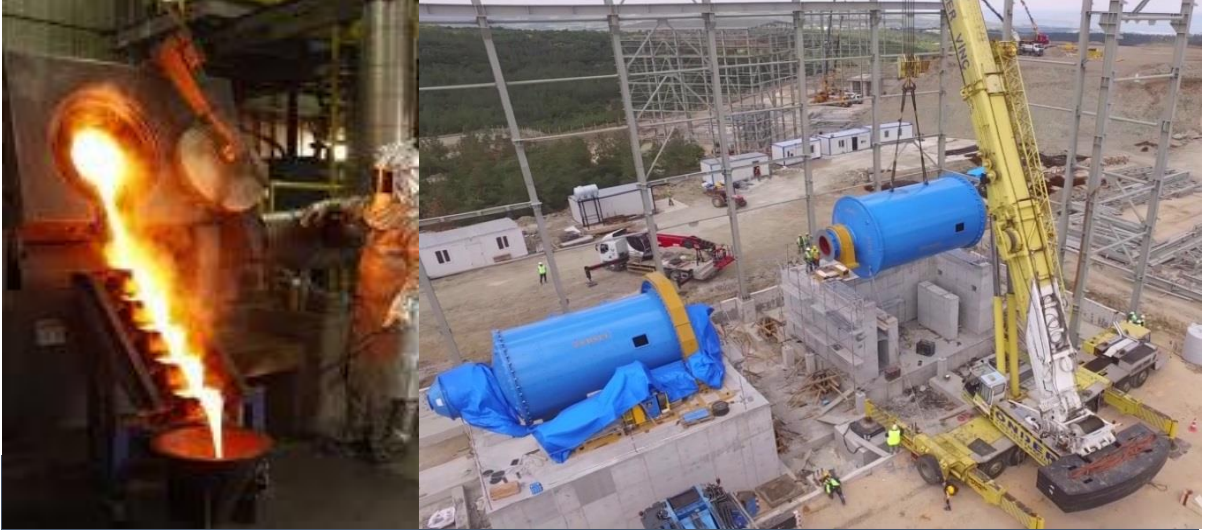


TÜMAD

MADENCİLİK SANAYİ VE TİCARET A.Ş.



TRAFFIC MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

by TÜMAD Madencilik San. ve Tic. A.Ş.

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TRAFFIC MANAGEMENT PLAN for LAPSEKİ & İVRİNDİ PROJECTS

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REVISION HISTORY

Paragraph	Revision	Explanation	Date
-	0	First Issue	

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APPENDICES

APPENDIX 1 – TRAFFIC RISK ASSESSMENT MATRIX

APPENDIX 2 – LAPSEKİ PROJECT SHUTTLE ROUTES AND FREQUENCIES

ABBREVIATIONS AND DEFINITIONS

Project(s)	: Lapseki and İvrindi Gold and Silver Mine and Processing Projects
TÜMAD	: TÜMAD Madencilik San. ve Tic. A.Ş.
EBRD	: European Bank for Reconstruction and Development
EIA	: Environmental Impact Assessment
ESMS	: Environmental and Social Management System
EU	: European Union
HR	: Human Resources
HSMP	: Health Safety Management Plan
ICMI	: International Cyanide Management Code
IMS	: Integrated Management System
KPI	: Key Performance Indicator
MoEU	: Ministry of Environment and Urbanization
OHS	: Occupational Health and Safety
PR(s)	: Performance Requirement(s)

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 Küçükılıca Villages of the İvrindi District of Province of Balıkesir. The İvrindi Project has 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).

The Project(s) are 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.

This Document is the Traffic Management Plan that is prepared for TÜMAD Operations at Lapseki and İvrindi Mines. The Integrated Management System document registration number for Traffic Management Plan is TMD_İSG_PLN.005. 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 Framework (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.010).

2 PURPOSE

The Traffic Management Plan defines;

- procedures and protocols for site access, traffic routing and management, and company policy with respect to vehicle, equipment, supplies, employee and visitor transportation and movement during the TÜMAD Lapseki operation phase and İvrindi Silver & Gold construction and operation phase.
- the management controls of project traffic within communities, so that potential negative impact is minimized and mitigated.
- strategies for minimizing and managing traffic generated by the Projects.
- Project Standards for the management of traffic
- the roles and responsibilities and interphases for the implementation of this management plan
- monitoring and training requirements and Key Performance Indicators

3 SCOPE

This plan embraces all activities of those including TÜMAD Mining and all Contractors. All Contractors shall be in compliance with related requirements, standards and these plans as explained in the Contractor Management Plan (TMD_İSG_PLN.003).

This plan does not provide the details of mitigation measures for the safe transport of cyanide. The cyanide management plan (TMD_CEV_PLN.008) is prepared for this purpose.

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3.1 Overlaps with Other Management Plans

This Management Plan has overlaps and cross-linkages to a number of other Management Plans which have Traffic Management Plan, including:

- The Community Health, Safety and Security Management Plan (TMD_EYS_PLN.006), particularly in relation to off-site transportation risks on local communities.
- Framework Biodiversity Action Plans, particularly in relation to location of activities or plant and equipment relative to identified sensitive receptors.
- Cyanide Management Plan (TMD_CEV_PLN.008), particularly in relation to the management of delivery and transportation risks of cyanide to the mine sites.
- Explosive and Hazardous Materials Management Plan (TMD_ISG_PLN.006), particularly in relation to the management of transportation risks of explosives and hazardous materials, protection of employees and local communities and environment from exposure to hazardous materials and incidents.
- Noise & Vibration Management Plan (TMD_CEV_PLN.002), particularly in relation to management of off-site exposure to noise generated by vehicles.
- Health and Safety Management Plan (TMD_ISG_PLN.007), particularly in relation to exposure to on-site transportation risks.
- Emergency Action Plan (TMD_ISG_PLN.002), particularly in relation to the on-site and off-site transportation emergencies and response actions.
- Contractor Management Plan (TMD_ISG_PLN.003), particularly in relation to the management of contractors related to traffic management.

4 PROJECT STANDARDS

Project Standards are defined by;

- National Legislation;
- Turkish Environmental Impact Assessment (EIA) requirements;
- other commitments to and requirements of Turkish Government authorities;
- applicable international standards and guidelines;
- applicable TÜMAD standards, policies and procedures;
- other industry guidelines with which TÜMAD has committed to comply.

4.1 Applicable Turkish National Standards

- Turkish Road Traffic Law No. 2918.
- Notice on prevention of Pollution Caused by Exhaust Gases of Motor Vehicles (Official Gazette 22/10/1992 and #21383).
- Regulation on the Transportation of Dangerous Materials by Road (Official Gazette of 24.10.2013; No: 28801).
- Law No. 6331 on Occupational Health and Safety

4.2 Turkish EIA requirements.

4.2.1 National EIA Commitments for Lapseki Project

- For the transportation of the materials, the provisions of the Highway Traffic Law (Official Gazette No. 18195, 18.10.1983) and Highway Traffic Regulation (Official Gazette No. 23053, 18.07.1997) will be followed.
- Speed limit will be set in the project area and the vehicles will be made to comply with the speed limit.

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- On-site roads will be wide enough for cars to pass.
- It will be ensured that on-site roads are undamaged and safe.
- All vehicles will be regularly serviced and maintained.
- It will be ensured that all project personnel comply with the Emergency Action Plan.
- On-site roads will be regularly moisturized especially during the summer months, therefore the accident risk due to extreme dust can be minimized.
- On-site roads will be maintained and levelled continuously.
- Necessary training will be delivered to the Project staff.

4.3 Applicable International Standards and Guidelines

EBRD Performance Requirement 4: Health and Safety setting following requirements related to traffic and road safety as;

- The client will evaluate and monitor the potential traffic and road safety risks to workers and potentially affected communities throughout the project life cycle and develop measures and plans to address them.
- For projects that operate moving equipment on public roads and other forms of infrastructure, the client will seek to prevent the occurrence of incidents and injuries to members of the public associated with the operation of such equipment.
- Consideration should be given to relevant EU road and safety measures. Consistent with the objectives of Directive 2008/96/EC of 19 November 2008 on Road Infrastructure Safety Management.
- Technically and economically feasible and cost effective road safety components will be incorporated in project design to mitigate potential road safety impacts on locally affected communities.
- Where appropriate, a road safety audit will be undertaken for each phase of the project and routinely monitor incident and accident reports to identify and resolve problems or negative safety trends.
- For projects which utilize vehicles or fleets of vehicles (owned or leased), the client will appropriate training to workers on driver and vehicle safety. The client will ensure regular maintenance of all project vehicles.

4.4 Applicable TÜMAD Standards, Policies and Procedures

List of applicable TÜMAD standards, policies and procedures are given in Section 2.1. Additionally following documents have been prepared to support the implementation of this Plan.

- | | |
|--|-------------------|
| • Risk Management Procedure | (TMD_ISG_PRD.003) |
| • Weekly vehicle maintenance form | (TMD_IDR_FRM.002) |
| • Daily vehicle maintenance form | (TMD_IDR_FRM.004) |
| • Vehicle Driving Procedure | (TMD_IDR_PRD.001) |
| • Field Driving Rules Procedures & Delegation Procedures | (TMD_ISG_PRD.015) |
| • Field Driving Rules Procedures | (TMD_ISG_PRD.016) |
| • General Field Driver's License Evaluation Form | (TMD_ISG_FRM.035) |
| • Alcohol and Drug Addiction Procedure | (TMD_ISG_PRD.004) |
| • Alcohol Control Instruction | (TMD_GUV_TLM.002) |

TÜMAD will obtain the following international certificates to manage the OHS risks in construction and operations of the mines:

- | | |
|--------------------|--|
| • ISO 9001:2015 | “Quality Management System Requirements” |
| • ISO 14001:2015 | “Environmental Management System Requirements” |
| • OHSAS 18001:2007 | “Occupational Health and Safety Management System” |

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4.5 Other industry guidelines with which TÜMAD has committed to comply

TÜMAD will protect communities and the environment during cyanide transport. Standard of practice TÜMAD will establish clear lines of responsibility for safety, security, release prevention, training, and emergency response in written agreements with producers, distributors, and transporters (ICMC) as defined in Cyanide Management Plan (TMD_CEV_PLN.008).

5 ROLES AND RESPONSIBILITIES

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

Table 1: Roles and Responsibilities

Roles	Responsibility
General Manager	<ul style="list-style-type: none"> Owner and approver of this Plan. Provide resources for the implementation of this Plan. Provide equipment, devices and training necessary for road safety and rescue teams from accidents
Project Manager (Construction) Operations Manager	<ul style="list-style-type: none"> Ensure that relevant activities are undertaken in accordance with this Management Plan and related Procedures. Ensure that department personnel are fully trained in transportation management practices. Presiding over the exercise scenarios specified in the traffic management plan, ensuring that the necessary facilities are provided, evaluating the results of the exercise. Ensure incident investigations are undertaken and reported
Head of Occupational Health and Safety	<ul style="list-style-type: none"> Ensure Project compliance with the Project Standards and other requirements set out in this Plan. Responsible for ownership and overall implementation of this plan and ensuring Contractors implement applicable elements of this Plan. Provide technical support to TÜMAD Departmental Managers and Contractors to ensure compliance with the Traffic Management Plan. Ensure Plan is available to all TÜMAD employees and Contractors. Undertake periodic road safety/traffic risk assessments, audits and inspections of TÜMAD Department and Contractor workplaces against the requirements of this Management Plan and related Procedures. To prepare, offer emergency exercise scenarios, implement Emergency Exercise, provide trainings, follow the training and performance of Mine Rescue and Recovery teams and make suggestions Report all hazards, non-conformances and incidents.

Roles	Responsibility
Head of Community Relations	<ul style="list-style-type: none"> Engagement with local stakeholders related to off-site transportation. Management of grievance procedure. Traffic safety trainings to local villagers/ school children living in traffic affected communities.
Contractors and all staff (for operations and construction)	<ul style="list-style-type: none"> Attend relevant training. Implement and follow the control measures listed in this Plan. Report unconformities, accidents/incidents immediately.

6 PROJECT DESCRIPTION

6.1 Lapseki Project

TÜMAD plans to establish the Lapseki Gold and Silver Mine and Processing Project (the Lapseki Project, or the Project) within the administrative boundaries of the Şahinli and Kocabaşlar Villages of the Lapseki District in the Province of Çanakkale. Within the scope of the Project, gold and silver minerals will be obtained from 4 pits (namely the Karakovan, Karatepe, K-Zone and SBX Pits) which will be extracted via explosive pit mining methods. The produced ore will be subjected to enrichment by tank leaching and ore will be obtained as a final product.

An Environmental Impact Assessment (EIA) Report was prepared for the Lapseki Project, pursuant to the “Environmental Impact Assessment Regulation” under the environmental legislation of Turkey which was approved by the Ministry of Environment and Urban Planning as indicated in the “EIA Positive Decision” approval letter dated August 14, 2015 and gold production will be begin on 4th quarter of 2017.

The air distance of the activity area of the Lapseki Project to the Çanakkale province centre is 34.7 km and to the Lapseki district centre is 7.3 km. Access to the project area is provided by following the Bursa-Çanakkale Highway no. E-90 to reach the Lapseki district centre and then by following the Şahinli village road. Site Location Map of the Project is given in Figure 1.

Karakovan ve Karatepe Pits are located at Kovanlık Hill, K-zone Pits at Kestanelik Ridge, SBX Pit is located at Meydan Hill. The waste disposal area will be on Karagürgen Ridge, the mineral processing plant area will be on the Topyurt hill and ore side of Şahinli village road. There also be administrative social buildings, land storage areas and dry stack tailing facility areas. The distance between dry stack tailing and filter press are about 1-1,5km, and also the distance between pits and plant site approximately 2-3 km respectively, all access roads are enclosed with fences.

Figure 2 shows the traffic routes for the Lapseki Project’s operation phase where the yellow routes indicate on-site routes. For the construction phase, no additional road construction was done and existing main road has been used and will be used during operation. On-site roads construction was completed.

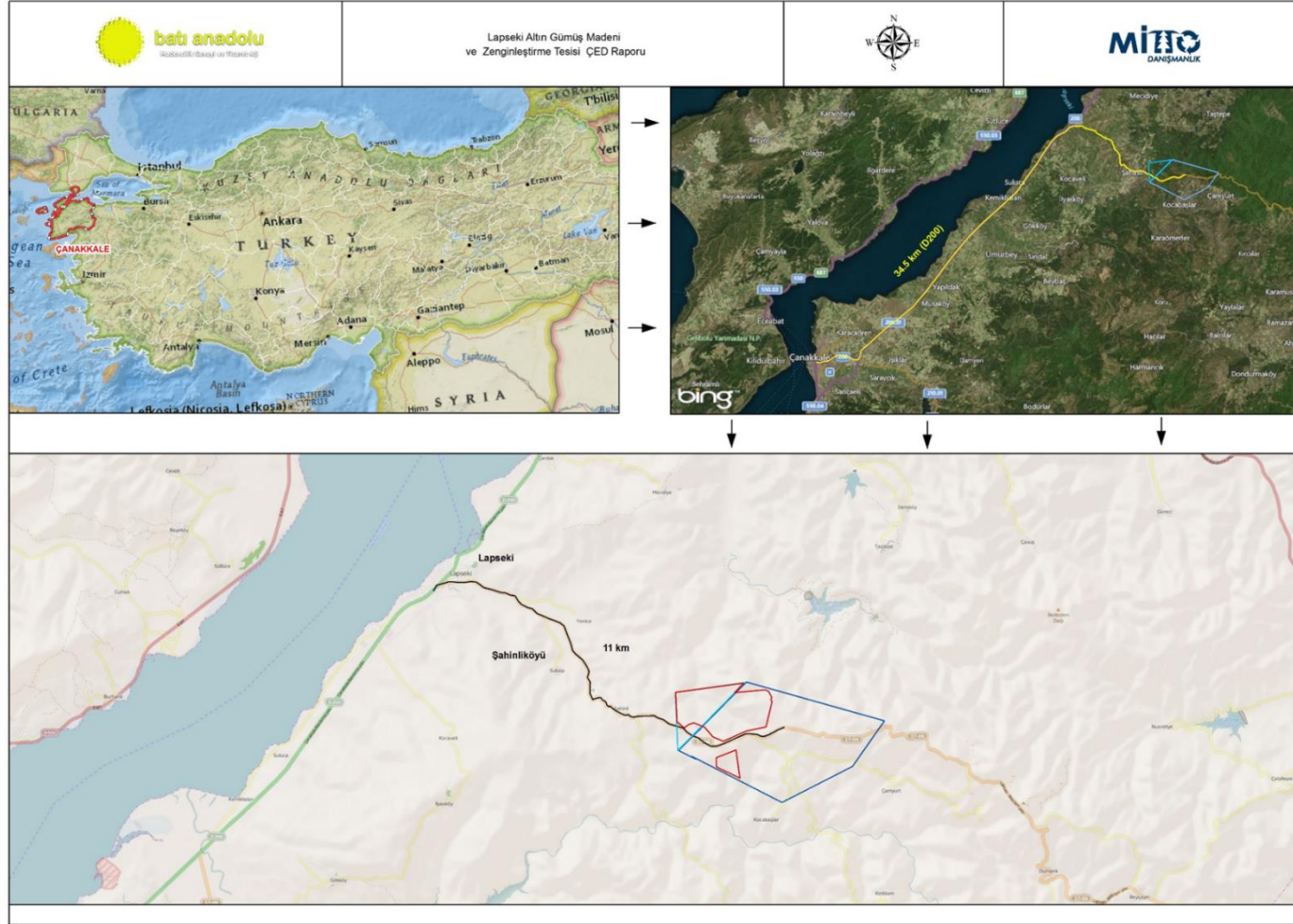


Figure 1: Lapseki Project Location Map

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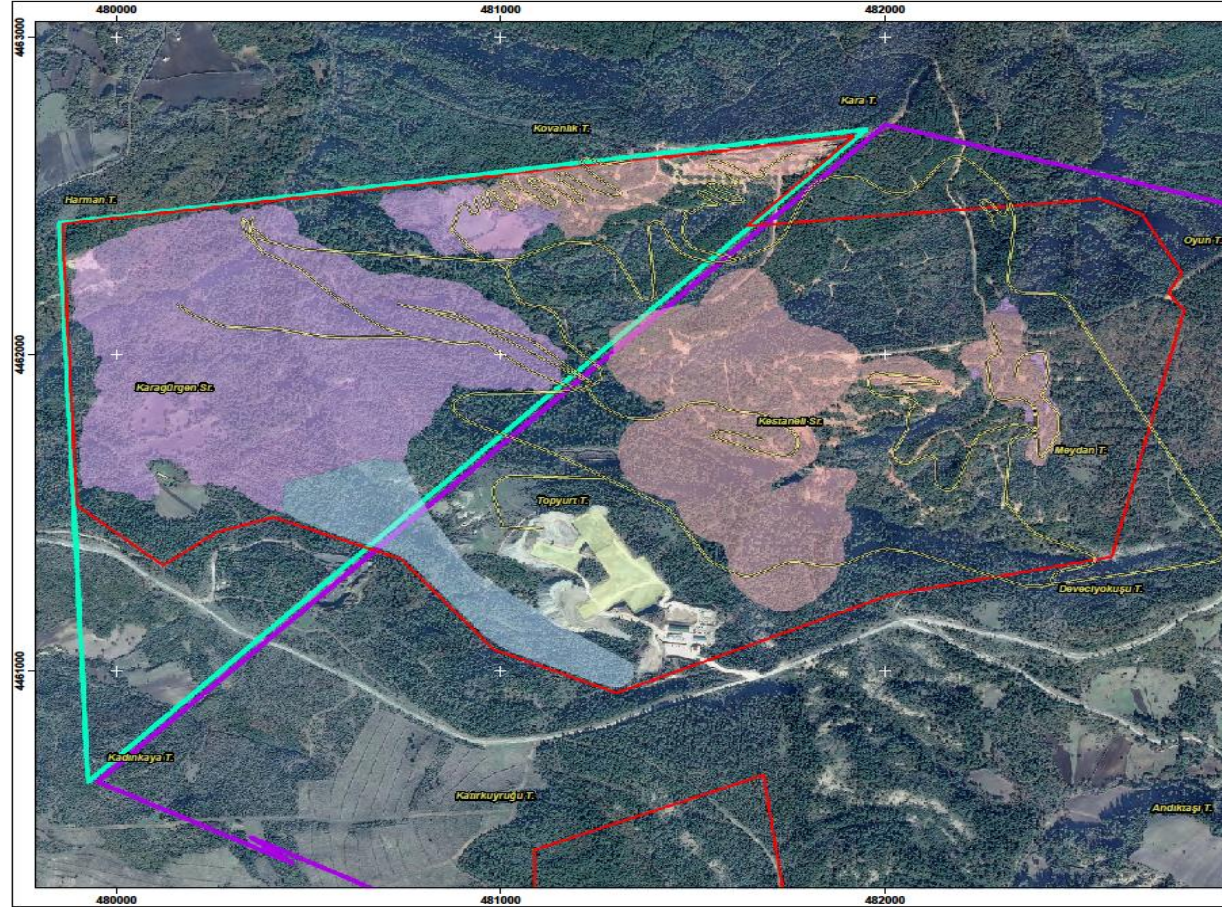


Figure 2: On Site Traffic Routes for Lapseki Project

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6.1.1 Lapseki Mine and Existing Traffic

An actual traffic count was performed during one day period on 18.01.2017 on a Saturday where there is the local market representing the duration for maximum traffic on the roads. The counting was at a point located on “Biga-Lapseki Road” approximately at 1.5 km distance from Lapseki Town Centre towards Şahinli Village direction. The results of this exercise are presented in Table 2.

Within the scope of project, vehicles that will carry machinery and equipment to the mine site, as well as those that will carry consumables and service busses that will carry the personnel will cause a temporary increase in the traffic load mainly during operation. An estimation of the increase in traffic load during operation is presented below.

Table 2: Information of Traffic Load Increase

Vehicle Type	Number of Vehicles at Counting point	Number of Vehicles Stipulated within the Project	Traffic Load Increase (%)
Trailer	1	-	-
Truck	112	11	9.80
Bus	17	-	-
Minibus/Minibus	84	-	-
Car	890	20	3.24
Motorcycle	57	-	-
Tractor	47	4	8.50
Other	4	-	-
Total	1.212	35	2.88

Assuming that all of the vehicles to be used within the project are actively in traffic and passing through the same point, the expected traffic load increase is %2.88 during operation.

6.2 İvrindi Project

It is planned that İvrindi Gold and Silver Mine and Processing Project is carried out by TÜMAD within Balıkesir province, İvrindi district Değirmenbaşı and Küçükilıca neighbourhoods.

Within the scope of the project, the gold and silver ore will be produce from 4 mines (they are named as Ballıktepe, Karteldere, Kabaktepe, and Güney Burun) by the method of open pit mining with blasting. The ore produced will be subjected to the enrichment process by the method of heap leach and dore will be acquired as final product.

Project location map is given in Figure 3. The route planned to be used during construction phase is shown in yellow route in Figure 4. Operation phase mine site traffic routes are not yet defined.

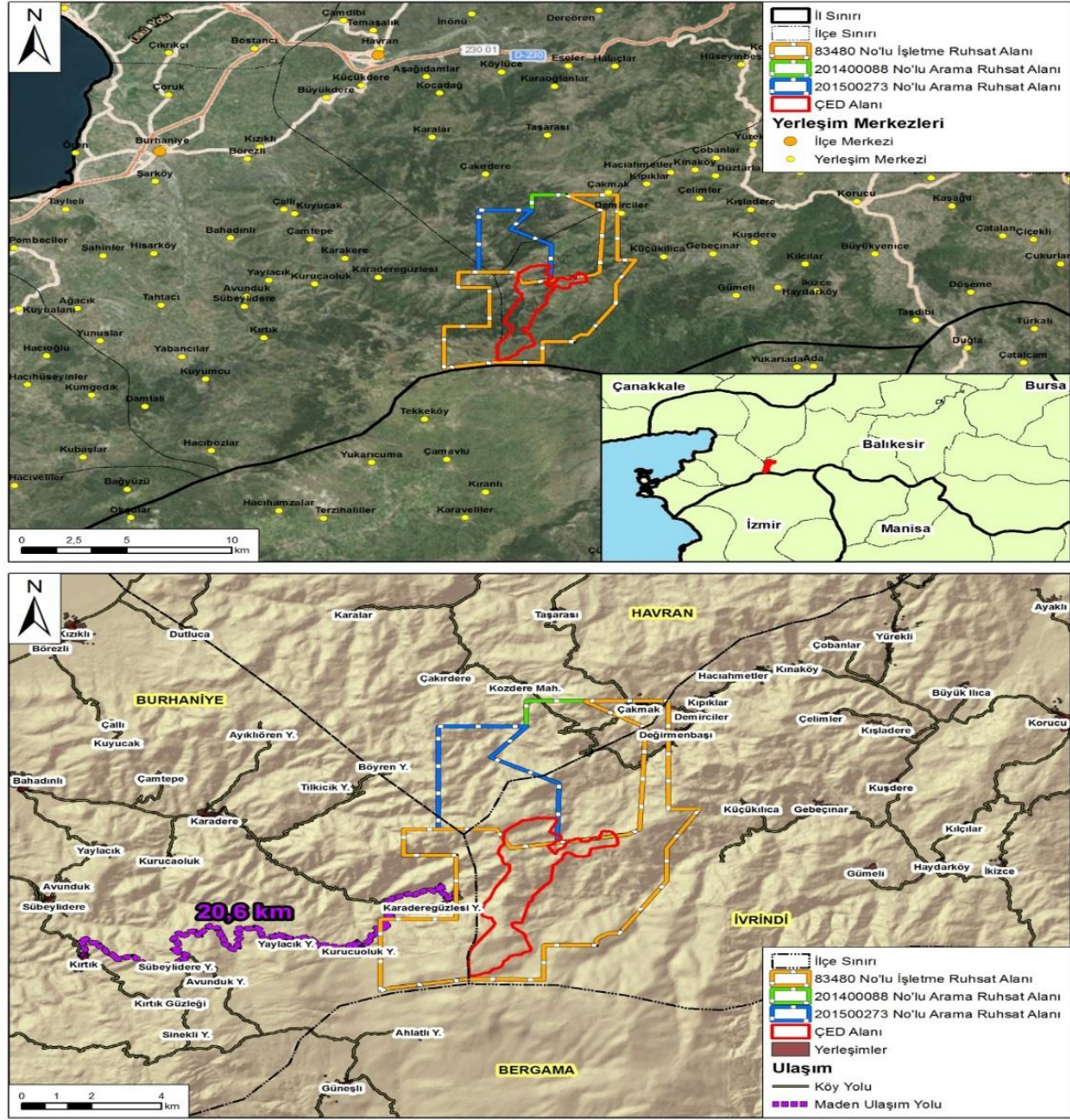


Figure 3: İvrindi Project Location Map

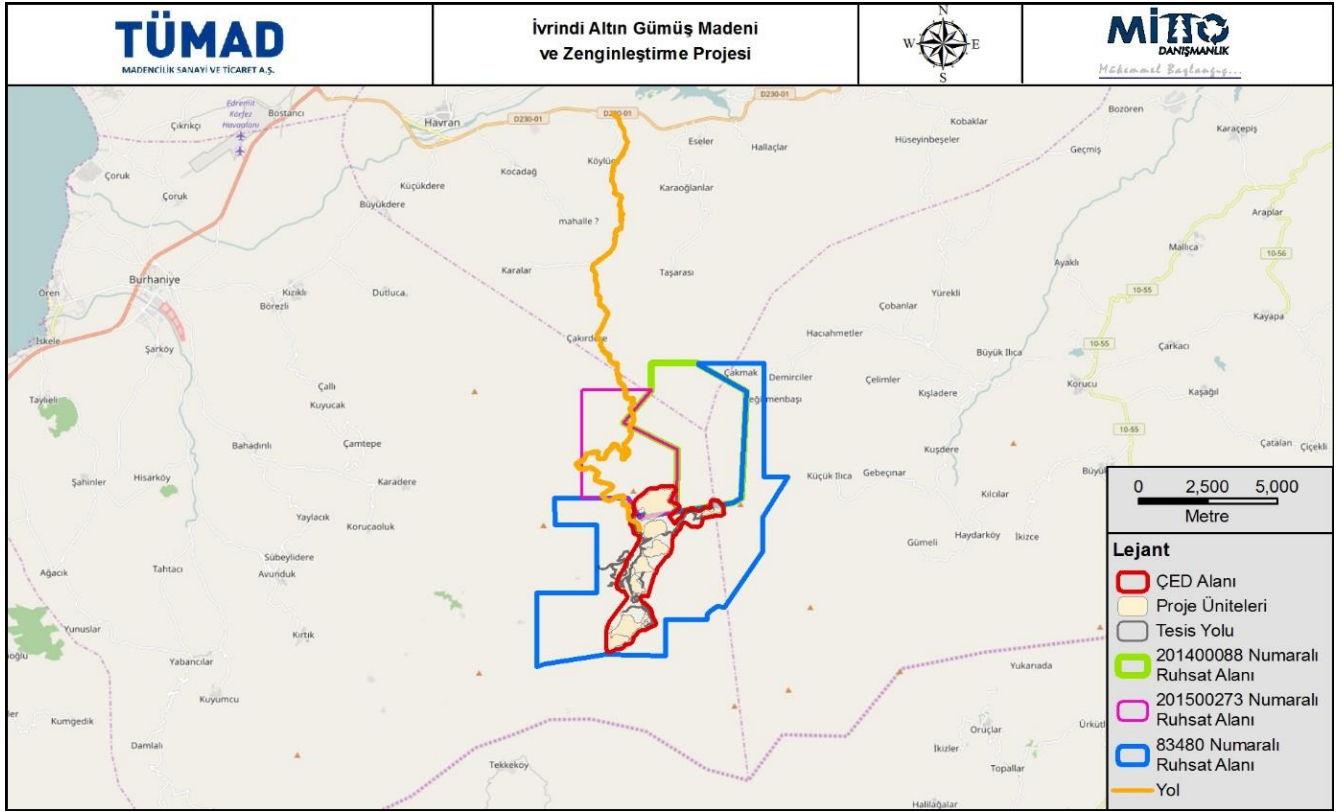


Figure 4: İvrindi Project Site Routes

6.2.1 İvrindi Mine and Existing Traffic

For İvrindi Project a new road connection was built to connect Edremit-Balikesir Public Road to the Mine site. The existing traffic load is currently zero at this road.

The public authority data on the traffic load on the section of the Edremit to Havran is 8746 as seen in the following Figure.

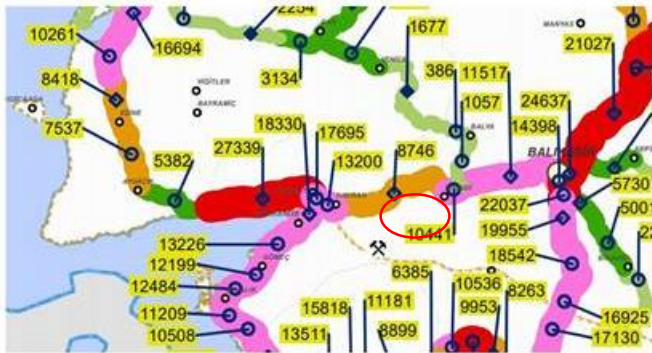


Figure 5: Existing Traffic Load on Edremit - Havran

Within the scope of project, vehicles that will carry machinery and equipment to the mine site, as well as those that will carry consumables and service busses that will carry the personnel will cause a temporary increase in the traffic load mainly during operation. An estimation of the increase in traffic load during operation is presented below.

Assuming that all of the vehicles to be used within the project are actively in traffic and passing through the Edremit Havran section, the expected traffic load increase is 0.008% during operation. The traffic load during construction will be similar to this figure.

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Table 3: Traffic Count (Current and Estimated) for İvrindi Project

Hour/Vehicle	Trailer	Truck	Bus	Minibus	Car	Motor Cycle	Tractor	Other	Total
Current Traffic Load									8746
Operational Traffic Load	1	18	20	14	10			10	73
Traffic Load Increase									0.008

7 MITIGATION MEASURES AND MANAGEMENT CONTROLS

7.1 EIA requirements

Turkish EIA commitments for both Projects including the mitigation measures to be implemented related to traffic management are given in Section 4.2 of this Plan.

7.2 Other Mitigation Measures

TÜMAD will minimize traffic impacts through designing and building bypass routes and identifying and performing road upgrades, in consultation with relevant authorities, all necessary warning signage on public roads that are used for Projects' transportation.

Communication and Disclosure of Traffic Management Plan

Traffic management plan shall be communicated;

- to all TÜMAD and contracting personnel, initially by site induction, additional information shall be conveyed by toolbox meetings and safety meetings.
- to all visitor by site induction
- to affected communities and other stakeholders at stakeholder engagement meetings and with hard copies of the traffic management plan available at the TÜMAD site office and safety office for review of
- to all stakeholders through disclosure at TÜMAD's website

Communication is important part of the plan during preparation and application of the plan in the field. For that reason, TÜMAD will carefully take the all required measures in order to form strong and continuous communication of traffic plan among all stakeholders. All of the TÜMAD personnel will be trained in inductions and orientations concerning traffic management plan before they enter the site.

Same methodology will also be applied to all of the contractors to be working on the fields. These trainings will be given by OHS department. After these trainings are completed, they will signed and recorded. All visitors to site will also be subjected to same safety induction and as part of the safety induction they will also be briefed for key parameters of the plan as well.

OHS department will also issue toolbox document and training to overall site personnel including TÜMAD and all contractors in order to refresh the ground rules of the Traffic Management Plans. If needed, there will be separate training sessions for refreshment and reminder of the program.

In case any change is required in Traffic Management of the site, overall site will be notified for duration and place of the change. Print copies of the notifications will also be put in the overall site.

Community will also be informed in order to increase awareness and knowledge of Traffic Management plan in regular meetings with local communities. Services routes and schedules will clearly be communicated to local community. Printed out copies will be available on operation offices. Special care to schools and children will be given in order to increase their awareness regarding overall Traffic flow of in the project area.

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Additional community awareness and road safety trainings will be provided to the school children during operation phase of Lapseki Project and construction and operation phases of İvrindi Project through a community awareness and road safety training programme.

The community relations team will communicate transport route(s) and predicted schedule to communities where the transport route(s) run close to or through villages.

Emergency Situation Plan for Traffic/Vehicle Management

For each mine, there are ambulances, rot-fire vehicles and firefighting trucks in order to take action at once. In the operation teams, there always be main and standby drivers among operators even in the shifts so that these vehicles can be used in case of needed Emergency vehicles shall have right of way on the mine site at all times. Vehicles shall be informed either by radio communications or upon hearing the warning siren, relocate the vehicle to the nearest off road position and turn of the ignition. All personnel shall cease work activities and proceed to nominated assembly areas (Reference is made to Emergency Action Plan (TMD_ISG_PLN.002)). As stated in emergency action plans, radio channel of VHF1, sirens, all related traffic and emergency signs will be on the site area. Muster points and all related maps as well as signs will be operational on the project sited as described in the emergency action plan

Driving Safety

- All drivers shall have defensive, offensive, advance driving, off-road driving training.
- All vehicles must have a top lamp at mine site.
- The persons who have the field driving license can use the vehicle by being tested by the OHS Department (Field Driving Rules Procedures-TMD_ISG_PRD.016- Field Driving Rules Procedures & Delegation Procedures TMD_ISG_PRD.015, General Field Driver's License Evaluation Form)(TMD_ISG_FRM.035)
- All vehicle occupants shall always be in a driver or passenger seat and wear a seatbelt.
- The driver shall not put the vehicle into motion until all occupants have fastened their seatbelts.
- Drivers shall wear suitable sturdy footwear whilst driving. ("Flip-flops" are not permitted).
- Heavy vehicle drivers shall wear safety shoes whilst on duty.
- Drivers shall remove ignition keys from the vehicle when it is not in use.
- Drivers shall not use cell phones – including "hands-free" units - while driving. It is also strongly recommended that drivers stop their vehicles in a safe position when receiving or making radio calls.

Vehicle Maintenance and Inspection

TÜMAD's, Visitor, and Contractors e.tc. All vehicles shall be subject to periodic maintenance and inspections.

- Maintenance Period - Time or Distance Based
- Equipment / Vehicle Maintenance Areas
- Inspections
- First Use Inspections
- Daily Checks
- Safety Inspections – Time or Distance Based

Reversing

- Prior to reversing, drivers of long vehicles shall ensure that banksman or spotters are available to ensure safe reversing.
- Where necessary, reverse alarms will be installed to large/long vehicles and work machines.
- All vehicles parking shall reverse into their parking spaces. Owners of personal vehicles, subcontractors and visitors are expected to comply with safe reversing plans.

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Regular Control of Project and Vehicles

Visitors, delivery vehicles and plant entering the site are required to report to the TÜMAD office to enter. Delivery of materials and entry of vehicles on site will be managed on a daily basis by Mechanical Department and their vouching will be done by Security. Before entrance to the mine site, all vehicles have to be checked (ID check, Mechanical check,) by mechanical department. In line with the vehicle control form (TMD_İSG_FRM.035)

Road Signage

Traffic movement shall be controlled in all construction areas by the installation of signage at predetermined locations, indicating: travel direction, speed limitations, and right of way.

Signage shall be installed and displayed to satisfy:

- Direction
- Safe Movement
- Speed Limitation

Location requirements:

- Signage is within driver's vision.
- Signage cannot be obscured / blocked.
- Signage cannot obscure other signage from the driver's vision.
- Signage cannot become a hazard.
- Signage cannot direct traffic into an undesirable path.

Vehicle safety equipment

All equipment and vehicles, shall have an operational flashing identification light attached at all times during movement on the construction site and mining lease.

All equipment and vehicles, shall have an operational audible reversing alarm. Light vehicles shall carry a first aid kit and vehicle fire extinguisher with a current inspection tag.

Signage and Speed Restrictions and Move off Procedures

Speed limits for cars and trucks are defined in Figure 6 for Lapseki and İvrindi Projects and will be complied by all TÜMAD and contractor drivers.

All equipment and vehicles, shall comply with traffic signage located in the construction area and mine site area.

All equipment and vehicles, outside the perimeter of the construction area, both Lapseki and İvrindi mining lease shall be subject to the speed restrictions and vehicle operations move off procedure imposed by the TÜMAD management. All vehicles and plant shall use the following vehicle operation horn signals must be used in all areas:

- Engine start – single blast.
- Move off forward – two blasts.
- Move off reverse – three blasts.

Operating (stationary) plant, equipment, shall have high-visibility cones separating the operational area from areas of moving traffic.

All equipment and vehicles, will not be left unattended whilst in operation. All equipment and vehicles not in operation will be deactivated. Additional personnel will be made available, should operations require the use of a spotter/guide, (restricted areas of movement, restricted vision, and congested areas).

- Wearing seat belts is compulsory in all TÜMAD services and contractor, equipment and vehicles.
- Overtaking of a moving vehicle on the construction site is prohibited at all times.

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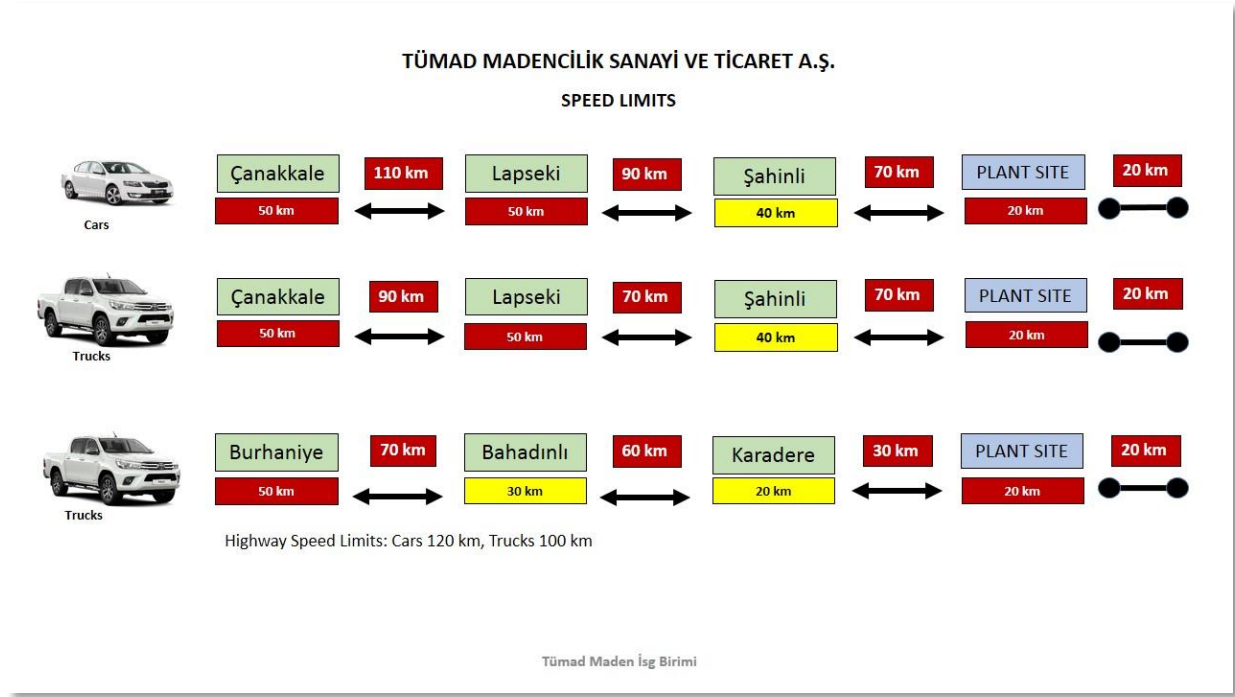


Figure 6: Lapseki and İvrindi Projects Speed Limits

Awareness and Respect for Other Road Users

For drivers are travelling through built up areas such as towns and villages, there should be an establishment of culturally appropriate courteous behaviour to minimize potential conflicts. Specific measure includes:

- Minimizing the use of fog-lights and beams
- Minimizing the use of compression braking
- Only parking in designated areas
- Consideration of vulnerable users such as pedestrians and cyclists
- Implement dust control measures such as watering or roads, speed restrictions, travel time restrictions, reducing the use of heavy vehicles on unsealed roads.

Bus routes are identified in both Projects in the surrounding road networks particularly that of school bus routes. School children pick up/drop off points and service times will be identified. This will allow heavy vehicles to actively avoid these times. Thus TÜMAD reviews and considers school bus and pickup and drop off times along the access routes when programming heavy traffic movement.

Before and during the construction period of İvrindi Project, special training will be given in nearby schools to increase awareness of road safety.

Unloading / Loading

- Unloading and uploading of vehicles shall take place away from general access areas, roads, and sidewalks. No unloading/uploading shall take place near overhead electric cables, where there is possibility of a person unloading or uploading the vehicle coming into contact with them. The vehicles' routes shall be identified based on the lowest overhead electric cable height and measures shall be applied to ensure safe distance from overhead transmission lines.
- Drivers of vehicles shall be in a safe place unless required to advice on the distribution of the load. If appropriate, warning tapes shall be placed around the unloading/uploading operation.
- No vehicles shall be loaded beyond its rated capacity or beyond the legal limit of gross weight. Persons not involved in the operation should not be present in the vicinity.
- Loads containing hazardous materials should be advised prior to arrival and safety data sheet should be made available to enable forward planning to take place.

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Critical Transport

Critical transport is the transport performed by long vehicles (greater than or equal to 12m) or transport carrying heavy loads (applied load greater than or equal to 10 tons per square meter). Critical transport carries risks, especially for the manoeuvring of the vehicle and the strength of the new or already present culverts. TÜMAD will utilize routes inside fenced construction areas as much as practicable for the transportation.

In any case, following measures will be taken:

- The load will be placed on the trailer in balance and will be secured by using chain hoists or come-along,
- The route will be analysed for the safe transportation, including the width and the strength of the route (culverts), the overhead clearance and the turning radius for the roads,
- OHS Department will be informed about the route and the time of transportation,
- Banksman at the front and the end of vehicle will be available for guidance,
- Another vehicle will lead the transport in advance to clear the road and warn the other parties.

Grievance Mechanism

Communities and project personnel will be made aware of the grievance mechanism in case they wish to report a project related traffic incident.

7.3 Specific Traffic Management Applications for the Operation Phase

Mine Site Access

In the interest of site security and public safety, access to operational areas related to mine sites will be restricted to authorized site personnel through the usage of signs, gates and security personnel where appropriate. Security cameras are available at Lapseki Project site where it is possible to monitor and assess the site traffic. Security cameras will also be placed at İvrindi Project site. Clear procedures will be in place for entering and leaving mine site. Facilities that potentially present danger to persons or wildlife such as the electrical substation and settling ponds will be fenced or barricaded as appropriate to prevent access. The barriers need to be effective, but at the same time ensure that they are not harmful to people, farm animals or wildlife. All mine traffic on haul routes will be radio controlled. Signage will be installed at appropriate locations in order to warn the public of haul routes.

In the event that temporary closure occurs, access to mine and mill sites will be further restricted through the use of fences and gates as appropriate. Buildings and ancillary facilities will be locked and secured; road management and public safety and construction events notification are presented here:

- Private employee off-road vehicles will be prohibited on the mine access roads and at the mine site.
- Snow cleaning will be done on site to maintain the mine access roads.
- Signage will be posted near all construction areas.

Employee Transportation

To the extent possible employees will use project shuttle services from the nearest villages to the mine sites, thereby reducing overall vehicle traffic. Fleet vehicles will be utilized by staff as necessary. Lapseki Project's shuttle service routes and frequencies are given in Appendix 2. İvrindi Project shuttle service routes and frequencies will also be determined.

Speed Limits

Speed limits will be enforced for mine traffic and posted along the access and site roads (maximum 40 km/hr, reduced to 20 km/hr at blind corners and bridge crossings). Mine traffic on the mine and mill access roads will be radio controlled for safety and speed control. Speed limits will be monitored using a GPS device for all TÜMAD vehicles.

Employees and contractors will be educated on road safety including traffic protocols and speed limits during mandatory orientation. Routine traffic inspections and/or speed indicator signs will be used to encourage safe and responsible driving and ensure that TÜMAD traffic and safety protocol are adhered to. TÜMAD will investigate and take appropriate modification of policy and/or disciplinary action in the event of any traffic incidents or complaints. Incident Accident Loss Investigation and Reporting Procedures (TMD_İSG_PRD.007) Disciplinary Procedure (TMD_İK_PRD.004).

Designated Parking

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A predetermined area will be delineated for office and personnel parking at the mine entrance. The nominated parking area shall be marked with removable high visibility barricading securely attached

Signage shall be displayed at the entrance to the car parking facility, indicating location of office and visitors vehicle parking area.

Signage shall be displayed indicating reverse parking only.

7.4 Management Controls

TÜMAD's basic management control and precautions for both construction and operation phase are listed below.

Table 4: Basic Management Controls for both Lapseki and İvrindi Projects Construction and Operation Phases

Topic/ Aspect	Applicability / Activity	Status	Control Description	Responsible Parties	Means of verification
Traffic Baseline study	Traffic Survey	Completed for Lapseki and İvrindi Projects	Determination of the existing traffic load Estimation of traffic increase (Appendix-A Traffic Risk Assessment)	IMS and Sustainability Manager	Baseline data
Traffic Baseline study	Road Survey Risk Assessment	Completed for Lapseki Ongoing for İvrindi	Determination of the existing road infrastructure Identify improvement areas for the roads	Open Pit Superintendent Contractor managers Head of Community Relations Department	Road survey report
Transport Route & Plan Project Schedule	Transport Community Health & Safety	Started for Lapseki and will continue during operation Started for İvrindi and will continue during construction and operation	Communicate transport route(s) and predicted schedule to communities where the transport route(s), projects and design through Şahinli & Kocabaşlar villages for Lapseki and Değirmenbaşı and Küçükılıca Villages for İvrindi.	Head of Community Relations Department Head of Finance and Administrative Affair Department	Records (e.g. meeting minutes) of community consultations.

Topic/ Aspect	Applicability / Activity	Status	Control Description	Responsible Parties	Means of verification
Road Infrastructure	Transport	<p>Perform road improvement works in coordination with authorities</p> <p>For Lapseki Project, TÜMAD conducted the expansion and improvement of the surface coating of the Lapseki-Beyçayır road.</p> <p>In the İvrindi project, the existing forest road (Çakırdere-Mine Site Road) was expanded to 8 meters and qualified and the new transportation route was completed.</p>	<p>Design existing road, in consultation with the Regional Directorate of Highway</p> <p>Continuous visual inspection along the haulage roads and engagement with the local communities to follow up any grievances regarding traffic management (i.e. dust, noise)</p>	<p>Project / Operations Manager</p> <p>Head of finance and administrative affair dep.</p> <p>Head of OHS and Community Relations</p>	<p>“As-built” inspection records for all new and upgraded roads.</p>
Driver Training	Driving	<p>Training for drivers were performed during construction phase of Lapseki.</p> <p>A driver training programme will be implemented for operation phase for Lapseki.</p> <p>A driver training programme will be implemented for construction and operation phase for İvrindi</p>	<p>Prepare and deliver driver safety training for drivers and operators addressing both offensive and defensive driving off road advance driving skills. This is mandatory for all TÜMAD and Contractor drivers working at the site.</p>	<p>Head of Health and Safety Department</p> <p>Chief of HR Department</p> <p>Head of Financial and Administrative Affair</p>	<p>Training records.</p>
Traffic and Transport Hazards	Transport	<p>Performed during construction phase of Lapseki.</p> <p>A training programme will be implemented for operation phase for Lapseki.</p> <p>A training programme will be implemented for construction and operation phase for İvrindi.</p>	<p>Develop and implement a Traffic and Transport Hazards Training Programme for all employees and contractors addressing transport to site and traffic within the mine working areas.</p> <p>For both Lapseki and İvrindi Projects, Site Special driving license (pit drivers permit) is required to drive</p>	<p>Head of Health, Safety Department,</p> <p>Chief Health and Safety</p>	<p>Records of training programmer Attendance.</p>

Topic/ Aspect	Applicability / Activity	Status	Control Description	Responsible Parties	Means of verification
Traffic and Transport Hazards	Transport	Completed for Lapseki with the completion of construction. To be performed for Lapseki for construction phase To be performed for İvrindi for construction and operation phase	Identify and install all necessary traffic warning signage within the mine working areas. All time, speed limits will be monitored using GPS vehicle tracking system which will be installed on all TÜMAD vehicles. Drivers found speeding will be subjected to disciplinary penalty as stated in Disciplinary Procedures.	Head of OHS Department, Chief Health and Safety	Erected and maintained signage. Speed limit records
Road Safety	Vehicle Inspections	Continuous for both Project's construction and operation phases.	Vehicles are maintaining in accordance with manufacturer guidelines and Turkish licensing requirements and periodic verification inspections will be undertaken.	Head of Health and Safety Department Chief of HR Department Head of Financial and Administrative Affair	Vehicle maintenance records
Road Safety	Fit for Work	Continuous for both Project's construction and operation phases.	All drivers must be fit for work. Employees must not drive after consuming alcoholic beverages and illegal drugs. The Project and site limit is 0%. Supervisors and drivers must ensure that drivers are not fatigued when operating a vehicle. Alcohol and Drug Addiction Procedure (TMD_İSG_PRD.004). Alcohol Control Instruction (TMD_GUV_TLM.002)	All vehicle users	Records review
Traffic	On-site Traffic Management	Continuous for both Project's construction and operation phases.	Support Construction and Operation staff in the planning and coordination of traffic management activities.	OHS, Environment and Training Department Heads and Officer(s)	Completed traffic management plan.
Traffic Incidents	Transport	Community Health, Safety and Security Management Framework is prepared for both mines. Community Health, Safety and Security Management Plan will be prepared for Lapseki operation and construction and operation phase for İvrindi construction and operation phases.	Develop and implement a Road Safety Awareness Programme as part of the Community Health, Safety and Security Management Plan for local communities.	Head of Community Relations Department	Implementation records for the CHSS Plan.

Topic/ Aspect	Applicability / Activity	Status	Control Description	Responsible Parties	Means of verification
Road Safety	Stakeholder Engagement	A road safety and traffic awareness programme will be implemented for operation phase of Lapseki. A road safety and traffic awareness programme will be implemented for construction and operation phase of İvrindi.	A road safety and traffic awareness programme will be implemented with local communities along transport routes heavily used by TÜMAD Community Health, Safety & Security Management Plan.	Head of Community Relations Department	Implementation of road safety programme
Traffic	Transport	TÜMAD monitored the truck awnings coverage during construction phase which will continue during operation phase.	TÜMAD will ensure that truck awnings will be covered at all times during construction and operation periods of İvrindi Project and operation phase of Lapseki Project.	Department of Security and OHS	Number of grievances
Traffic and Transport Hazards	Transport	Incident Accident and Loss Reporting Procedures (TMD_İSG_PRD.007) has started to be implemented in Lapseki and İvrindi Projects.	All drivers are required to report any type of road traffic accident including Human harm, animal harm, property damage and, spillages (i.e. chemicals)	Department of Environment and OHS	Accident/incident reports
Traffic and Transport Hazards	Contractor Management	TÜMAD ensured that the contractors comply with the Project standards in accordance with the Contractor Management Plan (TMD_İSG_PLN.003) for Lapseki construction phase. TÜMAD will control contractors' compliance with the Project Standards in the operation phase of Lapseki and construction and operation phases of İvrindi Projects.	TÜMAD will control the contractors for the driver's competency and training records, vehicles maintenance records, emergency response procedures and implementation of the requirements set in this plan.	Department of OHS Administrative affairs	Competency and training records

8 MONITORING

The Monitoring measures that are to be implemented during the construction and operation phases to assess compliance with Project Standards (see Section 4: Project Standards) are described in this section.

In the event that monitoring identified non-conformance with Project Standards, these will be investigated and appropriate corrective actions identified in line with the Non-conformance incident and action management of the TÜMAD ESMS.

8.1 Key Monitoring Measures

Key Monitoring Measures Are Listed Below:

Table 5: Key Monitoring Measures

No	Topic/ Aspects	Methods	Frequency	Responsible
TMP-01	Speed Limits	Speed limits will be monitored using GPS vehicle tracking systems which will be installed on all TÜMAD vehicles and will be required on contractor vehicles where necessary and practicable. Drivers found speeding will be subject to disciplinary action.	Continuous monitoring	Head of OHS Department
TMP-02	Accidents/incidents	All TÜMAD drivers will be required to report all report any type of road traffic accident including human harm, animal harm, property damage and, spillages (i.e. chemicals)	Daily	Head of OHS Department
TMP-03	Driver competency and training	All TÜMAD and contractor drivers will comply with the minimum driver training requirements defined by TÜMAD. All drivers will be required to hold a valid Turkish driving license as well as having attended required TÜMAD training courses and holding appropriate internal permits. Chemical Suppliers will provide evidence to TÜMAD of similar training for drivers.	Records maintained and up to date	Head of OHS Department
TMP-04	Contractor Management	TÜMAD will establish an inspection and audit programme to assess contractors' performance with respect to this Transport Management Plan, including: - Review of Contractors' ability to meet the requirements of this plan prior to appointment -Contractors' emergency response procedure (including actions to be undertaken by drivers) -Audit of driver competency -Vehicle equipment and maintenance records (daily) - Drivers' training records.	Prior to a contractor's initial appointment and then on daily/weekly basis. This frequency can be adjusted depending on contractor's performance over time.	Contractor's Manager
TMP-05	Inspections	Visual inspection, by the TÜMAD Head of Environment of dust levels, particularly during construction, along the haulage routes and in particular at sensitive locations e.g. residential areas.	Following road construction and/or upgrading and In the event of a complaint	Head of Environment

No	Topic/ Aspects	Methods	Frequency	Responsible
TMP-06	Impact on communities	TÜMAD will continue to engage with local communities adjacent to haulage routes (specifically the bypass road and site access road) to establish the extent of impact caused by Project traffic.	On-going	Head of Community Relations Department
TMP-07	Road Infrastructure	Arrangement and design on routes and upgrades. Identify and install, in consultation with relevant authorities, all necessary warning signage on public roads that are used for Project transportation.	On-going	Operations Manager
TMP-08	Traffic	Community awareness and road safety training programme to be developed and implemented.	Annually	Head of Community Relations Department
TMP-09	Traffic	Manage the day-to-day delivery of materials and entry of vehicles onto the site.	On-going	Security and OHS Departments
TMP-10	Traffic	Cover all dump truck loads with tarpaulins to minimise dust.	On-going	Drivers/Head of OHS and Environments
TMP-11	Traffic	Vehicles will be maintained in accordance with manufacturer guidelines and Turkish licensing requirements and periodic verification inspections will be undertaken.	As per legally required/manufacturer requirements	Maintenance and Repair Department
TMP-12	Fit for work	All drivers must be fit for work. Employees must not drive after consuming alcoholic beverages and illegal drugs.	On-going	Head of OHS Department

8.2 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 6: Key Performance Indicators and monitoring actions

NO	KPI	Target	Monitoring Measure
TMP-KPI-01	Number of drivers found to be exceeding speed limits of driving unsafe	Zero per year	Review of records of driver speeding and reported safety incidents
TMP-KPI-02	Number of road traffic accidents involving: <ul style="list-style-type: none"> Human harm Property Damage 	Minimize with a target of zero per year	Analysis of incident reporting records

	<ul style="list-style-type: none"> • Spillages • Wildlife collisions 		
TMP-KPI-03	Number of transport related complaints from local communities	Minimize with a target of zero per year	Grievance records
TMP-KPI-04	Reported non-compliances against the mitigation controls identified in this Traffic Management Plan	Minimise and achieve continuous improvement in number of reported non-compliances	NCRs and corrective actions, reports.

9 TRAINING

All employees of TÜMAD and their Sub-contractors working at Lapseki and İvrindi Silver and Gold mine site will be provided with general induction, site specific induction, health and safety, environmental awareness and community relation training before entering to the site.

All drivers must have valid driving license and they should have necessary trainings taken (off road, defensive driving, advanced driving etc.) to drive in mine site.

Community awareness and road safety training will be provided to the school children during operation phase of Lapseki Mine and construction and operation phases of İvrindi through a community awareness and road safety training programme.

10 AUDIT

All incident and non-conformities will be reported as per the requirements of the Incident Accident & Loss Investigation and Reporting Procedures (TMD_İSG_PRD.007). Any incident identified during these inspection will be reported by H&S team, daily inspection will be carried out by operational area supervision covering a broad range of operational aspects including community health safety and security issues as appropriate to activities outside the Mine Licence Area.

External Auditing

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

11 REPORTING

Inspections, incidents and non-compliances shall be documented and administered in accordance with the Instructions and Procedures of TÜMAD Madencilik Sanayi ve Ticaret A.Ş.

APPENDIX 1 – TRAFFIC RISK ASSESSMENT MATRIX

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Table 7: Traffic Risk Assessment Matrix

TÜMAD Mining Industry and Trade Inc. Çanakkale Lapseki Operational Risk Assessment Team												Date: 13.03.2017					
Job description			Danger identification			Risk Assessment				Risk Control Steps			Post-Risk Control Evaluation				
No	Place	Work done	At Risk	Dangers	Risks	Possibility	Severity	R.D.	Existing measures	Precautions		Those responsible	Deadline	Possibility	Severity	R.D.	
1	Service	Driving	Employees, visitors, pedestrians	Overcoming the Capacity of Passengers and Loads	Traffic Accidents, Deaths, Serious Injuries	2	5	10		The number of passengers to be carried on the vehicles and the maximum load must not exceed the number specified in the motor vehicle registration certificate. The driver must comply with all traffic rules. 3rd party passengers are forbidden. It is forbidden to take passengers or passengers out of the specified route.		Site Managers, Drivers	During Operations	1	5	5	
2	Service	Driving	Employees, visitors, pedestrians	Overcoming the Speed Limit	Traffic Accidents, Deaths, Serious Injuries	2	5	10	Speed regulations of highways and Şahinli Region determined by OHS Board Decision	The speed of service vehicles cannot exceed 70 km / h in divided roads. The speed of service vehicles cannot exceed 50 km per hour on village roads and 40 km on Şahinli, Kocabaşlar, Değirmenbaşı, Küçükılıca villages limit. The seat should not be changed and should not be standing while on the move. The driver should not talk to the phone while driving.		Site Managers, Drivers	During Operations	1	5	5	
3	Vehicles and Safe Driving	Driving	Employees, visitors, pedestrians	Vehicle Hardware Impairment	Traffic Accidents, Deaths, Serious Injuries	2	5	10	Licenced drivers are working	The driver must check the equipment of the vehicle (Wheels, Headlights, signals, wipers, brake system etc.) Windows should always be clean. The vehicle must be new, suitable for land conditions. Regular maintenance should be done. Every passenger must wear a seat belt. First Aid Kit, Traffic Set and Fire Extinguisher must be found in vehicle. There must be optical and / or acoustic signals to indicate that the doors are open or closed.		OS Specialist, Site Managers, Drivers	During Operations	1	5	5	
4	Vehicles and Safe Driving	Driving	Employees, visitors, pedestrians	Vehicle Crash	Traffic Accidents, Deaths, Serious Injuries	2	5	10	Markings ordered	Vehicle paths and pedestrian paths must be separated. Car drivers should be given safe driving trainings. Speed limits in work areas should not exceed 20 km / h. Warning signs that determine the speed limit must be hung in the roadway.		OS Specialist, Sub-Contractor	During Operations	1	5	5	
5	Transport	Material Handling	Traffic Vehicles, Employees, 3rd Contacts	Ineligible Upload	Injury, Property Damage	2	4	8		Carrying / transporting should be done with vehicles of suitable capacity and length for material transportation. Loading capacity shall be made by fitting with the fixing lines and the cloth slings in accordance with the Rules of Highways, at least three points separately from each other, with the markings according to the regulations of the health safety signs and the warning lights and signs on the ends. Drivers must comply with speed limits, capacity should not be exceeded. When transporting heavy loads, the road must be assessed and a feasibility should be established in accordance with the condition of the material being shipped. It is necessary to calculate the obstacles etc. on the road.		Employer Deputies, Division Supervisors	During Operations	1	4	4	
6	Assembly	Concrete Pavilion	Employees, Materials	Load Shift	Injury, Death	2	5	10		Before the work is done, the work plan should be done and the work should be done with the single crane and suitable capacity slings at the appropriate capacity (three times the size of the tarpone). If this is not possible, two cranes will be installed on the front and rear cranes, with the front part of the crane on the front and the rear part on the rear. This lift should be done with a single pointer, using the radio. Work safety precautions and instructions should be followed. The side transport screws are very well tightened and should be fitted with a solid pin to prevent them from slipping forward.		OS Specialist, Operators	Throughout the operation	1	5	5	

8	Facility	Working with Heavy Machines	Employees, Visitors	Heavy Machine Movement	Injury, Death	3	5	15	Employees are given reflective clothing as PPE	Operators cannot work without operator documentation. Work cannot be carried out without the periodical maintenance by the work machines' services. Operation cannot be performed on machines without warning of safe approach. The continuity of the present controls must be ensured, the refractors on the garment and / or on the reflective vests must conform to TS EN ISO 20471. Employees should be trained on machine dangers. "Work machine collision hazard" warning sign must be put. The sound and light warning systems of the machines must be kept in continuous operation and should be checked periodically.	OS Specialist, Site Managers, Foremen	During Operations	1	5	5
9	Facility	Heavy Machinery and Tools	Employees	Heavy Machine Movement	Injury, Death	3	5	15	Education and required PPE were provided	Operator and markers should be given "marker / manoeuvre training", sound back warning systems should be in operation, certified operators should be operated. "Work machine collision hazard" warning sign must be placed. Enough lighting should be done at night.	operators, Employees	During Operations	1	5	5
12	Facility	Lifting and Removing Material	Employees	Crane Tipping	Injury, Death	2	5	10	Licensed Operators are working. Maintenance in progress.	Crane mobilization should be carried out very well. The crane feet should be chocked, the iron plate should be laid and fully opened. Pay attention to the slopes and the terrain conditions and balance. No one should be kept under load and at the crane boom. The instructions and safety rules must be strictly followed.	Operators and Rafter	Throughout the operation	1	5	5
18	Facility	Accident	Employees, 3rd Contacts, Vehicle Equipment	Insufficient Intervention	Serious Injury, Death	2	5	10	Training was given.	In order to avoid any accident, protective and preventive measures will be taken first. In case of an accident; 1. Health care is required for the health status, 2. The work accident report should be filled in, (Eyewitnesses and employer deputies (Responsible manager) in three copies.) 3. Accident location, machine equipment causing accidents, etc. Photos are taken, 4. You will be notified to the Occupational Safety Specialist and Workplace Physician, 5. Accident The gendarmerie or police is notified immediately. (Severe injuries, limb loss and death) 6. Work accident e - notification is done, (Maximum 3 (three) working days). 7. The accident file is prepared. (All these documents are kept in this file) • Declaration of Insured Employment • Introduction to Occupation / Periodic Health Report • Copy of ID Card • OSH Documents (Training Participation Forms, PPE Delivery Letter etc.) • And Other Documents (Operator's Certificate, Vocational Training Document etc.)	Site Manager, Sub-Employers, OS Specialist, Workplace Physician	During an accident	1	5	5
19	Road	Security Check	Employees, 3rd contacts, Vehicles	Failure to Control Zone Creation	Accident, Death, Serious Injury	2	5	10	Restriction is being made.	Security Entrance: Temporary Traffic Control Zone: 1- Preliminary warning field: Traffic signal Slow, Stop. Speed Limit warnings should be placed at safe distance. 2- Transition area: Markings, limitations 3- Field of study: Markings, limitations 4- Traffic area: Markings, referrals, 5- Last transition area: Markings, limitations	Employer Deputies	On the job	1	5	5
20	General	Rental Cars, Machinery & Equipment	Employees, 3rd contacts, Vehicles	Inappropriate Sub-Employer Operation	Accident, Death, Serious Injury	2	5	10		In the case of insufficient machinery or equipment for a short period of time and / or in the case of leasing or service, in the case of an auxiliary work or a part of the main work requiring the expertise of the operator and the job and technological reasons; Persons or companies that have legal compliance and have certified their qualifications must be contractually employed, and the terms of the OSH contract must be completed within them. Otherwise, no work should be done.	Employer Deputies, Sub-Employers	On the job	1	5	5
22	Facility	Transportation	Employees	Insufficient / Late Transport	Serious Injury	2	4	8	Basic OHS Trainings Given.	At least one means of transport must always be available. In this vehicle, the pharmacy bag should be kept in full. Good communication should be provided.	Employer and Employer Deputies	Throughout the operation	1	4	4

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23	Facility	General	Employees	Incorrect routing in emergency situations	Injury	2	4	8	Emergency Plans are in place. The teams were formed.	Signs must be made in accordance with Health and Safety Signs. Emergency outlets should be identified. Employees should be trained in this area. Warning and direction signs should be placed. Emergency plans should be prepared and hanged.	Human Resources	During Operations	1	4	4
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APPENDIX 2 – LAPSEKİ PROJECT SHUTTLE ROUTES AND FREQUENCIES

08:00	7 Shuttle to Plant from Başarı Hotel at Lapseki to Project Site through Biga-Lapseki Road
08:00	2 Shuttle leave from the Project Site to Orçan Apart Hotel through Biga-Lapseki Road
16:00	2 Shuttle leave from Atatürk High Street in Lapseki to Project Site through Biga-Lapseki Road
16:00	3 Shuttle leave from the Project Site to Şahinli Village through Biga-Lapseki Road
18:00	4 Shuttle leave from the Project Site to Lapseki multiple stops through Biga-Lapseki Road
24:00	2 Shuttle leave from Karamusalar Village to Project Site through village roads
24:00	2 Shuttle leave from the Project Site to Lapseki multiple stops through Biga-Lapseki Road