



Acacia
Mining Operations

ACACIA MINE OPERATIONS GÖKIRMAK COPPER MINE

Occupational Health and Safety Plan 2017

Document Number

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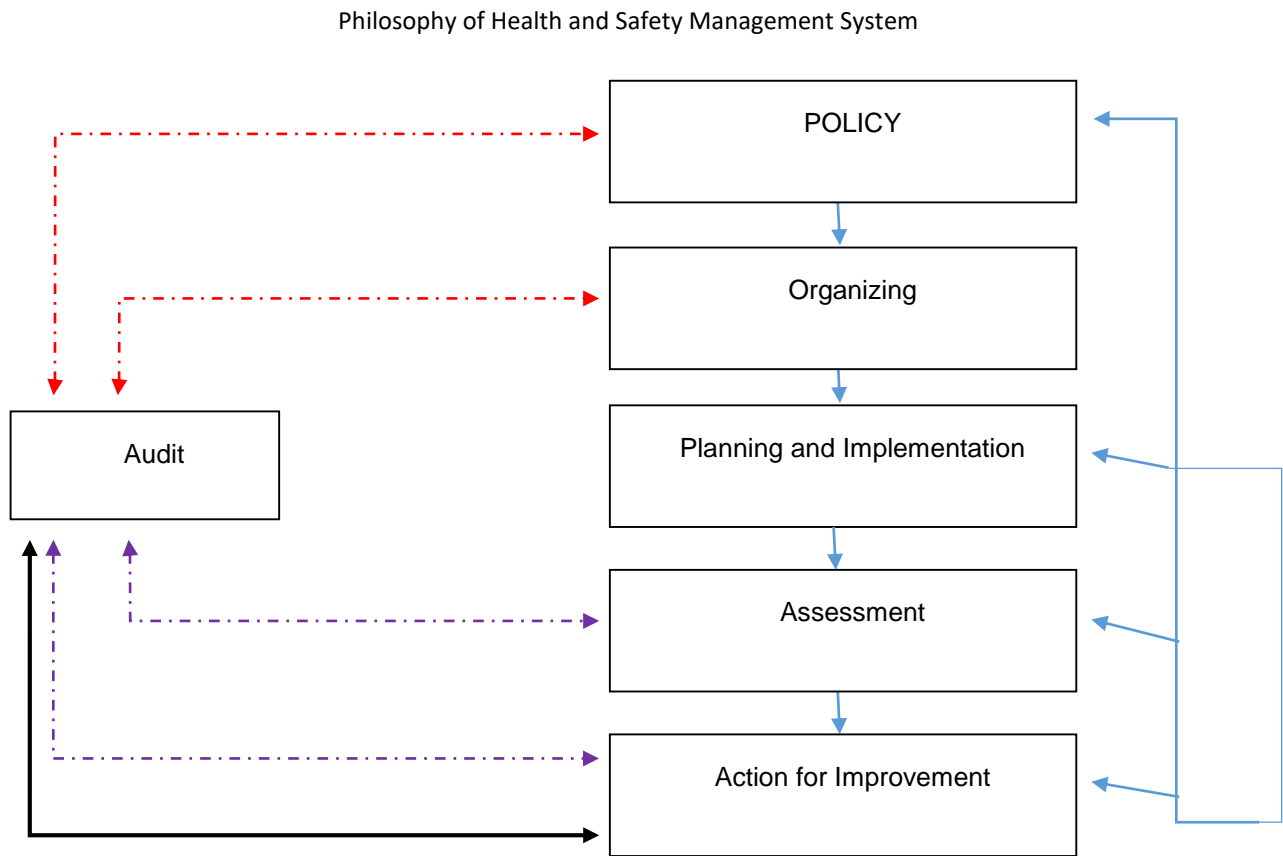
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Introduction

Acacia Mining Operations Inc. is committed to attaining excellency in healthy, safe and environment-friendly production for all of its works. It also prioritizes the health & safety and welfare of all of its workers as well as the people in its premises.

This plan sets the basics for all health & safety rules that Acacia Mining Operations Inc. departments will write and apply. The systematic approach of the plan is based on the [ILO - OSH 2001 Health and Safety Management System Rules](#) and [Law No 6331](#).



Veli Gökdere

Operation Manager

Acacia Mining Operations Inc.

1. OBJECTIVE

Acacia Mining Operations Inc. is committed to conduct its operational activities in compliance with excellent health and safety standards. The objective of this plan is to ensure a systematic approach for the purpose of maintaining an accident and incident free safety culture.

2. SCOPE

This plan, together with its annexes, applies to all Acacia Mining Operations Inc. staff, subcontractors, visitors and interns. Each new purchasing, project, joint venture or contract, which are controlled by Acacia Mining Operations Inc., shall comply with the requirements of this management plan.

3. RESPONSIBILITIES

Task	Description
Operation Manager	<ul style="list-style-type: none">• Ensure that this plan is in force,• Support continuous development of this plan in line with the views of the staff,• Adopt the Occupational Health and Safety Policy as well as all legal requirements,• Ensure that the policy is distributed to all media for display purposes,
Manager	<ul style="list-style-type: none">• Instruct each employee about the requirements of the policy through meetings on safety, health and environment,• Ensure that the policy published stays up-to-date and easily visible.
Department and Subcontractor Manager/Senior Engineer	<ul style="list-style-type: none">• Understand well the content and systematic of this plan,• Brief the team about the plan,• Instruct each employee about the requirements of the policy through meetings on occupational health and safety,• Ensure that the policy published stays up-to-date and easily visible,• Review the policy,• Update, if required, the policy and submit it to the corporate management for approval,• Review the job description of himself/herself and the team once the plan is updated.
Occupational Safety Expert / Occupational Physician	
Engineer/Shift Supervisor/Foreman	<ul style="list-style-type: none">• Learn about the content and systematic of the plan,• Ensure full compliance with the plan in verbal and written instructions,• Consider the opinions of the employees regarding health and safety,

	<ul style="list-style-type: none"> • Share ideas with the Manager/Manager for updating the plan.
Employees	<ul style="list-style-type: none"> • Having influence on others with his/her behaviours and actions, each employee is responsible from caring for his/her own and other employees' health and safety in line with the occupational health and safety training and the company's instructions in this regard, • Understand his/her responsibilities within the health & safety and welfare environment ensured by the employer. • Comply fully with the Occupational Health and Safety Plan.

- Reference that is given for any position in this plan, unless otherwise stated, will automatically include that authorized person.
- Board of Managers, Operation manager, Managers of Acacia Mining Operations Inc. are responsible for taking measures and make other do so against threats and risks in the organization. Briefly as follows:
 - a- Safe workplace - and safe entrance and exit,
 - b- Safe facility and equipment - inspection of machinery, the need for service and retrofitting will be based on the risk level.
 - c- Safe working system - must be safe under all conditions. Proper revision, planning and control provide safety of procedure,
 - d- Training and supervision for enabling competence.

4. DEFINITIONS AND ABBREVIATIONS

Hazard	An incident that may cause any type of injury or damage.
Subcontractor	A company that is contracted in writing in return for a financial reward to perform a certain task.
Process	Overall situations with which an activity is related from start to the end
Management	Board of Managers, Operation Manager, Managers, Managers and Senior Engineers working at Acacia Mining Operations Inc.
Improvement	The process of enhancing the Occupational Health and Safety Management Plan for the purpose of achieving continuous improvement in management performance.
Guideline	A written document with Operation guidance on how to realize the processes.

Instruction	A written document that prescribes the implementations as they relate to guidelines
Form	A document that includes simple descriptions for the content
Emergency	All types of abnormal, instant, undesirable, unforeseen, hazardous and/or environmentally threatening cases that require securing, correcting, controlling. Emergency is detailed in the Action Plan.
Accident	An undesirable incident that results in damage to humans and materials. Damage to environment or loss of time.
Risk	Combination of probability and severity
Competence	A combination of knowledge, experience and education
Injury	An unwanted incident which may result in a severe damage to a person who should be sent out of the field for emergency health care.
MSIF	Material Safety information Form - Data form which specifies instructions of safe use, transportation, handling and first aid for a hazardous material.
Hazardous Materials	Any amount and type of material that contains unreasonable risk for the environment and occupational health and safety when being removed from its container.
Audit	A systematic process with objectives and outputs which is used to demonstrate ways through which an organization manages the hazards and risks of occupational health and safety and to further identify to what extent does the organization meet the needs.
Audit Program	A program which is prepared within an annual plan.
Legal Requirements	Requirements of the legislation currently in force
Employee	An individual within the premises of responsibility area of Acacia Mining Operations Inc.
Employee Representative	An individual who is empowered to represent the employees in actions such as taking part in activities relating to occupational health and safety, monitoring works, sending requests to take measures and representing the employees in similar cases.
Systematic	A logic with plan and program where a step-by-step approach is adopted.

5. RECORDS

Controlled copies of this document are available at following locations. As all other copies are uncontrolled, most recent copies must be used. Up-to-date document is stored at \\ASYAFLSRV\Dökümanlar

Copies of this document are accessible at the locations specified in the following table. Unless printed from \\ASYAFLSRV\Dökümanlar, all documents are uncontrolled copies.

Record No	Location	
1	Acacia Mining Operations Inc. Main Office	Large Meeting Room, Emergency cabinet
2	Acacia Mining Operations Inc. Main Office	HSE Managers's Office, Document cabinet rank no:1

6. RELATED DOCUMENTS

Occupational Health and Safety Policy	ACACİA-8000-Pol-001
Emergency Action Plan	ACACİA-4000-Pln-002 and Appendix
Guideline on Subcontractor Management	ACACİA-4000-Yng-001

7. REFERENCES AND ANNEXES

ACACİA-4000-Pln-001-Frm-001	Occupational Safety Analysis Form
ACACİA-4000-Pln-001-Frm-002	Risk Assessment Form
ACACİA-4000-Pln-001-Frm-003	Employment Start Form
ACACİA-4000-Pln-001-Frm-004	Training Participation Form
ACACİA-4000-Pln-001-Frm-005	Hazard & Nonconformity & Undesirable Incident Notification Form
ACACİA-4000-Pln-001-Frm-006	Accident & Incident Notification Form
ACACİA-4000-Pln-001-Frm-007	Personal Protective Equipment Evaluation Form
ACACİA-4000-Pln-001-Frm-008	Safety Alert Form
ACACİA-4000-Pln-001-Tbl-001	Occupational Health and Safety - Monitoring and Evaluation Table

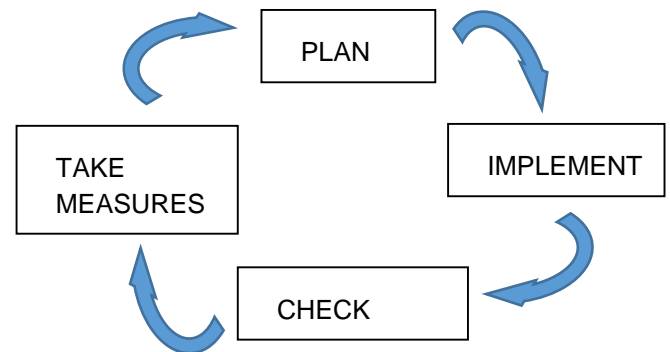
8. METHOD

8.1. MAIN COMPONENTS OF HEALTH AND SAFETY MANAGEMENT SYSTEM

With a view to become a responsive, responsible and respectful company, Acacia Mining Operations Inc. has targeted to establish a health and safety system with high standards and with full compliance to ILO-OSH 2001 Health and Safety Management System and Law No 6331 on Occupational Health and Safety.

The main component of the system follows the steps below:

- **PLAN** your work.
- **IMPLEMENT** it.
- **CHECK** that everything is on track with what you do.
- **TAKE MEASURES** if what you do is not on track.



Main components of the system are: Policy, Organization, Planning and Implementation, Evaluation, Actions and Auditing for Improvement. The system will evolve by time to ensure continuous improvement.

8.1.1. Commitment and Support of the Management

The management of Acacia Mining Operations Inc. is aware of its responsibility to support the implementation and sustainability of the system. The management acknowledges and supports the Occupational Health and Safety Management Plan.

The commitment and the support of the management includes;

- Promoting the implementation of the Occupational Health and Safety Management Plan and safeguarding the plan,
- Making sure that the physical as well as organizational resources are allocated that are required for the implementation of the Occupational Health and Safety Management Plan.
- Writing, publishing and implementing, in the field, the Occupational Health and Safety Policy,
- Identifying measurable health & safety objectives and targets for the departments on an annual basis,
- Achieving its own targets for the purpose of achieving health and safety targets of Acacia Mining Operations Inc.
- Contributing to the efforts of updating the Occupational Health and Safety Plan at least one time in a year or when required,
- Ensuring that the opinions of the employees are integrated to the system.

Inviting “employees’ representative” to the occupational safety meetings to reflect the employee opinions. The management will take note of and evaluate the verbal and written statements.

8.2. POLICY

8.2.1. Objective and Importance

The objective of the Occupational Health and Safety Policy of Acacia Mining Operations Inc. is to set the basics for the health & safety system.

Written by the Operation Manager and being one of the major building blocks, our OHS Policy is important for the fact that it identifies our targets and responsibilities and stands for the written commitments given to our employees. What is really more important is to enable all our employees to understand this written policy.

8.2.2. Basic Characteristic and the Content

A clear and precise definition on what, who and how things are to be done including arrangements is included within the content and basic characteristics of the Occupational Health and Safety policy through the management’s statement of intent.

8.2.3. Revising

The Health and Safety policy shall be reviewed when change take place for the following items;

- Main personnel
- Management structure
- Ownership
- Processes
- Technology
- Legislation
- Major accidents & incidents
- Sanctions
- Post-auditing
- After receiving the opinions of the employees
- Being outdated
- Recommendations of insurance company... etc.

8.2.4. Policy

Acacia Mining Operations Inc. is mining company which is committed to manage, in a safe and responsible manner, all aspects within its activities as it stays loyal to the Occupational Health, Safety and Environment Policy of Acacia Mining Inc. Our company further commits itself to safeguarding the health and welfare of the communities it works within.

As Acacia Mining Operations Inc., while conducting our activities, we make sure that we will;

Secure a continuously healthy and safe workplace for our employees, subcontractors and all our visitors,

- ❖ Meet to our responsibilities regarding the protection of health, safety and welfare of our employees as well as others who might be effected from our activities,
- ❖ Comply with the legislation on occupational health and safety and operational standards that are identified by the management.
- ❖ Review the required policies for the purposes of continuously implementing the developments in occupational health and safety management system and protecting the applicable operational standards,
- ❖ Support an understanding where the risks of occupational health and safety are assessed and managed in all levels,
- ❖ Provide all the equipment and systems that are required for training and for securing a healthy and safe working conditions in which the employees are conducting activities with high responsibility and coordination,
- ❖ Develop and implement effective preparedness and response systems against emergencies,
- ❖ Ensure the sustainability of sensible, responsible and respectful employees in our establishment.

8.3. ORGANIZING

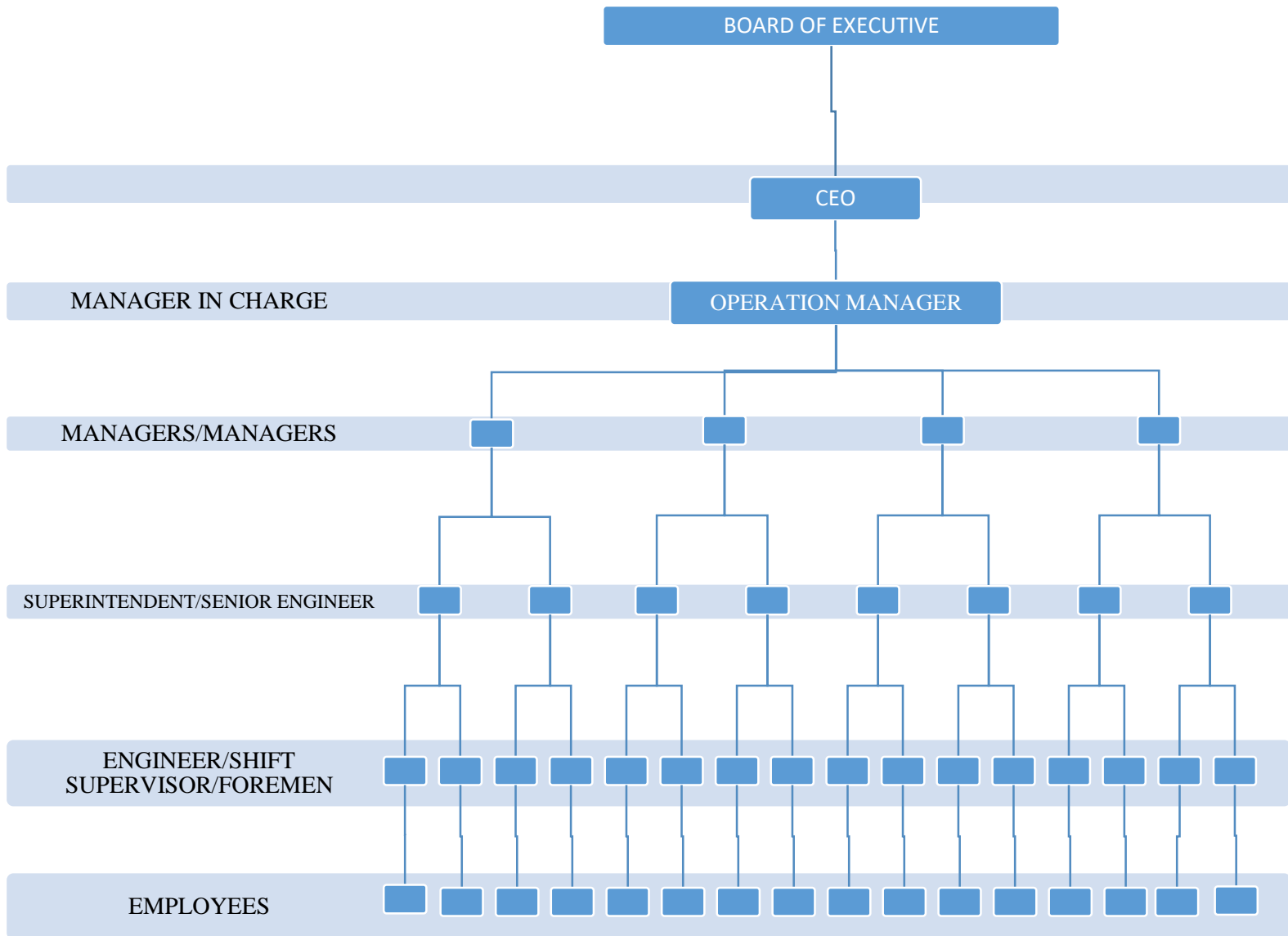
8.3.1. Objective and Importance

Acacia Mining Operations Inc. aims at creating safe working environments and adopting the responsibility to ensure that the management does not allow any sort of health risks. Responsibility is clarified with ILO Agreement C155 and ILO Recommendations R164. Additionally, responsibilities are defined in a clear and precise way in the Occupational Health and Safety Management Plan.

8.3.2. Roles and Responsibilities in Organizational Health and Safety

Roles and responsibilities are defined in the following table for making sure that health and safety management is implemented in systematic way without any trouble.

Organization Scheme



Task	Description
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Board of Managers & CEO	<ul style="list-style-type: none"> • Adopt Health and Safety plan and make sure it is implemented in each stage, • Provide financial resources to the Management for Health and Safety needs, • Support the use of products and equipments that comply with standards, the concept of safe workplace and equipment.
Operation Manager	<ul style="list-style-type: none"> • Make sure that risk analyses and Occupational Safety Analysis processes are completed for certain tasks across the works of departments, • Support the Department Managers to reduce the risk levels to acceptable levels for areas and activities including “very high risk” and “high risk” in the risk records. • Promote the compliance of the management for the roles and responsibilities included in the plan.
Managers/Managers	<ul style="list-style-type: none"> • Ensure a working environment that is in compliance with this plan across all activities, • Provide information to the employees working in his/her department about this plan, • Comply with this plan while creating written guidelines, instructions and forms. • Report when there a non-compliant situation with the plan arises in the premises of responsibility, • Prepare the job descriptions of the employees and specify their responsibilities in accordance with the plan, • Understand very well the systematics of this plan, • Support the subcontractor companies in their effort to fully comply with this plan, • Ensure that risk analyses for the works in his/her area of responsibility are completed, • Allocate resources, time and competent people for the performing risk analysis, • Make sure that risk analyses are updated when an accident-incidents happens in the work area or a change takes places in the machinery & equipment. • Make sure that people commissioned for risk assessment process are trained in risk assessment methods and risk control. • Take additional measures for works that are highlighted to be in red level in the risk analysis form until required controls and measures are secured. Stop the work when this is not possible. • Review documents such as guidelines, instructions and risk analysis relating to their areas of responsibility and arrange these documents if necessary, • Make sure that necessary training is organised for the purpose of transferring the risk assessment, guidelines and instructions to the employees.

Department and Subcontractor Senior Engineer/Süperintendent	<ul style="list-style-type: none"> • Promote hazard card notice system to ensure that employee's opinions are taken. • Participate in risk assessment teams and secure applicable environment for risk assessments, • Manage the activities within their areas according to the risk assessments, • Make arrangements in the areas of responsibility and prepare guidelines and instructions within the arrangements.
Engineer/Shift Supervisor/Foremen	<ul style="list-style-type: none"> • Learn about the content and systematic of the plan, • Ensure full compliance with the plan in verbal and written instructions, • Consider the opinions of the employees regarding health and safety, • Share ideas with the Manager/Manager for updating the plan.
Employees	<ul style="list-style-type: none"> • Having influence on others with his/her behaviours and actions, each employee is responsible from caring for his/her own and other employees' health and safety in line with the occupational health and safety training and the company's instructions in this regard, • Understand his/her responsibilities within the health & safety and welfare environment ensured by the employer. • Comply fully with the Occupational Health and Safety Plan.
Procurement Unit / Head	<ul style="list-style-type: none"> • In addition to the roles and responsibilities above, • Comply fully with the legal requirements in the purchasing of any item, • Make sure that the material safety data sheet (MSDS) for hazardous materials to be purchased are approved by the Department of HSE. Do not buy chemical materials unless they are approved by the HSE Department. • Prepare guidelines and instructions that include Health and Safety topics.

8.3.3. The Concept and Importance of Health and Safety Culture

Occupational health and safety culture means that employees are well aware of their responsibilities within the context of a situation where their safe work and opinion as well as their statistics are traceable and measureable. Having targeted to establish a health and safety culture, Acacia Mining Operations Inc. has, in principle, aims to improve the level of its own and its subcontractors' awareness and culture. Subcontractors will full comply with this plan and provide necessary trainings to their employees. This plan will contribute to create a sustainable and positive culture. Managers and managers will focus on safety applications and ensure the awareness of their team members.

8.4. PLANNING

8.4.1. Objective and Importance

This is systematically the third step in the planning stage of the implementation (ILO-OHS 2001-3.step). What ? Method ? When? should be the main concern of identification. Acacia Mining Operations Inc. will effectively implement the planning stage across all of its activities. Targets should be identified at this stage. Targets should be SMART.

SMART TARGETS

(S)	Specific	-	→ clearly identified and precise,
(M)	Measurable	-	→ target oriented and quantitative,
(A)	Achievable	-	→ possible to put in practice,
(R)	Reasonable	-	→ enough time and resource is allocated,
(T)	Time-bound	-	→ practicable by the end of time.

Targets will be identified in a hierarchy from top to bottom. Some items to be considered while identifying targets;

- a- Hazards and risks. Targets aim to control the hazards and risks within Acacia Mining Operations Inc.
- b- Technological options. These are for adopting and making use of new technology.
- c- Financial/operational. Production targets and health & safety targets will be combined.
- d- Opinions of the employees as well as the shareholders and targets will be correlated.

8.4.2. Principle and Importance of Risk Assessment

A workplace should be arranged in a reasonable and practicable way in a view to avoid any risks. The main principle while making the risk assessment is to split any activity into several steps and assess each work step individually. Risk assessment for each activity within the premises of the workplace shall be performed by the supervisor of that activity and his team.

5 basic steps to risk assessment;

1. Identify the hazard
2. Identify the people in difficult situation and the cause
3. Assess the risk and take measures
4. Records important findings
5. Review and update if required.

8.4.3. Identification of Hazards

Hazards may come out during any kind of work. Hazards may be caused by maintenance, fixing, installation of equipment, high works, hot works, humans and other living creatures.

The first of 5 main steps of risk assessment is the identification of hazards. While identifying the hazards within the premises of the company, information should be collected for the following activities including but not limited to:

- a) Workplace building and its extensions.
- b) Activities, works and processes performed in the workplace.
- c) Work equipment.
- d) Materials used.
- e) Processes relating to wastes and excess materials.
- f) Organization, hierarchical structure, tasks, powers and responsibilities
- g) Experience and opinions of the employees.
- h) Work permits in compliance with the relative legislation before the starting the employment.
- i) Details of the employees such as education, age, gender etc. and health surveillance records.
- ı) Status of female workers and the groups that require specific policies such as young, elder, disabled, pregnant or nursing mother etc.
- i) Inspection outcomes of the workplace.
- j) Records of occupational disease.
- k) Records of work accidents.
- l) Records of incidents that do not cause any injuries or deaths but result in a damage to the workplace or to the equipments in the workplace.
- m) Records of nearly missed incidents
- n) Material safety information forms.
- o) Results of ambient and personal exposure levels.
- ö) Past risk assessments if applicable.
- p) Emergency plans.
- r) Specific documentation such as health and safety plan and protection from explosions that have to prepared for certain workplaces.

Relative legislation

Manufacturer's and supplier's guides

Classification of the hazards are briefly described in the table below. The table is for reference only.

Table of hazard classifications

Physical	Arching, spark, electric, tripping, falling from height, hot/cold surfaces and unshielded equipment.. etc.		
Chemical	Flammable and combustible, toxic, chemical reaction and carcinogenic etc.		
Biologic	Bacteria, virus (HIV etc.), dust, particulates, insecticide.. etc.		
Ergonomic	Insufficient design, insufficient rest, leaning, bending and repetitive moves etc.		
Health	Fatigue, smoke, noise, insufficient oxygen, chemical vapour etc.		
Environmental	Chemical spill, proliferation, waste water, dust etc.		

The hazards combined are assessed in compliance with the up-to-date health and safety law. People that will be effected are identified during the assessment. During this identification, below items have to be considered in addition to who and how shall be effected from these.

- Hazards that may come out due to the location of the company.
- Hazards which may result from the improper location selected for workplace premises and annexes on the designated area or additions not specified in the plan.
- Hazards which may result from the construction of workplace premises and annexes, building method, and building materials selected.

- c) Hazards which may result from working procedures, shifts, teamwork, organization, supervision system, hierarchical order, and visitors and other persons who are not employed at the workplace during all kinds of activities to be carried out at the workplace, including maintenance and repair works.
- d) Hazards which may occur because of the performance of the works, production techniques, and materials, machinery and equipment, tools, and supplies used and if they have not been designed or used in a manner consistent with the physical characteristics of workers.
- e) Hazards resulting from the components of electrical installation such as high current, lighting, lightning arresters, and grounding, and equipment used for ventilation, protection against atmospheric and environmental conditions, drainage, treatment, and firefighting and similar ancillary installation and equipment.
- f) Hazards which may result from processing, using, transporting, storing or destroying highly inflammable or explosive materials.
- g) Hazards which may result from hygienic conditions on the work site and personal hygiene of workers.
- ğ) Hazards which may result from workers' use of access roads within the workplace.
- h) Hazards which may occur if workers have not been adequately trained in or informed about occupational health and safety or they have not been issued appropriate instructions or no work permit has been obtained under the applicable directive.

8.4.4. Identification of People Under Risk

Some risk groups should be given special consideration during the identification of persons under risk.

Employees who we could categorize as a special risk group include those who work alone or are pregnant, old, disabled, or young.

It should be considered that young employees may be inexperienced and ambitious persons with a low risk perception and prone to external influence.

It should be borne in mind that pregnant workers can be negatively affected during night shifts and manual handling and in places where chemicals are used or exposed to high radiation and they should be included in the special risk group during that period.

Special job descriptions of old-aged workers should be developed for old-aged workers and their fitness for work should be assessed because their reflexes and selective perceptions might have been diminished.

The need for providing appropriate access roads, jobs, and ergonomic settings for disabled employees should be definitely given special consideration.

Interns may be included in this group. Persons who may be 'curious' during the learning process may be exposed to risks and the training period should be completed with regard to scheduled and supervised works.

8.4.5. Risk Assessment Team

Risk assessment is carried out by a team set up by the employer. The risk assessment team consists of the following persons:

- c) Employer or its representative. Managers and managers of departments concerned.
 - b) Work safety and Occupational Physicians providing health and safety services at the workplace.
 - c) Employees' representatives at the workplace.
 - ç) Support staff at the workplace.
 - d) Employees who have been elected as the representatives of all units at the workplace and familiar with existing or potential sources of hazards and risks as well as works being carried out.
- (2) The employer may receive services from persons and organizations outside of the workplace in order to provide support for the team if required.
- (3) Risk assessment may be coordinated by the employer or any member of the team designated by the employer.
- (4) The employer will furnish the person or persons tasked with risk assessment with all equipment, tools, time, and place they may need in order to perform their duties and may not restrict their rights and authorizations because of such work.
- (5) Person(s) assigned to risk assessment will safeguard information and documents provided by the employer.

8.4.6. Risk Assessment and Occupational Safety Analyses

The frequency of risks which may result from each identified hazard and persons and property which may be harmed by such risks, how they may be harmed, and their severity by taking account of each hazard. The effect of existing control precautions should be taken into consideration while making the determination. Risks identified in light of information and data gathered will be analyzed by using one or more methods selected based on factors such as particulars related to the enterprise's operations, the characteristics of hazards and risks at the workplace, and restrictions at the workplace or national and international standards. If there are departments where different types of works are performed at the workplace, actions specified in the first and second paragraphs will be repeated for each department. If the analysis is done for individual departments, it will be concluded in an integrated manner by taking account of interactions between those departments. Analyzed risks will be ranked, starting with the one at the highest risk level based on the importance and size of their effects and documented in order to decide control precautions. A safety analysis is conducted for each job without instructions. For

instance, if no instructions are provided for tea brewery, job safety analysis has to be performed. Job safety analysis is the risk assessment through which the job is managed in steps and in a plan. It is different than risk assessment in practice. For those jobs for which a risk assessment exist but no instructions given, a job safety analysis is still performed. Job safety analysis form 'ACACiA-4000-Pln-001-Form-001 Job Safety Analysis Form' shall be used.

STEPS OF RISK CONTROL

(1) These steps will be implemented while controlling the risks.

a) Planning: A planning is made for controlling the risks which were prioritized according to their level of importance as a result of an analysis.

b) Comparison of risk control measures: The following steps will be taken in order to eliminate the risk or, if it is not possible, to bring it to an acceptable level:

1) Elimination of the hazard or its sources.

2) To replace the hazard with another one which is not hazardous or is less hazardous.

3) To fight against risks at their sources.

c) to implement risk control measures: Plans comprising work and action steps of agreed measures, individual or department who will take such action, responsible individual or department, dates of commencement and completion, and similar details will be drawn up. These plans will be implemented by the employer.

d) Monitoring implementation: Implementation steps of drafted plans will be regularly monitored and supervised and necessary corrective and preventive actions were taken after determining shortcomings.

(2) When risk control steps are taken, due consideration should be given to according priority to collective protection precautions and personal protection measures and ensuring that actions to be taken will not lead to new risks.

(3) A new risk level assessment will be done after the control measures for the identified risk are implemented. If the new level is above the acceptable risk level, steps in this clause will be repeated.

8.4.7. Revising

The risk assessment will be updated in whole or in part by considering that new risks which may arise in the following circumstances affect the workplace or a part of it:

- a) If the workplace is moved to another address or the buildings are modified.
- b) There has been a change in the technology, materials, and equipment used at the workplace.
- c) Changes in the production method.
- d) Occurrence of a work accident, occupational disease or near miss.
- e) An amendment to regulations applicable to limit values set for the work environment.
- f) If it is considered based on the outcome of a medical screening or measurements at the workplace.
- g) A new threat which originates from a source outside of the workplace and may affect it.

8.4.8. Risk Assessment Form

Assessments shall be made according to “ACACiA-4000-Pln-001-Frm-002 Risk Assessment Form”

8.4.9. Risk Assessment Record

Risk assessments made shall be managed in accordance with ‘ACACiA-4000-Pln-001-Tbl-001 Occupational Health and Safety Monitoring and Assessment Table’

Each department is entitled to prepare and update the risk assessments which fall into its area of responsibility. Risk assessments shall be revised;

After accidents or nearly missed incidents, if required,

When new risks are identified,

When processes are changed and

As new activities start.

The Occupational Health and Safety Unit may propose that departments hold meetings for a routine review or update of their risk assessments if considered necessary. Risk records should be reviewed and updated at least annually.

The Occupational Health and Safety should be informed during risk assessments and updates and records should be kept properly and fully.

8.4.10. Emergency Situations

A detailed explanation about an emergency, preparations for an emergency, emergency response teams, and their training will be managed under ACACiA-4000-Pln-002 Emergency Action Plan.

8.4.11. Work Authorisation Systems

Work authorisation systems have been designed for some special works and they represent form and approval mechanisms ensuring that works are completed safely and property. Work authorisation systems to be implemented on the sites of Acacia Mining Operations Inc.. are subject to constant improvement and revision. Work authorisation systems: They include authorisation for hot work, authorisation for working in closed spaces, authorisation for working on a scaffold, etc.

AUTHORISATION FOR HOT WORK

Hot work: Any work which may be a source of heat and combustion. Hot work authorisation system is managed under its own directive and work. Examples, welding, cutting with oxygen gas, grinding, utilisation of electric heavy work tools, cutting with spiral, grinding, etc.

Hot Work Authorisation will be issued for all operations listed above. Exceptional places are those which have been designated as areas which do not require hot work authorisation.

No hot work will be performed unless all related documentation has been provided and the following actions have been taken:

- A supervisor of Acacia Mining Operations Inc., who is responsible for the hot work area will ensure that all employees assigned to such work have duly signed and approve the authorisation.
- Screens and materials preventing people from accessing or being exposed to the hot work area will be installed.
- A copy of the documentation will be kept at the hot work area.

Hot work authorisation system will be managed by its own regulations and forms.

EXCAVATION AUTHORISATION

The purpose of this authorisation is to provide clear, definite, appropriate, and consistent information are provided for the successful management of excavation areas and completion of related works and to ensure that the workers and contractors of Acacia Mining Operations Inc.. work in a healthy and safe manner. Excavation risks include aerial cables, underground electricity, water lines, etc.

Excavation works comprise the transportation or displacement of soil, rock, open quarry, installation area or other surface materials by using tools, equipment or explosives and works comprising excavation, ditch opening, and formation of faces.

Excavation works to be carried out in the mining area may lead to many risks such as lateral loads, materials stacked very close to the excavation site, atmospheric conditions, surface cracks and fractures, vibration of equipment, humidity ratio, and utilities.

The excavation authorisation will be applied to any excavation to be carried out outside of Mine Technical Office Project Drawings for opencast mining. Hot work authorisation system will be managed by its own regulations and forms.

CONFINED SPACE

The purpose of this authorisation is to provide clear, definite, appropriate, and consistent information are provided for the successful management of confined spaces and completion of works in closed spaces and to ensure that the workers and contractors of Acacia Mining Operations Inc. who have been assigned control tasks or works in a confined space in a healthy and safe manner. Risks in a closed space include inflammation, landslide, being crushed, suffocation, fall of mill lining, etc.

Authorisation system for working in a closed space will be managed by its own regulations and forms. A brief definition of a closed space: Any space 1) which has not been designed for manual works to be carried out inside, 2 - which has limited natural ventilation, 3- without any entrance or exit point designed for human access is categorised as a closed space. An authorisation for working in a closed space is managed by its own regulations and forms.

AUTHORISATION FOR WORKING ON A SCAFFOLD

This authorisation is applicable to each scaffold in order to ensure that a standard scaffold in a safe manner and scaffolds are supervised in terms of safety and the ability of persons who will work on a scaffold to work at height. An authorisation for working on a scaffold is managed by its own regulations and forms. Standard scaffolds, safety belts, and other equipment used must comply with EN TSE as a minimum. It is prohibited to install a scaffold which is not in compliance with the requirements and to bring non-compliant scaffold materials to the site. An authorisation for working on a scaffold is managed by its own regulations and forms.

8.5. IMPLEMENTATION

8.5.1. Objective and Importance

Ensuring the safety and health of its employees is one of fundamental principles and goals of Acacia Mining Operations Inc. Precautions aimed at preventing work accidents and occupational diseases must be implemented in an integrated manner. As specified in the section on regulations, the employer and/or its representatives are required to ensure the safety and health of its employees while employees are required to ensure that their and other employees' health and safety are not put at jeopardy based on training that they have received on work-related health and safety and the employer's related instructions. These obligations should be defined by taking account of the organisational chart for the workplace.

Supervisors who act as the employer's representative and are involved in the management of the work and workplace according to the organisational chart will be treated as an employer for the purposes of the application of the Law on Occupational Health and Safety because they are the employer's representative.

Each supervisor will delegate OHS responsibilities to first-line supervisors who report to him or her to a certain extent and may be directly or indirectly affected by legal consequences which may occur if they neglect their responsibilities defined in detail for all positions beginning with the lowest position. Supervisors will have the primary responsibility for explaining

this phenomenon to their subordinates and to ensure that they adopt it because they are deemed to be the employer's representative.

Department Managers report to the Operation Manager; Managers/managers, supervisors, specialists, and senior engineers assigned to each department report to their own immediate supervisors or directly to department Managers; and shift supervisors and other supervisors at lower levels report to their immediate supervisors regarding OHS issues.

All employees in "SUPERVISOR" positions have primary responsibility for ensuring that company and contractor workers reporting to them in respective areas of responsibility work in a healthy and safe manner and preventing them from deviating from established OHS rules and standards and avoiding unsafe situations and behavior.

The following responsibilities have been defined under applicable legislation and the policies of Acacia Mining Operations.

8.5.1.1. Operation Manager;

1. To ensure that OHS policies and directives are devised and written and verbal occupational health and safety directives are known at each level;
2. To ensure that standard equipment, vehicles, and materials required for ensuring occupational health and safety are provided;
3. To ensure compliance with occupational health and safety precautions and to make sure that workers are informed about occupational risks they face, precautions required to be taken, and their legal rights and obligations, and they receive required training occupational health and safety.
4. To provide funds and resources required for occupational health and safety actions;
5. To ensure that decisions made by the OHS Board in accordance with applicable legislation are implemented;
6. To supervise Department Managers while they fulfil OHS responsibilities;
7. To ensure that an approved log is kept at the workplace and to assess findings and recommendations entered by the occupational safety specialist and Occupational Physician in the approved log and to ensure that necessary actions are taken accordingly;
8. To regularly assess OHS performance and to ensure that improvements are made

8.5.1.2. Department Managers/Managers;

They report to Operation Manager in OHS issues. The responsibilities applicable to Department Managers are also applicable for all Acacia Mining Operations Inc. employees working under them as well as the contractor's employees.

1. They are responsible from implementing, coordinating and overseeing all Occupational Health and Safety plans, policies, guidelines, rules and programs that are created either by the OHS Department or the OHS Committee as approved by the Operation Manager. Their responsibilities further include:
2. Complying with and overseeing the compliance to the OHS instructions given by the Operation Manager,

3. Leading and being an exemplary figure in a view to improve the OHS culture and awareness of the employees,
4. In addition to complying with OHS policies, guidelines and rules, assessing and preventing the risks in their areas of responsibility, responding the risks at source and making sure that necessary measures are taken to minimize the risks.
5. Making sure that necessary guidelines and rules are created and implemented for specific jobs in Acacia Mining Operations Inc. that they are responsible for and contractors' areas of work,
6. Ensuring that all employees including the supervisors are trained in safe working guidelines and rules.
7. Making sure that all occupational health and safety related documents are properly stored,
8. To conduct regular inspections in their respective areas of responsibility and to identify risky situations, breaches of law, and situations not in conformity with the policy and directives of Acacia Mining Operations Inc. and to take or arrange for taking related corrective/improving actions;
9. To ensure that machinery, equipment, tools, and materials required for the safe performance of works in their areas of responsibility are provided and used;
10. To review accident/incident reports and to ensure that corrective actions are taken in order to prevent similar accidents/incidents;
11. To take an action to correct behavior commensurate with the related breach when they determine that the employees of Acacia Mining Operations Inc. and contractors in their areas of responsibility have violated an OHS regulation; and
12. To coordinate communication on OHS and to ensure that all required information is communicated to its subordinates and contractor's workers.

8.5.1.3. Department and Subcontractor Manager/Manager/Senior Engineer;

They report to the Department Manager or immediate supervisors regarding OHS issues. Their obligations cover all employees of Acacia Mining Operations Inc. and contractor employees who report to them.

1. They are responsible from implementing, coordinating and overseeing all Occupational Health and Safety plans, policies, guidelines, rules and programs that are created either by the OHS Department or the OHS Committee as approved by the Operation Manager.
2. To comply and ensure compliance with instructions issued by the Department Manager or immediate supervisors on OHS issues.
3. Leading and being an exemplary figure in a view to improve the OHS culture and awareness of the employees,
4. In addition to complying with OHS policies, guidelines and rules, assessing and preventing the risks in their areas of responsibility, responding the risks at source and making sure that necessary measures are taken to minimize the risks.
5. Making sure that necessary guidelines and rules are created and implemented for specific jobs in Acacia Mining Operations Inc. that they are responsible for and contractors' areas of work,
6. Ensuring that all employees including the supervisors are trained in safe working guidelines and rules.
7. Making sure that all occupational health and safety related documents are properly stored,

8. To conduct regular inspections in their respective areas of responsibility and to identify risky situations, breaches of law, and situations not in conformity with the policy and directives of Acacia Mining Operations Inc. and to take or arrange for taking related corrective/improving actions;
9. To ensure that machinery, equipment, tools, and materials required for the safe performance of works in their areas of responsibility are provided and used;
10. To plan and deliver OHS training in coordination with OSH Department when considered necessary.
11. To take part in the accident/incident investigation team and to ensure that they are investigated.
12. To review accident/incident reports and to ensure that corrective actions are taken in order to prevent similar accidents/incidents;
13. To coordinate communication on OHS and to ensure that all required information is communicated to its subordinates and contractor's workers.

8.5.1.4. Engineer / Shift Supervisor / Foremen;

They report to the Department Manager or immediate supervisors regarding OHS issues. Their obligations cover all employees of Acacia Mining Operations Inc. and contractor employees who report to them.

1. To implement and ensure the implementation of OHS policies, directives, rules and programs.
2. To comply and ensure compliance with instructions issued by the Department Manager or immediate supervisors on OHS issues.
3. Leading and being an exemplary figure in a view to improve the OHS culture and awareness of the employees,
4. In addition to complying with OHS policies, guidelines and rules, assessing and preventing the risks in their areas of responsibility, responding the risks at source and making sure that necessary measures are taken to minimize the risks.
5. To do work safety analysis and to verify that works carried out comply with such work safety analyses done.
6. Ensuring that all employees including the supervisors are trained in safe working guidelines and rules.
7. Making sure that all occupational health and safety related documents are properly stored,
8. To conduct regular inspections in their respective areas of responsibility and to identify risky situations, breaches of law, and situations not in conformity with the policy and directives of Acacia Mining Operations Inc. and to take or arrange for taking related corrective/improving actions;
9. To ensure that machinery, equipment, tools, and materials in their areas of responsibility are used in a safe manner.
10. To plan and deliver OHS training in coordination with the immediate supervisor.
11. To investigate all accidents and incidents which have occurred in their respective areas of responsibility and to make suggestions about how such accidents/incidents can be avoided.
12. To ensure that risks related to any work are assessed and precautions commensurate with such risks are taken before the commencement of the work.
13. To promptly stop the work when there is any unsafe behavior or situation and to ensure that corrective actions are taken.

14. To ensure that tools, equipment, and vehicles are used and operated only by authorized persons who have sufficient training and skills.
15. To ensure that vehicles, equipment, and tools are in good condition and well maintained, and
16. To ensure that all required OHS information is communicated to its subordinates and contractor's workers.

8.5.1.5. Employees

1. To comply with all precautions taken by the employer;
2. To comply with OHSM plans, policies, directives, and rules of Acacia Mining Operations Inc. and all verbal and written instructions issued by their supervisors;
3. To warn their colleagues when they observe that they perform works in an unsafe manner in order to ensure that they work safely and, if their warnings go unheeded, to report it to their immediate supervisor;
4. To promptly report any risk in the work setting to their immediate supervisors in order to ensure that the risk is eliminated or at least minimized;
5. To promptly report any serious and immediate risk in terms of health and safety in machinery, devices, tools, plants, and buildings at the workplace or any omission in protection measures to the employer (immediate supervisor) or employees' representative;
6. To promptly report any accident/incident (including near misses) which they have experienced or witnessed to their immediate supervisors;
7. To be involved in and cooperate with regard to OHS issues;
8. To work at the workplace in a manner not putting his and others' safety at risk;
9. To use tools, equipment, and all vehicles at the workplace in a careful and prudent manner and to prevent any damage to them;
10. To use machinery, devices, tools, hazardous substances, handling equipment, and other production apparatus in accordance with rules and to use their safety equipment properly and not to remove or replace them arbitrarily;
11. To inform their supervisors when any work which they are incapable of performing or put their or others' safety at risk and to ensure that necessary precautions are taken or risks are eliminated;
12. To regularly read information on OHS boards and to work by taking account of specified precautions and warnings issued to them;
13. Using the personal protective equipment given to them properly and to protect them,
14. To exercise maximum care in order to ensure that their and other persons' health and safety are not negatively affected by their behavior and faults.
15. To cooperate with the employer and employees' representative in order to rectify violations and shortcomings discovered by inspection authorities in order to ensure health and safety at the workplace; and
16. To cooperate with the employer and employees' representative in order to ensure occupational health and safety in their area of responsibility.

8.5.1.6. Employees of the Subcontractor;

The obligations of subcontractor employees and representatives in terms of occupational health and safety are similar to those defined above for different organizational levels within Acacia Mining Operations Inc.

Subcontractors will draw up their organizational charts and define responsibilities assigned to supervisors and employees in a fashion similar to those given above.

8.5.1.7. Occupational safety specialists

The roles and responsibilities of occupational safety specialists are defined in the Regulation on the Roles, Responsibilities and Training of occupational safety specialists as follows:

Responsibilities of occupational safety specialist

a) Guidance

- 1) To submit proposals to the employer in order to ensure that the planning, organization, and performance of works, including design; condition, maintenance, and selection of machinery and other equipment and materials used in respect of works to be performed at the workplace and modifications to be made; selection, supply, storage, and testing of personal protective equipment in accordance with regulations on occupational health and safety and Operation rules on occupational safety.
- 2) To inform the employer of actions required to be taken with regard to occupational health and safety in writing.
- 3) To investigate the causes of work accidents and occupational diseases witnessed at the work place and to submit proposals to the employer about actions to be taken in order to prevent them.
- 4) To investigate the causes of incidents which have occurred at the workplace without causing death or injury, but could harm employees, equipment or the workplace and to submit proposals to the employer.

b) Risk assessment;

- 1) To take part in risk assessments concerning occupational health and safety and their implementation and to submit proposals to the employer regarding health and safety precautions that have to be taken based on the risk assessment and to follow up on them.

c) Supervision of work environment

- 1) To oversee the work environment and to plan and oversee the implementation of periodic maintenance, inspections, and measurements at the workplace under regulations on occupational health and safety.
- 2) To take part in efforts aimed at preventing accidents, fire, or explosions at the workplace; to submit proposals to the employer in that regard; to monitor their implementation; to take part in the development of emergency plans regarding natural disasters, accidents, fire or explosion; to oversee and verify that periodic training and drills regarding those issues are conducted and actions are taken in line with the emergency plan.

ç) Training, briefing and recording;

- 1) To plan employee training in occupational health and safety in accordance with applicable regulations and to submit such plans to the employer for approval and to implement or oversee such plans.
- 2) To draw up an annual assessment report containing the findings of occupational health and safety processes and supervision of work environment in collaboration with the Occupational Physician in accordance with the sample provided in applicable regulations.
- 3) To organize dissemination of information to employees and to submit it to the employer for approval and to oversee its implementation.
- 4) To draw up instructions on health and safety at related parts of works and work authorization directives and to submit them to the employer for approval and to oversee their implementation.
- 5) To inform OHS SECRETARY about issues related to occupational health and safety which may be designated by the Ministry.

d) Cooperation with other units;

- 1) To make an assessment concerning work accidents and occupational diseases in collaboration with the Occupational Physician; to conduct an investigation and research regarding the prevention of risky incident and to draw up a preventive action plan and to oversee their implementation.
- 2) To draw up an annual work plan containing activities to be carried out in the following year in respect of occupational health and safety in collaboration with the Occupational Physician.
- 3) To work in collaboration with the occupational health and safety board, if any, which they have joined.
- 4) To provide support for employees' representatives and support staff and to cooperate with those persons.

Responsibilities of Occupational Safety Specialist

(1) The responsibilities of the occupational safety specialist are as follows:

- a) To seek the employer's approval for revising occupational safety analyses, instructions, and assessments issued in respect of works undertaken by subcontractors and Acacia Mining Operations Inc.
- b) If the vital risk which he has discovered at the workplace is serious and unavoidable and requires an urgent response, to apply to the employer for the suspension of the works.
- c) To conduct investigations and researches in all sections of the workplace as part of its responsibilities, to access required information and documents, and to interview employees.
- ç) To cooperate with appropriate agencies and organizations regarding issues pertaining to his responsibilities after informing the employer and in accordance with the internal directives of the workplace.

Responsibilities of Occupational Safety Specialist

(1) When performing their duties laid down in this plan, occupational safety specialists should not interrupt the ordinary flow of the work and contribute to an efficient work environment, and treat the employer's business secrets and economic and commercial condition as confidential.

(2) Occupational safety specialists will be liable to the employer to whom they serve in respect of their negligence during the performance of occupational health and safety services.

(3) The occupational safety specialist should inform the labor and employment agency's provincial Managerate in writing if the employer has failed to take precautions against serious risks which require prompt suspension and those posing a threat to life such as fire, explosion, landslide or chemical spillage, which have been notified to the employer in writing for taking OHS precautions.

(4) The occupational safety specialist will enter his findings and recommendations on works carried out at the workplace and his actions related to issues specified in clause 9, works undertaken in collaboration with the Occupational Physician, and other issues which he may consider necessary in the approved log.

8.5.1.8. Occupational Physician

The roles and responsibilities of Occupational Physicians have been defined in the "Regulation on the Roles, Responsibilities, and Training of Occupational Physicians and Other Healthcare Staff" as follows:

Responsibilities of Occupational Physician

(1) The occupational physician will work with other healthcare staff if available at the workplace.

(2) Occupational physicians perform the following tasks as part of occupational health and safety services:

a) Guidance

1) To provide guidance for the employer with regard to the surveillance of work environment and health of employees as part of occupational health and safety services.

2) To submit proposals to the employer in order to ensure that the planning, organization, and performance of works, including design; condition, maintenance, and personal protective equipment in accordance with regulations on occupational health and safety and Operation rules on occupational safety.

3) To submit proposals to the employer regarding actions required to be taken in order to improve the health of employees.

4) To take part in surveys to be conducted in the field of occupational health and safety and to ensure harmony between employees and works y taking account of their physical and intellectual capabilities in terms of ergonomic and psychosocial risks and to conduct researches in order to protect them against stress factors at work, and to consider the findings of such surveys in guidance they provide.

- 5) To constantly monitor and inspect Operation hygiene in the company premises and annexes, including canteen, mess, dormitory, daycare center, and breastfeeding rooms and changing rooms, showers, and toilets and to make recommendations to employees regarding nutrition required for works performed and supply of fresh water.
- 6) To investigate the causes of work accidents and occupational diseases witnessed at the work place and to submit proposals to the employer about actions to be taken in order to prevent them.
- 7) To investigate the causes of incidents which have occurred at the workplace without causing death or injury, but could harm employees, equipment or the workplace and to submit proposals to the employer.
- 8) To inform the employer of actions required to be taken with regard to occupational health and safety in writing.

b) Risk assessment;

- 1) To take part in risk assessments concerning occupational health and safety and their implementation and to submit proposals to the employer regarding health and safety precautions that have to be taken based on the risk assessment and to follow up on them.
- 2) To closely follow, protect, and counsel groups requiring a special policy, including pregnant or breastfeeding women, minors, persons who have been diagnosed or prognosed with an occupational disease, people suffering from a chronic disease, old-aged people, disabled persons, alcoholics or drug addicts, and persons who have suffered more than one work accidents and to give special consideration to them in the risk assessment to be done.

c) Health Surveillance;

- 1) To inform employees of employment and periodic inspections and tests to be conducted as part of health surveillance and to get their consent.
- 2) To perform health surveillance of employees, including night shifts.
- 3) Based on the outcome of a risk assessment done at the workplace in accordance with international standards, taking account of the employee's personal qualifications, risk category of the workplace, and the nature of works, periodic medical examinations should be repeated:
 - a) at least once a year at workplaces classified as very dangerous;
 - b) at least biannually for minors, young, and pregnant employees included in the group requiring a special policy. These periods may be shortened by the occupational physician.
- 4) To record the results of employment and periodic medical examinations, which confirm that employees are fit for their jobs, and the results of required medical tests in accordance with the form specified in the regulation and to keep it at the workplace.

- 5) To perform medical examinations of groups requiring a special policy, persons who have been diagnosed or prognosed with an occupational disease, people suffering from a chronic disease, addicts, and persons who have suffered more than one work accidents and to issue reports and if there is any employee who has been diagnosed or prognosed with an occupational disease, to repeat the medical examinations of other employees working in the same place.
- 6) To determine if there is any connection between absence from work because of health issues and potential health hazards at the workplace and to plan measurements related to the work environment if necessary and to submit them to the employer for approval and to assess results in terms of employees' health.
- 7) To perform a reemployment medical examination of any employee who has returned to work after repeated periods of absence due to health issues and to recommend that any person who is not found to be fit for his or her work be assigned to another work commensurate with his or health condition and to submit it to the employer for approval.
- 8) To carry out efforts to control and contain infectious diseases and immunization, to provide information about hygiene, to ensure that necessary medical examinations and tests are conducted.
- 9) To record actions related to surveillance of health at the workplace, to make an assessment regarding work accidents and occupational diseases in collaboration with the occupational safety specialist, to conduct an investigation and survey in order to prevent the dangerous incident and to draw up preventive action plans and to develop an annual work plan comprising those issues and to submit it to the employer for approval, to follow actions taken and to prepare the annual assessment report.
- 10) To verify if any medical reports confirming that the employees of another employer, which have been temporarily assigned to the workplace, and contractor's employees are fit for their jobs has expired.

ç) Training, briefing and recording;

- 1) To plan employee training in occupational health and safety in accordance with applicable regulations and to submit such plans to the employer for approval and to implement or oversee such plans.
- 2) To organize first aid and emergency response services at the workplace and to train employees in accordance with the applicable regulations.
- 3) To train managers, members of the occupational health and safety board, if any, in Operation health, occupational health and safety, hygiene, harms of using substances creating addition, personal protective equipment, and collective protection methods and to ensure the sustainability of such training.
- 4) To inform employees about risks at the workplace, health supervision, employment and periodic medical examinations.
- 5) To draw up the annual assessment report containing the results of health supervision and actions related to occupational health and safety in collaboration with the occupational safety specialist.
- 6) To inform OHS SECRETARY about issues related to occupational health and safety which may be designated by the Ministry.

d) Cooperation with other units;

- 1) Based on the results of health surveillance, to recommend that necessary measurements are performed as part of the supervision of the work environment and to assess the outcome of such measurements in collaboration with the occupational safety specialist.
- 2) To work in collaboration with the occupational health and safety board, if any, which they have joined.
- 3) To cooperate with the stakeholders in order to provide information and training regarding occupational health and safety at the workplace.
- 4) To take part in the development of programs for the improvement of existing policies concerning the analysis of work accidents and occupational diseases, programs aimed at improving work practices, and the assessment and testing of new technology and equipment in terms of health.
- 5) Working in cooperation with hospitals that are authorized to write health institution reports on occupational diseases in accordance with the "Regulation on Work Loss and Occupational Incapacity Ratio," and cooperating with the relevant units or institutions on the rehabilitation of persons who had occupational accidents or developed occupational diseases.
- 6) Taking part in research on occupational health and safety.
- 7) Assisting the occupational safety specialist in the preparation of occupational health and safety instructions and work permit directives, which will be used wherever applicable.
- 8) To draw up an annual work plan containing activities to be carried out in the following year in respect of occupational health and safety in collaboration with the occupational safety specialist.
- 9) To provide support for the support staff and the employees' representatives at the workplace, and to cooperate with these persons as necessary.

Authorizations of occupational physician

(1) The tasks and authorizations of the occupational physician are as follows:

- a) To seek the employer's approval for revising occupational safety analyses, instructions, and assessments issued with respect to the works undertaken by the subcontractors and Acacia Mining Operations Inc.
- b) If the vital risk which he has discovered at the workplace is serious and unavoidable and requires an urgent response, to apply to the employer for the suspension of the works.
- c) To conduct investigations and researches in all sections of the workplace as part of its responsibilities, to access required information and documents, and to interview employees.

d) To cooperate with appropriate agencies and organizations regarding issues pertaining to his responsibilities after informing the employer and in accordance with the internal directives of the workplace.

(2) Occupational physicians employed on the basis of a full-time contract are entitled to take part in trainings, seminars, panels and other similar organizations for professional development purposes. Within a calendar year, up to five business days spent attending such organizations will be considered as part of physician's normal work time, with no salary deductions being performed to the physician's salary for participating in these events.

Responsibilities of occupational physician

(1) When performing their duties laid down in this plan, occupational physicians should not interrupt the ordinary flow of the work and contribute to an efficient work environment, and treat the employer's business secrets, economic and commercial condition and information in the employees' personal health dossiers as confidential.

(2) Occupational physicians will be liable to the employer to whom they serve in respect of their negligence during the performance of occupational health and safety services.

(3) Occupational physicians should inform the labor and employment agency's provincial Managerate in writing if the employer has failed to take precautions against serious risks which require prompt suspension and those posing a threat to life such as fire, explosion, landslide or chemical spillage, which they have notified to the employer in writing for taking OHS precautions.

(4) The occupational physician will enter his findings and recommendations on works carried out at the workplace and his actions related to issues specified in clause 9 entitled the tasks of the w physician, works undertaken in collaboration with the occupational safety specialist, and other issues which he may consider necessary in the approved log.

(5) The occupational physician will refer any cases pre-diagnosed with occupational diseases to healthcare providing institutions authorized by the Social Security Institution.

8.5.1.9. Tasks of other health personnel

(1) Other health personnel will work together with the workplace

(2) The tasks of other health personnel are listed below:

a) Collecting data, maintaining the necessary records, and working together with the occupational physician on the planning, evaluation, monitoring and guidance of occupational health and safety services.

b) Writing down the health and occupational history of employees into the "entry to work examination form" and "periodic examination form," and assisting the occupational physician during examination.

c) Monitoring groups that require special policies, and ensuring that the necessary health examinations are performed.

d) Working together with the occupational physician in the organization and execution of first aid services.

- e) Working on the health trainings of employees.
- f) Working together with the occupational physician in the continuous monitoring and inspection of hygiene conditions at the workplace building and associated facilities.
- g) Carrying out any other occupational health and safety-related tasks given by the occupational physician.
- h) To provide support for the support staff and the employees' representatives at the workplace, and to cooperate with these persons as necessary.

Authorizations of other health personnel

(1) The authorizations of the other health personnel at the workplace are listed below:

- a) To conduct investigations and researches in all sections of the workplace as part of its responsibilities, to access required information and documents, and to interview employees.
- b) To cooperate with appropriate agencies and organizations regarding issues pertaining to his responsibilities after informing the employer and occupational physician in accordance with the applicable internal directives of the workplace.

(2) Other health personnel at the workplace employed on the basis of a full-time contract are entitled to take part in trainings, seminars, panels and other similar organizations for professional development purposes. Within a calendar year, up to five businesses days spent attending such organizations will be considered as part of the health personnel's normal work time, with no salary deductions being performed to the personnel's salary for participating in these events.

Responsibilities of other health personnel

(1) When performing their duties laid down in this plan, other health personnel should not interrupt the ordinary flow of the work and contribute to an efficient work environment, and treat the employer's business secrets, economic and commercial condition and information in the employees' personal health dossiers as confidential.

(2) Other health personnel will be liable to the employer to whom they serve in respect of their negligence during the performance of occupational health and safety services.

(3) Other health personnel are responsible for notifying the occupational physician about occupational health and safety-related observations and recommendations concerning the workplace.

8.5.1.10. Operation Officer (Electric Engineer):

The responsibilities of electric engineers working at the Acacia Mining Operations Inc. are defined under the "Regulation on Operational Responsibilities in EMO High Voltage Electric Facilities." According to Article 7 of this regulation, Responsibilities of the Operation Officer are as follows:

- a) Within the scope of this Regulation, assumes responsibility for the HV facilities belonging to the employer (with the exception of HV facilities to be used jointly with third parties). Aside from its responsibilities under the law, they the operation officer is also liable towards energy supplying institution on behalf of the employers.
- b) Inspects the HV facilities after assuming their duty, determining whether the facilities have any issues or shortfalls with regards to operation, and reporting any findings to the employer.
- c) Provides training to the relevant personnel at the workplace, and takes necessary measures to prevent any erroneous man oeuvres or operations.
- d) Prepares the single-line diagram of the HV facilities, and ensures that these diagrams are kept in units that contain the HV cells.
- e) Prepares directives for man oeuvres, and provides them to the operation personnel after obtaining the necessary signatures from them. These directives should be written on sufficiently large signboards and kept in the units that contain the HV cells.
- f) Any inadequacy in the safety materials will be reported by the operation officer to the employer, and the necessary actions will be taken to remedy this inadequacy. The operation officer will ensure that the maintenance, control and testing of the available safety materials is performed at sufficient intervals.
- g) It is essential that the necessary man oeuvres re performed by the operation officer. However, the operation officer can also have these man oeuvres performed by another authorized personnel at the workplace under his/her supervision, and in accordance with the applicable directives. The operation officers will be responsible for the man oeuvres duly performed by the said personnel. However, the operation officer will not be responsible for accidents resulting from man oeuvres that are not performed by the personnel according to the relevant directives, or from the personnel's personal mistakes.
- h) Regarding malfunctions that occur during operations, the operation officer will evaluate the malfunction and provide instructions for the necessary man oeuvres.
- i) Responsible for representing the employer at the energy supplying institution. The operation officer is responsible for maintaining the necessary contacts and communication with the energy supplying institution for subjects such as requesting power cuts; demanding that power is supplied once again; and dealing with outages, malfunctions and similar issues.
- j) Conduct the necessary activities concerning the employer, energy supplying institution and the maintenance officer, ensuring the necessary coordination between them and determining the day and time of maintenance activities.

k) Ensures that the relevant equipment is grounded and isolated from the voltage during the activities of the maintenance team, and is delivered as such to the maintenance team. Following maintenance activities, ensures that the relevant equipment is controlled and then taken from maintenance team, and that the equipment enters once again into operation by performing the necessary man oeuvres.

l) Continuously monitors the current state of the HV equipment, or ensures that they are monitored. Performs the necessary evaluations, and notifies the employer in case he/she identifies any issue that requires action.

m) Ensures that the daily maintenance of the plants under his/her responsibility are done by the operation personnel.

n) Is responsible for ensuring that the earthing tests are done regularly or when required in accordance with the operation conditions of the facility and Regulation on Earthing in Electric Installations.

o) When deemed necessary or once in every four months at latest, issues a report on the state of the plant, work to be done, problems (if any), solutions and measures to be taken, which is then submitted to the institution that provide energy, to the employer, and to the concerned EMO unit.

8.5.1.11. Visitors, Suppliers and Their Representatives are responsible for

1. Informing the Security Door and obtaining a visitor card while going in and giving the card back while leaving the site,
2. Obeying the instructions given by the Security Personnel and other Acacia Mining Operations Inc. personnel,
3. Using the personal protective equipment provided to them,
4. Obeying all policies, regulations and rules applied in Acacia Mining Operations Inc.,

Avoiding all kinds of unsecure behaviors likely to put both themselves and the others in danger.

8.5.2. Trainings

Health and safety trainings are offered to ensure that the personnel gain awareness, consciousness and qualifications, and that the regulations of Acacia Mining Operations Inc. are applied. Another objective is to identify the Operation terms of OHS knowledge and trainings that are required to be given to all personnel before they began to work at Acacia Mining Operations Inc. and of other trainings likely to be required in the following phases.

Managers are responsible for defining the personnel to receive the training, providing them with adequate time, and ensuring that they receive trainings appropriate for their fields of work. The same applies for the sub-contractors they are responsible for.

Each employee must take this 2-day training (total of 16 hours) upon starting a position in Acacia Mining Operations Inc. Acacia Mining Operations Inc. ACACIA-4000-Pln-001-Frm-003 Employment Start Form must be filled in to take part in the training. Employment Start Form consists of 4 stages:

- a- Signature of Human Resources Manager, indicating that all required documents are available,
- b- Health report issued by the Occupational Physician, and his/her signature indicating that the required checks have been completed,
- c- Articles a and b must have been completed to proceed with stage 3. The document indicating that the Basic Occupational Health and Safety Training for New Employees has been taken, together with the signature of Occupational Safety Expert who provided the training,
- d- Those who have completed the first three stages of OHSE are entitled to receive the personnel card issued by Acacia Mining Operations Inc. They are allowed to enter the site.

The same requirements apply to main sub-contractors. Sub-contractors are required to use Acacia Mining Operations Inc. Employment Start Form. However, for the articles b and c, the personnel of sub-contractors receive trainings from the OHS experts of the sub-contractor itself, and their documents are signed by the doctors working for the sub-contractor. On the other hand, Acacia Mining Operations Inc. Human Resources are responsible for human resources approval. Sub-contractor personnel who have completed the articles a, b and c are entitled to receive Acacia Mining Sub-Contractor Site Demonstration OHS Training. Those who have successfully completed Sub-Contractor Site Demonstration OHS Training are given entrance cards. Those sub-contractor personnel are permitted to work at site.

Trainings will be conducted by OHS Experts. Adequate time will be spared for basic training programs so that all issues can be addressed and discussed sufficiently. In order to promote learning, assessment tests will be applied after courses. Seventy percent success will be adequate to pass the concerned courses. Those who fail the tests are required to re-take the courses.

Training enrollment and reservation requests are required to be reported to concerned OHS personnel one week before the beginning of OHS training system and in accordance with the Training Plan. Training Plan will show predefined days of the concerned week for the concerned training programs, including the trainings that have been approved by OHS management and that have finalized the enrollment.

Basic Training and other OHS trainings will cover Operation health and OHS topics which are deemed to be associated with the works at mining site. Presentation content may be reviewed to reflect significant changes in site conditions, activities and certain requirements. Trainings may cover and give information on the following issues. However, it does not provide any special qualification and is not limited with the topics given below.

- Mining site OHS Targets and Objectives
- Site OHS Policies
- Information on legal legislation
- Legal rights and responsibilities of personnel

- Operation occupational health and safety rules
- Causes of work accidents and occupational diseases, and risks at work
- Determination and Reduction of Risks
- Occupational Safety Analysis
- Principles for protection from accidents, injuries and diseases, implementation of protection techniques and reporting the same
- Providing safe environments and systems at work
- Safe use of equipments
- Daily Safety Meetings
- Working at Height
- Protection from Falling Down
- Entering Indoor Areas
- Hot Works
- Excavation
- Permits
- Tools and Equipment
- Cranes and Lifting
- Road Safety
- Usage and transportation of chemical materials
- Use of personal protective equipment
- Working with equipment with screens
- Warning signs
- Risks brought by chemical, physical and biological materials
- Order, cleaning and hygiene
- Fire and protection from fire
- Thermal comfort requirements
- Ergonomics, electricity, dangers, risks and measures, first-aid, rescue etc.

VISITORS, SUPPLIERS AND CONSULTANTS

Private Security personnel will ensure those who have come to visit the Mining Site, suppliers and consultants to watch a 10-minute briefing/training film in the training room at the entrance. Visitor trainings are managed and recorded by the security unit. Then, upon reading the 'Visitor Brochure' and signing the document stating that they understood the warnings mentioned in this brochure, visitors are allowed to make a visit with the accompany of the personnel from concerned unit. All visitors, suppliers and consultants are responsible for obeying the information mentioned in this brochure and the warnings to be made by the accompanying personnel.

ADDITIONAL OCCUPATIONAL HEALTH AND SAFETY TRAININGS

Acacia Mining Operations Inc. OHSE Department provides the trainings in the following table, helps organise outsourced trainings, or accepts the trainings received from persons/organizations approved by the OHSE.

	Occupational Safety Trainings		Occupational Health Trainings
G1	Emergency Training	S1	Ergonomic Risk Factors- - Back Health and Handling Technics
G2	Accident & Incident Detailed Research and Examination Training	S2	Biological Risk Factors Training
G3	Hazard Identification and Job Safety Analysis (JSA)	S3	Noise and Occupational Hearing Loss Training
G4	Risk Assessment and Management	S4	Occupational Diseases Training
G5	Energy, Locking and Labeling	S5	Occupational Pulmonary Diseases Training
G6	Permit Systems (Permits for Working in Hot, Closed, Excavation and Scaffolding)	S6	Office Safety and Vehicles with Screens Training
G7	Safe Driving Technics Training	S7	Hygiene Training
G8	Safe Working with Chemicals Trainings	S8	Tick-Scorpion-Snake Bites Training
G9	Conveyor Safety Training	S9	Smoking and Harms of Smoking Trainings
G10	Hand Tools and Hands Protection Training	S10	Stress and Stress Management Training
G11	Working at Height	S11	First Aider Training
G12	Basic Fire-Fighting Training	S12	Medical Wastes and Safe Working Training
G13	Scaffolding and Scaffold Inspection Training		
G14	Lifting and Slinging (Rigger) Training		
G15	Radiation Protection Training		
G16	Mining Rescue Team Trainings		

Employees' opinions are considered in determining training requirements, and new trainings based on needs and current training content update are provided by the related OHS Expert.

At the end of the trainings, 'ACACIA-4000-Pln-001-Frm-004 Training Participation Record Form' is filled. Training records are stored according to the record table.

8.5.3. Competences

Competence: Combination of knowledge, skill, training and experience. Competence is given for specific applications in the Acacia Mining Operations Inc. sites. It is not allowed for persons who do not have the competence for a job to do it without receiving related competence trainings.

Competence Trainings:

Energy, Locking and Labeling: Isolation officer and the persons who are to work in energy are required to receive it. Managed by its own regulations and forms.

Working at Height Competence: Acacia Mining Operations Inc. OHSE department gives this training or accepts trainings received from an approved person/organization. It is not allowed for persons who do not have received working at height competence to work at height and use the seat belt on site.

Hot Work Authorization/Excavation Work Authorization/Scaffolding and Scaffold Inspection Work Authorization/Working at Closed Space Job Authorization Competences: In job authorization systems, the persons in charge of the field should have the competence related to the respective job to approve the authorization forms. Supervisors and field officers who are not competent do not have the authority to approve job authorizations.

On Site Vehicle Use Competence: It is required to undergo site driving assessment to use light vehicles and trucks in Acacia Mining Operations Inc. sites. Persons who pass the assessment will have their cards stating the on-site driving competence and they are authorized to use vehicles on site.

Defensive Driving Competence: Those who will use the Acacia Mining Operations Inc. company vehicles off site are required to participate in this training and receive a passing grade. Those who do not have defensive driving competence will not be allowed to use company vehicle off site.

8.5.4. Communication, Employee Participation and Meetings

Employees can participate by expressing their opinions in each workplace practice and in each step related to the job that is being done. Any employee can participate in occupational safety meetings if they wish so, and specified employee representatives can also join. Employees are entitled to freely express their views and opinions in the meetings they join.

Employees who could not participate in the meetings deliver chronic or instantaneous hazards that they have seen to their supervisors. Besides verbal communication, employees can also write in 'Hazard Notification Boxes' located in many places around the site. They use 'ACACIA-4000-Pln-001-Frm-005 Hazard & Incident & Noncompliance Notification Form' to write their notifications. The form can also be delivered by hand instead of putting inside the boxes.

Notification boxes will be tracked daily by the OHSE Department. The hazards, noncompliance or near misses can be written in these forms. Reporting material damages or injuries is explained in article 8.5.6.

OCCUPATIONAL HEALTH AND SAFETY NOTICEBOARDS

In case of any announcement, notice or an issue to share with all employees that is related to OHS, noticeboards in various areas around the mining and working sites will be used. Occupational safety committee or other occupational safety meeting notes can also be put up daily on the noticeboards to inform the employees. It is the responsibility of the OHS department to keep these noticeboards up to date. All notices and announcements published and put up on the noticeboards will be filed as mentioned in the record management.

Also, these noticeboards will also include forms related to the OHS to be used in the operational sites. It is the responsibility of the OHS department to keep adequate number of forms in these noticeboards.

8.5.5. On-the-job Trainings (toolbox)

A briefing made before the job or regularly to the employees are trainings for the purposes of reminding.

A training participation form is filled after the on-the-job trainings and every department keeps a record in their own area. The presentation and verbal preparation for on-the-job trainings are carried out by the departments themselves. Departments plans and provides on-the-job trainings annually. 52 on-the-job trainings should be done in 52 weeks.

8.5.6. Reporting Near Misses, Material Damages and Injuries

Reporting near misses, material damages and injuries within the limits of the Acacia Mining Operations Inc. sites and taking necessary actions to avoid the recurrence of the same incident and following up those actions will be provided by the Managers. Reporting accidents - incidents is the main responsibility of the employees. Awareness by all of the accident-incident at the end of reporting is a precursor for the other departments and contractors doing similar jobs to take action.

'ACACIA-4000-PIn-001-Frm-006 Accident & Incident Reporting Form' will be used in reporting material damages and injuries.

8.5.7. Incident Records

Acacia Mining Operations Incident Records are separated into 4 and these records are followed up by the OHS Department:

- a- Near Miss Records,
- b- Property Damage Records,
- c- Accident Records Involving Injury

Injuries are classified under 4 main headings:

Lost Time Injuries: LTI - Day-loss injury if the employee(s) has a medical certification as a result of injury (for example; a person with a broken foot not being able to work for 1-40 days on sick leave...etc)

Restricted Work Injuries: RWI - The case of an employee who is not able to do their main job as a result of injury working in a more passive job (for example; a driver who has mild injury in their left hand first finger being assigned to an in-office job etc.)

Medical Treatment injuries: MTI - The cases requiring treatment beyond first aid but which do not require a case of limited working and day-loss injury (for example; being vaccinated after an incident etc.)

First Aid Injury: FAI - Basic injuries without working day-loss and which do not require limited working. (for example; applying a plaster to the hand etc.)

8.5.8. Proactive Records

Acacia Mining Operations proactive records are separated into 4 and these records are followed up by the OHS Department:

- a- Hazard-Incident-Noncompliance Notifications: Near misses, material damages and non-injuries,
- b- Risk Analyses: The analyses where the departments evaluated the hazards that they predicted in their areas of responsibility and took action,
- c- Occupational Health and Safety Meetings: Where health and safety issues are discussed, final decisions are taken, employees are represented, participate and the meeting is recorded in minutes.
- d- On-Site Work Area Controls: Reports where Acacia Mining Operations Inc. employees control and record their own area and contractor works,
- e- Inspection: Reports where an outsourced system including OHSAS, ISO, Ilbak Holding Main OHS Department, third persons or organizations, insurance company are inspected.

8.5.9. Safe Management of Activities

The management of health and safety rules to be used on site and the written documents of the departments will be based on this plan. Similarly, subcontractor firms also need to update their own OHS regulations, procedures, instructions and form according to the Acacia Mining Management Plan of OHS. Subcontractors who do not wish to update or prepare again are required to comply with the legal regulations as well as Acacia Mining Operations Inc. plan, manual, regulations and instructions.

8.5.9.1. Management Plan of Occupational Health and Safety

Management Plan of Occupational Health and Safety is 'ACACiA-4000-Pln-001 Management Plan of Occupational Health and Safety'.

8.5.9.2. Emergency Action Plan

Emergency action plan is another document titled 'ACACiA-4000-Pln-002 Emergency Action Plan'.

8.5.9.3. Subcontractor OHSE Manual

The aim of the manual is to provide guidance to our subcontractors and employees about the expectations of Acacia Mining Operations Inc. from the subcontracting manpower. All subcontractors of Acacia Mining Operations Inc. should adopt the content of the manual and fully comply with it. The content of this manual should be reviewed, discussed and agreed by the subcontracting staff before doing any work for Acacia Mining Operations Inc. If any OHSE issue appears that is not addressed

in the manual or in the security program of the subcontractor, you should request for guidance from your Acacia Mining Operations Inc. subcontractor's representative.

Subcontractor's company is responsible for the safety of subcontracting employees and for ensuring that subcontracting employees carry out their duties in a safe and correct manner.

A subcontractor is responsible for the unusual behaviors and negligence in Acacia Mining Operations Inc. of its employees, representative, its own subcontractors and their employees Subcontractor will ensure that all its employees, representatives, its own subcontractors and their employees comply with the applicable Laws, Regulations, business rules, ILO recommendations and decisions, Turkish Standards and approved Practice Principles.

In case of a problem related to health and safety that they cannot solve, the subcontractor should consult to the Acacia Mining representative or the OHS Department.

8.5.9.4. Subcontractor Management

Subcontractor is managed by regulations and forms. The aim is to provide a systematic approach with respect to the selection, evaluation and management of the subcontractors in accordance with the Acacia Mining Occupational Health, Safety & Environment requirements, and to ensure that the works carried out by subcontractors to prevent the following issues:

- Harm to the company staff due to subcontracting activities,
- Harm to the subcontracting staff due to their own activities or those of Acacia Mining,
- Harm to the environment due to the violation of environmental commitments.

Asia Mining Operations Inc. is to hold an on-the-job OHS meeting before starting work. The organization of the meeting is under the responsibility of the related Manager. Subcontractor is managed according to the Management Regulation and its annexes.

8.5.9.5. Barricading

Alerting or protective equipment that is used to prevent employees from being exposed to hazard. When suitable barricading is done:

- It draws the attention of people and makes the hazard visible or identifiable.
- It prevents uncontrolled entries and provides the security of the working area and the employees.

PERMANENT BARRICADING

It is applied to areas that are pre-determined and set up to get the entries under control or those that contain in themselves hazards and remain there for a long time. Fencing around the mining permit site, transformer buildings being encircled, stair railings etc. can be shown as an example. Permanent barricades are both alerting and protective barricades, since they are physically resistant barricades that keep the employees away from hazards.

TEMPORARY BARRICADING

It is used where there is a temporary hazard and/or the work that is being done causes hazard for people nearby.

The types of barricading that need most to act with caution during use are temporary barricading.

CASES WHERE BARRICADING SHOULD BE USED

Temporary barricading is done in the cases where there is no hazard during normal working hours, but there is a potential hazard which the people in the work site may not be aware of after the work is carried out or emerging hazards are discovered, and where injury can occur as a result of unauthorized entry into the area without taking the necessary occupational safety measures.

The cases where barricading should be used are, including but not limited to, the following:

- While doing hot work at height concerning the burrs falling down during welding or cutting,
- During any excavation activity,
- During works at height,
- During works with crane,
- While intervening to hazardous materials,
- In scenes of accident,
- During any work in the walkways,
- During works in a confined space,
- During Loading-Unloading works,

8.5.9.6. Personal Protective Equipment

Acacia Mining Operations Inc. provides protective equipment complying with the required standards to all its employees. It provides and records health and safety trainings for the use of these equipment. All personal protective equipment to be used on site will have at least one of the TSE, CE, EN compliance. It is hazardous and prohibited to use nonstandard protective equipment on site. Minimum required personal protective equipment to be used within the limits of the Acacia Mining Operations Inc. site outside the office, bureau and specifically-designated areas:

Protective footwear (work shoes, boot etc.), protective eyewear (work safety goggles), high visibility overalls, protective headgear (hard hat etc.). In addition, special personal protective equipment are also determined and used. For example, special personal protective equipment protecting the eye, head, hand and body that will protect from welding beams should be used for an employee who is doing welding.

In specifically-designated areas, personal protective equipment may not be used. These areas are physically marked, and supported with signboards. No production is made, no physical work is carried out, and vehicles such as construction equipment etc. are not used for production and maintenance in this area. These areas are notified to all employees. Subcontracting companies are required to obtain a written approval from Acacia Mining Operations Inc. for the area they designated when they want to establish a special area. These areas are stated in risk assessments.

Personal protective equipment will be suitable for preventing the related hazard so as not to cause itself an additional hazard.

It will be suitable for the current conditions at the work site.

It will be in accordance with the medical condition of the worker using it and with the ergonomic requirements.

Roads	Light Vehicles	Construction Equipment (Truck, Crane etc.)
Plant Transportation Route - Core House Starts From The Entrance Gate	40 km/s	30 km/s
Plant, Lodging and Offices Zone	20 km/s	15 km/s
Core House and Mobilization Zone	20 km/s	15 km/s
Open-Pit Production Area, Waste Dam Area	40 km/s	40 km/s
Vehicle Towing	15 km/s	15 km/s

It will fully fit the user when necessary adjustments are made.

Only the department in charge of health and safety will make the choice for personal protective equipment. Other departments may make recommendations. Sample is brought from the chosen equipment in accordance with the needs. Samples are distributed to the staff working in different areas and their views are evaluated with the 'ACACIA-4000-Pln-001-Frm-007 Personal Protective Equipment Evaluation Form'. It is transferred to the procurement department after the approval of the physician and the security expert.

8.5.9.7. On-Site Driving Safety

Competence is required for on-site driving. Off site defensive driving competence is the competence for on-site driving, construction equipment use. Acacia Mining Operations Inc. OHS Department is responsible for ensuring on-site driving competence. The evaluation and approval of a competent person is required for defensive driving. Legally obtained documents are sufficient for using the construction equipment.

The Managers, Managers and Executives in charge of the area are responsible for checking whether the vehicles within the limits of the site comply with the speed limits or not. In addition, Acacia Mining Operations Inc. OHS Department follows up road safety with the radars set up in certain locations on site. In case of exceeding the speed limits, it is notified and reported to the supervisor in charge.

SPEED LIMITS The speed limits specified below are applied in the working areas.

CLASSIFICATION OF VEHICLES

Light vehicles	Heavy vehicles
<ul style="list-style-type: none">• Passenger cars, pickup trucks and Minibuses• Four-wheel-drive passenger cars, minibuses and pickup trucks• Staff transport vehicles with a passenger capacity of 12 or less• Trucks or vans with a capacity of less than 2.5 tonnes• Two- or four-wheel-drive vehicles with a capacity of less than 2.5 tonnes	<ul style="list-style-type: none">• Two- or four-wheel-drive vehicles with a capacity of more than 2.5 tonnes• Buses with a passenger capacity of 12 or less• Semi dump trucks• Light loaders• Dump/straddle trucks• Water tankers

8.5.9.8. Safe Lifting Works

Safe lifting aims to carry out the lifting works so as to ensure that safety measures are taken; documentations, examinations and inspections are completed; the crane works are carried out properly; the load to be lifted is connected; the loads are properly rotated and unloaded; the crane is correctly positioned with the help of appropriate communication signals between the crane operator and the reversing assistant and with the help of information about the parts and devices; the cranes are checked and their maintenances are carried out; and that the crane that is appropriate in terms of interspace and capacity is used.

LIFTING EQUIPMENT

All lifting equipment shall be checked before it starts to be operated. All lifting equipment should be in compliance with their rated SWL (safe working load). The safe working load (SWL) limitations shall be clearly marked on the equipment. Wherever possible, all lifting equipment should be marked with its safe working load. In cases when it is not possible to mark the safe working load directly on the equipment, the below mentioned alternatives can be acceptable:

- Mark the safe working load on the iron chains (i.e. on the lifting slings).
- Mark the safe working load on a metal plate that is safely attached to the equipment (i.e. on the chain adjusters).
- Safe working load labels on polyester covered slings.
- The safe working load shall be visible on the equipment (i.e. runway lights, crane truck booms).
- The load shall not exceed the dynamic and/or static capacities of the equipment. (This is the operator's responsibility.)

All lifting equipment shall meet or exceed CE-EN standards.

All lifting equipment shall be labelled in accordance with mobile vehicle site entrance rules on quarterly basis.

Safety Rules can be summarized as below:

1. The crane shall be operated only by licensed operators who are assigned, trained and permitted to use a specific crane.
2. The reversing assistants who connect the load shall be knowledgeable about the related communication signals.
3. The crane operator shall make sure that the vehicle is in good condition by checking the brake systems, limit keys, wheels, stabilizers, wire ropes/cables, hooks and hook safety catches. Besides, he shall also check if there is any deterioration or crack on the boom body.
4. The operators are obliged to obey any “stop” warnings; they shall take directions from the reversing assistants. Meanwhile, before starting to operate the crane, he shall check the safety of the working site with regards to traffic and personnel.
5. The operators shall make sure that all the stabilizers (support legs) are totally functional and that the vehicle is appropriately placed on them with a fine tuned slope.
6. Before lifting the load, the operators shall be informed about the below mentioned subjects and he shall take these into considerations.
 - The values about the boom slope, length and load radius shall be in compliance with the crane capacity (interspace diagram). (A crane should never be loaded more than its load capacity).
 - The hook should be positioned to enable lifting the load vertically.
 - Load weight.
 - Load is free to move and the slings are properly stretched.
 - Wire ropes are not interlaced and tightly spooled.
 - Unauthorized persons are removed from the working site.
 - The slope of crane is appropriate.
 - The load is prepared in good order; it shall be loaded and unloaded especially with steel-reinforced wire ropes. It shall never be loaded or unloaded by spooling wire ropes on the material that is used as a wire stack.
7. When lifting the loads, the operators shall act in compliance with the following rules:
 - He shall be aware of the load weight.
 - No instantaneous power shall be applied on the wire ropes.
 - He shall take into consideration the wind load when lifting the load upwards.

- He shall make sure that the load is well-prepared and shall lift the load as slowly as possible until the rope gets stretched. In case of any little hesitations, he shall unload the load and shall refuse to lift any loads that are not in compliance with the technical specifications of the crane.
 - He shall not cause momentary loses in the rope by applying excessive force on the loads that are connected to the ground or that make a sound.
 - He shall not try to drag the load.
 - He shall make sure that the personnel around the load and within the area of uplifting alignment remains at the safe distance. He shall also make sure that he does not run over the load with a vehicle and that he shall not let any personnel to ride on the load and be lifted with the crane.
 - The signalers/shooters shall wear helmets and the operators shall also wear helmets when getting off the crane.
 - All devices that may distract the concentration of operators (such as mobile phones) shall be switched off.
8. While moving, loading or unloading, the crane shall somewhat be at a minimum distance of five meters from the overhead power lines (OHPL). Under humid conditions, the safe distance shall be increased up to seven and a half meters.
 9. When long booms are used and when the loading area is wide, the wind loads shall be paid more attention to.
 10. The operator shall not permit the load to oscillate; he shall not unload any load if it has started to oscillate for some reason.
 11. Nobody but the operator shall be present in the crane.
 12. When the crane is loaded, he shall press brake slowly.
 13. The parking brake should always be set during loading and unloading.
 14. The steps used for climbing to or coming down from the crane or the flights of stairs should be cleaned from grease and any other lubricants.
 15. The crane cab shall never be left unattended with the crane engine running.
 16. While working, the operator shall not talk on the phone or smoke in the cab.
 17. Loading shall not be carried out at the same time with the main system and the jib.
 18. All devices shall be kept suitable before leaving the crane.
 19. Any dangerous situations, malfunctions, dangerous acts and behaviors shall be communicated to those concerned.
 20. The crane operator shall intervene in any kind of faulty actions to be carried out by the signaler or the reversing assistant. At the same time, he shall also prevent the entrance of unauthorized people to the enter the working site.
 21. The working site of the crane shall be sufficiently illuminated during night shifts or if it is underground.
 22. In case the crane stops due to an electric breakdown during crane process, the operator shall not leave the crane and shall remain in the cab under remote control.
 23. A lifted load should never be left unattended.
 24. The crane shall never be used to lift vehicles. Crane is a vehicle that shall be used only for loading and unloading.

25. Load flow diagram shall be used. The load capacity offered by the manufacturer shall not be exceeded.
26. Damaged or broken down equipment shall not be used.
27. The current loading charts and operating manuals of all cranes shall be kept available.
28. The slings, chains, hooks or straps shall never be dragged on the ground. The safety factor for slings shall be 7:1.
29. The lifting equipment shall be kept clean and shall be appropriately stored not to be in contact with the ground or with other materials.
30. All loads shall be controlled based on manuals.
31. Any crane work related to the movement of high loads shall be marked on the ground with signs. Accordingly, signs and barriers should be placed on the ground to warn about the possibility of objects that may fall on the ground.
32. Every truck crane shall be installed with an alarm device to warn people at times when the crane is moving or rotating.
33. The safety devices shall never be removed to exceed the permitted limits.
34. At least three tours of cables shall be present on the drum or on the crane at all times.
35. Operators shall not permit anybody to climb over the hook or the load.
36. The reversing assistant shall make sure that there are no materials, tools, etc. left on the load to be lifted.
37. Loads longer than two meters such as pipes shall be lifted with a two (2) legged sling to ensure better stabilization.
38. Lifting hooks, lugs, and lifting eyes shall not be welded, sharpened, heated, or mended.
39. Before carrying a crane under high voltage lines, in order to prevent contact with any part of the crane or to prevent the stimulation of electric induction process, the route shall be checked by the supervisor.
40. People shall never walk under a lifted load or a load that is lifted by a motorized rotating jib crane.

Please contact your supervisor in case you have any doubts or questions about load lifting.

8.5.9.9. Hand and Portable Power Tools

The use of these tools is regulated by written directives and forms specific to each of them. The responsibilities of the parties about these tools are as follows:

Employees

- Examine the tools prior to each use and notify your supervisor about damaged or faulty tools so that they can be removed from service for maintenance, replacement, or disposal.
- are responsible for the proper maintenance and storage of their own tools.

Supervisor

- Officially examines the tools on quarterly basis.
- Makes sure that these tools are operated in their intended use.
- Provides his personnel with tools that are in good condition.
- He approves the use of special tools and files the related documents.
- Disposes of the tools that are in bad condition so that they are not used again by any employees.

OHSE (Occupational Health, Safety and Environment) Department

- Examines randomly chosen tools in a sufficient number.
- Audits the quarterly examinations conducted by the electric supervisor and also the color coding of the electrical equipment.

These examinations shall be specified in the working site audits.

8.5.9.10. Working at Height

All the works to be conducted at height at Acacia Mining Operations Inc. sites and the use of safety belts while working at height shall be carried out only by the competent ones.

Height: The moment you move away from where you stand, you are at a height and there is no distance limit. Up to 1.8 m, the stairs can be climbed based on Three Points Rule. In all cases when the Three Points Rule cannot be ensured, job safety analysis shall be carried out and according to circumstances, fall prevention systems or fall stopping systems shall be used.

The extent of working at height includes all kinds of operations carried out higher than the level of the dock, ascended platform or lifting basket. Working at height equipment such as anchoring points, lanyards, safety belts, baskets, etc. shall meet the TSE EN standards. Working at height is regulated by directives and forms specific to this area.

8.5.9.11. Machine Protectors Directive

The inappropriate situations relating to machines (1) The following markings are accepted as inappropriate:

- a) Placing of CE marking -in accordance with this directive- on products which are not covered in this plan and in the current directive about Machine Protectors,
- b) Lack of 'CE' conformity marking and/or EC Declaration of Conformity on the machine,

Responsibilities with regard to machine protectors are as below.

SUPERVISORS

The supervisors are responsible for the following tasks:

- protecting all fixed machines in their working site in compliance with this procedure.
- conducting routine checks of all machine safeguards and safety devices and ensuring that they remain in operating state.
- ensuring that the employees are trained about the correct use of safety cabinets.
- providing relevant signs and place them at strategic points.
- turning off the machines and activating energy isolating devices or energy locking systems when they are found to be in bad condition or missing

EMPLOYEES

All employees are responsible for the following tasks:

- ensuring that all required safety cabinets are installed correctly to the machines and equipment they use or provide maintenance service for.

- not operating the machines or equipment that are lacking safety cabinets or that have safety cabins, which are in bad condition or which have been wrongly mounted.
- notifying their supervisors immediately when they think that the machine is under threat or if any of the safety cabins or protective devices is broken down.
- For whatever reason it is, none of the safety cabinets will be removed before the equipment is locked appropriately.

MAINTENANCE PERSONNEL

Maintenance personnel:

- shall ensure that safety cabinets are removed during maintenance services and that isolation and energy locking systems are applied,
- shall ensure that the safety cabins are immediately reaffixed after maintenance,
- shall not alter the safety cabins or their parts,

shall not add any parts, which are not provided by the manufacturer, or shall not remove any parts provided by the manufacturer. shall not damage the originality of the machine.

8.5.9.12. Electric Safety

For works requiring electricity component or studies conducted on equipment, specific directions or directives shall be prepared. In case a kind of intervention that is not mentioned in the written rules should be made, occupational safety analysis shall be conducted and the situation shall be intervened in. The responsibility of works and requiring electricity component shall be taken by the heads of departments. Plant Maintenance Unit shall be responsible for checking, intervening, carrying out periodic maintenance, and express opinions.

All equipment including the electric wall boxes/cabinets, etc. shall be in compliance with the energy locking system. The electrical equipment shall not be intervened by anybody other than the authorized employees. In order to ensure that nobody except the authorized employee can intervene in, the electric boxes/cabinets shall be kept locked and organized in a way that only competent electricians can open them.

8.5.9.13. Acacia Mining Search and Rescue Team

Acacia Mining Operations Inc. trains its own team to intervene in any possible emergencies to occur in the working site, and supports these trainings with drills. The team is managed based on the strategy of members on alert for 24 hours, and in accordance with related written directives and instructions. Search and rescue team intervention modules:

First Aid Response

Hazardous Material Spill Response

Responding to Traffic Accidents

Responding to Rope Access Works (confined space, working at height, etc.)

Fire (truck, vehicle, forest, etc.)

8.5.9.14. Mobile Equipment

SITE ENTRANCE and WORK PERMITS

The entrance and exit of mobile equipment to and from the working site shall be monitored. This procedure shall be applied in all parts of the working site except the parking lots for guests. In order to ensure that only the vehicles with safety equipment are allowed in the working site, colored labelling and control systems shall be applied on quarterly basis. The vehicles that do not have labels on them at the defined dates are not allowed to enter the working site and they meet their needs outside Acacia Mining Operations Inc. Mobile equipment include trucks, vans, automobiles, lifting equipment with or without baskets, cranes, excavators, loaders, graders, Jumbos, etc.

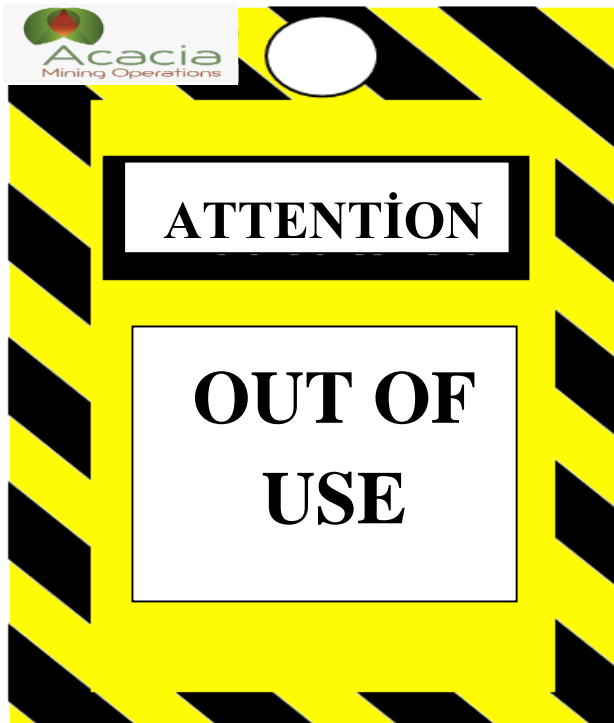
DAILY CHECKLISTS

Mobile equipment shall be checked on daily basis by their operators based on the pre-operation checklists. If a vehicle is lacking the checklist during the working site audits and controls, it shall not be permitted to be operated.

The operator or the user who completes the checklist shall submit it to his immediate supervisor. If there is something missing or there is an inappropriate situation in the vehicle, it shall not be used in the working site and shall be sent for maintenance.

In

such cases, out of service card shall be hung on the ignition switch of the vehicle.

A yellow rectangular sign with black diagonal hazard stripes on the left and right sides. At the top left is the Acacia Mining Operations logo. Below it, a white rectangular box contains the words "OUT OF USE" in large, bold black capital letters. Below that, a white rectangular box contains the text "Remove the card can only be authorized" in red. Below this, there is a section titled "By card" in a white box. To the left of this section is a white box containing the following labels: "Name :", "Date :", "Signature:", and "Why :". To the right of the "By card" section is a white box containing the label "Time :". Below these labels are horizontal dashed lines for handwritten information.

Out of service cards shall be hung on all appropriate equipment to be detected during working site controls, just like the case in mobile equipment.

Out of service cards can be hung by any employee. The ones who can remove the card and get them into operation shall only be the competent employees in the related field.

For example, when an out of service card is hung on an unappropriated electrical hand tool, it can be removed only after the competent electrician carries out its maintenance and repair.

8.5.9.15. Pressurized Vessels Directive

The pressurized equipment in the sites of Acacia Mining Operations Inc. shall be controlled on a periodic basis as specified in the related legislations. Subcontractors shall submit to Acacia Mining Operations Inc. the documents showing that the controls have been carried out. The vessels shall meet TSE EN standards.

8.5.9.16. Energy Locking and Isolation Procedure

Shall be applied to all energy intensive works carried out in the mine site. Energy does not mean only electricity; it also covers air energy, hydraulic energy, gravity energy, pressurized water energy, etc. Energy locking mechanism shall be managed by competency.

Acacia Mining Operations Inc. OHSE Department shall provide the related trainings and the Managers shall decide who from their departments shall be responsible for isolation and publishes the related decision. The Managers shall provide energy locking systems specific to the areas they are responsible for, and shall enable that they are used.

8.5.9.17. Hot Work, Excavation, and Confined Space Permit Systems

Work permit systems shall be managed based on competency. OHSE Department shall organize and provide the related trainings in this area. The departments shall use work permit systems, carry out audits, and fix the inappropriate situations during their operations. In the case of subcontractor works, the responsibility is beared by the Managers, managers, engineers, and supervisors of the subcontractor companies. Acacia Mining representatives shall be the ones to facilitate that the subcontractors are provided with these competencies and to audit the implementation.

8.5.9.18. Scaffolding and Auditing System

All the scaffolding works to be conducted on the working site shall be carried out by using equipment that meet the TSE EN standards; the minimum standards shall be EN 12801 and EN 12811. Non-standard scaffolding is forbidden. Scaffolding works shall be carried out only by certified scaffolders who have received special scaffolding trainings. Permit system is used during the auditing of the scaffolds that have been constructed. If any unfavorable situations are detected on the scaffolds during the daily controls, they shall be announced as out of use by a yellow label. If it is found out during the daily controls that the use of scaffold is safe, it shall be announced with a green label and the permit for working on the scaffold shall be given. It is regulated by directives and forms specific to this area.

8.5.9.19. System for Working with Explosive Materials

If any explosive enters the site of Acacia Mining Operations Inc. and is used here, the risk analysis shall be updated. Measures shall be taken in accordance with the risk analysis, current legislations, and international standards (ILO, etc.).

8.5.9.20. Change Management

Is applied to ensure the continuity of safe production. Change management is applied in cases when there is a new facility or equipment to be provided, a fixture or equipment to be changed, or a change in the production management. Change management shall start with HAZOP (Hazard and Operability) study or Risk Assessment. Depending on the technical aspect and the location of implementation, the Manager of the related department and the OHSE Manager shall choose one of the two methods. According to the selected method, teams shall be formed to proceed or the method shall be implemented by utilizing from external sources. Change management shall be applied to all kinds of works. It is regulated by directives and forms specific to this area.

8.5.9.21. OHS Signs and Symbols

Are used in order to ensure that the signs and symbols to be used in the site are in compliance with safety standards. The signs shall be placed close to the locations where there is a special risk, close to the hazardous objects, and at the entrance of places that are under Operation risk by taking into consideration the obstacles. They shall be positioned at eye level height in a well illuminated and visible manner. Where natural light is weak, fluorescent colors, reflector equipment, and artificial illumination shall be used.

8.5.9.22. Workplace Hygiene

Is applied to ensure the health of working sites and employees. Hygiene trainings are obligatory for food preparation workers while hygiene and protection trainings are obligatory for cleaning staff. In the cases when Acacia Mining Operations Inc. and its subcontractors provide sheltering for the employees, they shall be subject to hygiene checks on quarterly basis. The hygiene checks shall be carried out by the on-site doctors and be recorded. The records shall be managed in accordance with record charts.

Since the sheltering areas are subject to certain conditions such as beds, toilets, and amount of air per person, the company representatives of Acacia Mining Operations Inc. and the subcontractor define the sheltering conditions together. The final decision shall be made by Acacia Mining Operations Inc.

8.6. Action For Progress

8.6.1. Objective and Importance

The management shall be required to evaluate the systematic health and safety cycle on annual basis and to make financial investment intensive decisions. As a result of the targets of the department, the Operation health and safety target of Acacia Mining Operations Inc. shall ultimately be covered in the production target and the required financial investment, time, and personnel shall be provided.

The developing technology and current legislations are binding. The monitoring of legislations shall be carried out by OHSE Department and other departments shall be informed accordingly. The departments shall monitor the current legislations related to their fields and shall define corrective and preventive activities to improve implementation.

8.6.2. Steps to Carry Out Corrective and Preventive Activities

This is one of the last steps. The power of sanction is the support provided by the management to the system. Managers and managers shall evaluate the corrective and preventive activities in their internal meetings and follow up continuously.

8.7. MONITORING

8.7.1. OBJECTIVE AND IMPORTANCE

The common objective of all the works is to organise and manage the works that should be conducted to avoid accidents. Evaluation and control phase is one of the most important pillars of ensuring the improvement and sustainability of health and safety works. Acacia Mining Operations Inc. records the health and safety statistics and evaluate them in periodical meetings. External audit services shall be received to ensure the efficient control of the system.

8.7.2. Monitoring And Measuring

Shall be managed and monitored in accordance with Monitoring and Measuring chart.

8.7.3. Active And Reactive Monitoring

Active Monitoring means the examination of control measures in order to check if the correct control measures are taken and if they are utilised prior to incidents such as accidents. It measures progress.

In Reactive Monitoring, the data about accidents, incidents, and occupational diseases are used to emphasise the risky points. It measures errors.

8.8. Performance Evaluation

Is made based on annual health and safety targets. Each department shall set annual health and safety targets. Every year between October 15-25, performance evaluation shall be conducted and new targets for the next year shall be set. In accordance with the targets of the departments, the Managers shall also set personal health and safety targets for their employees. The targets shall be SMART.

Let's say that one of the 2019 targets of the facility department is to update the risk analysis. The target can be to complete the updating of 50 percent of the risk analysis by the end of the sixth month. which is a SMART (Specific, Measurable, Assignable, Realistic, Time-related) target.

8.9. Audits And Working Site Controls

Audit: means the systematic, objective, and critical evaluation of the health and safety management system. Periodical audits and controls shall be carried out at the sites of Acacia Mining Operations Inc. and its subcontractors. The content of audits and controls shall be as given below:

AUDIT	WORKING SITE CONTROL
Reviews the Documents	Checks the Workplace
Reviews the Directives	Checks the Records
Verifies the Standards	Is Operationly Rapid and on Daily Basis
Checks the Workplace	Can be Done with Basic Competencies
Can be a Long Process	It is a Part of the Audit
Requires Considerable Competency	

The report prepared as a result of the audits shall be evaluated and if there are certain deficiencies defined in the report, a reasonable due date is given to enable the deficiencies to be overcome. The deficiencies shall be overcome by the responsible departments until the due date and the report shall be recorded and kept. On the other hand, the positive findings of the report shall be monitored for continual improvement and their sustainability shall be ensured. The monitoring of reports and the imposing of sanctions are under the responsibility of the Managers in related fields.

Every department shall control its own working site and the OHSE Department shall be responsible for controlling the entire working site. If the departments define the number of controls in their annual targets, this shall support efficient and planned controls. A reasonable due date shall be given for the corrective and preventive activities that have been defined in the working site controls, and shall be indicated in the report. Monitoring of the corrective and preventive activities is under the responsibility of the Managers of the related sites that have been controlled.

The departments prepare annual plans for site control. OHSE Department shall cover the site controls in its annual work plan.

8.10. Accident/Incident Investigations

The initial reporting of the accidents resulting in material damage or injuries, and of the nearly missed accidents shall be done through ACACIA-4000-Pln-001-Frm-006 Accident/Incident Reporting Form. OHSE Department shall evaluate the training requests about Accident/Incident reporting and shall provide the related training. Accident/Incident shall be reported by the employee to his immediate supervisor. OHSE Department shall be responsible for the monitoring of reports and supporting the accident/incident investigation team in cases requiring an investigation.

The accident reporting shall be done in written in the first 24 hours. If the risk rating of the need for a detailed accident investigation is under 15 according to the risk assessment, the implementation of accident investigation shall be subject to the

decision of the Operation Manager, Manager of the Related Department or the OHSE Department. If the risk rating of an accident is found out to be over 15 in the risk assessment, investigation shall be carried out.

Within 24 hours beginning from the time of decision to carry out accident investigation, the ACACIA-4000-Pln-001-Frm-008 Safety Warning Form shall be prepared and published by OHSE Department.

8.11. Operation Audit

Reference organizations in the preparation, updating, auditing, and applicability of the document to Acacia Mining Operations Inc.'s Gökırmak Copper Project:

- International Labor Organization (ILO) <http://www.ilo.org>
- Republic of Turkey Prime Ministry Legislation System <http://mevzuat.basbakanlik.gov.tr/>
- Occupational Safety and Health Administration (USA) <http://www.osha.gov>
- Health and Safety Executive (United Kingdom) <http://www.hse.gov.uk>
- Worksafe (West Australia) <http://www.safetyline.wa.gov.au>

Occupational Health and Safety Management Plan has been prepared in accordance with the advices and decisions of International Labor Organization (ILO) and so as to meet the minimum requirements of Occupational Health and Safety and Environment legislations defined in the Republic of Turkey Prime Ministry Legislation System.

8.12. Training

AMI will provide to its own personnel with a broad range of trainings, including Operation induction, site specific induction, occupational health and safety and environmental awareness/protection trainings. The Company will require the contractor/subcontractors to provide the same level of trainings to their personnel and will monitor the effectiveness of these trainings through monitoring of records.

The multiple OHS trainings that will be provided are described in detail under related sections of this plan, especially under "Section 8.5.2".

8.16. Review And Update

The plan shall be reviewed by the Occupational Health, Safety and Environment Department once in a year. Should there be a need for a revision during the reviews, updates shall be done in accordance with article 8.2.3.

9. DISTRIBUTION LIST

This document applies to everyone who has access to the working site of Acacia Mining Operations Inc. Distribution List is as follows.

Department / User Name
All Users

10. REVISION RECORDS

Revision No	Date of Revision	Reason of Revision
2	13.01.2017	New Operation Manager