. This system will be used to assess the wide range compliance to the requirements of the Environment management system.

All incidents and non-conformities identified in these reviews are reported according to the requirements of TÜMAD Management System.

The documents to be particularly reviewed in the inspections to be carried out:

- Health statistics
- Incident/accident records
- Complaint records
- Training records

10 REPORTING

All incidents and non-conformities detected in inspections and examinations are reported in accordance with the inspection program in monthly, 6-month and annual basis in accordance with the requirements of TÜMAD Madencilik Management System (Internal Inspection Procedure) (TMD_KAL_PRD.001).

APPENDIX 1 – TÜMAD POLICIES

HEALTH AND SAFETY POLICY

TÜMAD Mining Inc. is a Turkish mining company which carries out exploration and development projects on precious and base metals with owned mineral exploration licenses. Its strategy is to create economically efficient large mine production sites in areas having potential. The goal is to create large-scale mine productions sites where economic and social development is united with environmental protection.

Our strategy is to create economically efficient large mine production sites in areas having potential without depriving our quality while overseeing nature and environment and respecting humans.

Our goal is to protect and improve our workers' physical and mental health; to serve their training, safety and productivity, to ensure their working environment; following all legislations and international health and safety standards and watching the rapidly changing and developing technologies in mining practices, we are running.

To achieve our goals regarding Health and Safety Policy, we commit to accord to all the requirements written below;

- Protecting ecology and minimizing the negative effects in the course of our operations; securing health, life and wealth of our workers and other people who might be affected by our activities.
- Aiming zero injury rate; continually enhancing and developing systematic and proactive working conditions; providing necessary sources and all H&S equipment in convenient order.
- Constituting, applying, controlling, developing and sustaining H&S management system together with the Risk Management process which aims to create opportunities through defining, analyzing, evaluating and taking precautions for all our partners(workers, shareholders, contractors, sub-contractors and our society including national and international workers).
- Uniting all H&S subjects under the roof of our company in the circumstances including research, project developments, mining generalization, procurements, deprivation of rights and closure.
- In the directions of our society's expectations; sustaining our H&S operations by applying legislations and standards and targeting continual developments and enhancements .
- Designing and running all the operations and depending infrastructure to serve a safe working environment and to prevent injuries.
- Providing the trainings to make all our partners work safely, responsibly and accordingly to the policies.
- Starting, running and controlling regular audit and evaluation programs; increasing efficiency through taking advices for enhancements
- Consulting thoughts and views of society and the workers about H&S values, wants and attention at the phases of development, activities and closure. Sharing these acquired knowledge, experience and updates with our partners.
- Establishing open relations to make all our workers adopt H&S awareness and using all necessary trainings to achieve the former. Through this, we aim to take effective precautions and decisions.
- Committing to H&S performance reports. Improving and reaching sustainability through benefiting obtained reports.
- Ensuring all the operations to compose great sustainability level; revising H&S policies, aims and goals.

Hasan Yücel
General Manager

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS	Document No	Rev.	Page
	TMD_EYS_PLN.006	0	29/30

COMMUNITY RELATIONS POLICY

TÜMAD Mining Incorporation is a Turkish mining company which carries out researches and projects on valuable and base metals having mine searching licenses. Its strategy is to create economically efficient large mine production sites in areas having potential. The goal is to create large scale mine productions sites where economic and social development is united with environmental protection. In this context; its aim is to perform trade, operations and production compatible with national and international law norms in terms of time, amount, place and quality; ensuring most favourable prices.

We are applying these subjects considering below;

- A production system where social approval exists
- Bringing forward solutions based on respect, reciprocal reliability and dialogue in the company and with the local society
- Respecting needs and wants of every member of the society we are working with
- Running our operations while benefiting society we are working with
- Win&win and maximum benefit principle
- Being responsible members of societies we are working with
- Respecting values, views and rights of individuals

We are going to work for constituting relations based on subjects below;

- Open, effective, fair and transparent relations
- To learn from each other
- Reciprocal solidarity and dialogue
- Sharing the success

This policy is going to be run respective to H&S, Environment and Quality Policies of TÜMAD Mining Incorporation

Hasan YÜCEL
General Manager

COMMUNITY HEALTH & SAFETY SECURITY MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS	Document No	Rev.	Page
	TMD_EYS_PLN.006	0	30/30