



**Acacia**  
Mining Operations

## **ACACIA MINE OPERATION**

## **GOKIRMAK COPPER MINE**

## **Labor Management Framework**

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<b>1.</b>	<b>INTRODUCTION .....</b>	<b>2</b>
1.1.	Scope .....	2
1.2.	Purpose .....	2
1.3.	Other Management Plans.....	3
1.4.	Implementation .....	3
<b>2.</b>	<b>ROLES AND RESPONSIBILITIES.....</b>	<b>3</b>
<b>3.</b>	<b>PROJECT STANDARDS .....</b>	<b>4</b>
3.1.	Applicable Turkish National Standards .....	4
3.2.	The EIA Requirements .....	4
3.3.	Commitments made to the official bodies of Turkey, and the requirements of such bodies.....	4
3.4.	Applicable International Standards and Guidelines .....	5
3.5.	Regulations and Procedures of Acacia Mining Company .....	6
<b>4.</b>	<b>MITIGATION MEASURES AND MANAGEMENT CONTROLS.....</b>	<b>6</b>
<b>5.</b>	<b>MONITORING .....</b>	<b>8</b>
5.1.	Requirements of Monitoring .....	8
5.2.	Key Performance Indicators.....	8
5.3.	Key Monitoring Activities .....	8
5.4.	Key Labor Management Measures .....	9
5.5.	Workers Accommodation and Transportation .....	12
5.6.	Contractors / Subcontractors and Supply Chain Management .....	12
<b>6.</b>	<b>TRAINING .....</b>	<b>14</b>
<b>7.</b>	<b>AUDIT AND REPORTING .....</b>	<b>15</b>
<b>8.</b>	<b>REFERENCES .....</b>	<b>16</b>

## 1. INTRODUCTION

This framework introduces the basic regulations, procedures and requirements implemented by Acacia Mining Company to ensure that a good work environment is provided and fundamental rights and principles of employees are protected and respected by Acacia Mining Company and its Contractors. It intends to manage and control the activities that may pose risks with regard to labor, presents potential impacts and outcomes and how to mitigate them. Acacia Mining Operations acts in compliance with national and international commitments relating to workers rights and working conditions in provision of opportunities of employment at all working sites. The in place, it will be implemented in compliance with Human Resources Policy (ACACIA-2017-HR-POL-175). The framework, we hope, can give an indication of some of the key issues that we need to consider. Any comments and views on the framework would be gratefully received and treated in the strictest confidence.

### 1.1. Scope

Once the Management Plan is fully developed it will covers all AMI activities, including contractor activities. Implementation by contractors is addressed in the Supply Chain and Contractor Management Plan (ACACIA-2017-E&S-PLN-179) and include full-time and part-time workers including those on short-term contracts.

### 1.2. Purpose

The purpose of this Management Plan once developed to:

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

This Management Plan sets out the basic principles and requirements implemented by AMI to ensure that AMI and its Contractors and suppliers respect the fundamental principles and rights of workers through promoting a decent work place. This includes:

- fair treatment;
- non-discrimination on the grounds of sex, ethnic origins, religion, race, nationality, age, physical capacity, pregnancy, marital status, sexual orientation, union membership, political views and similar other characteristics,
- offering equal opportunity to all employees,
- establishing, maintaining and improving a sound worker-management relationship;
- promoting compliance with any collective agreements to which AMI is a party,
- fully complying with national and International laws on employment and labor (as defined in the Constitution and legislations of Turkey, and in ILO standards),
- ensuring that work environments are healthy, reliable and comfortable.
- protecting and promoting the safety and health of workers, especially by promoting safe and healthy working conditions;
- preventing the use of forced labor and child labor (as defined by the ILO and Turkish legislation).
- establishing a healthy relationship between the Employer and the Employees,
- developing a well disseminated and well managed worker grievance mechanism.

Implementation of the Labor Management Plan is also central to maximising the opportunities for local employment and ensuring a fair distribution of jobs to all affected settlements. The project construction phase is ongoing, currently employing 488 people and the peak construction phase workforce will be 797 people for a period of three months, followed by the operational phase workforce of 496 people. Local employment will be prioritized PAPs with necessary skills and experience who live in the Project Area and are impacted directly by the Project will be given priority for job opportunities in line with AMI local employment procedures. The operation phase is expected to take 12 years. Approximately 544 people will be employed during operation phase, and employees from directly affected settlements will be given priority for local employment. Hence the project will assume an important function also during operation phase in keeping the local work force in the district. This is vital to establishing a good relationship between the Project and the local people. Therefore, this Management Plan also aims to outline the skills development and training program to ensure that local people can benefit

from the Project. This Plan will support Contractors to be in compliance with EBRD PR2 and national legislation. Contractors will prepare their own management plan in the scope of AMI's standards.

### **1.3. Other Management Plans**

This management plan shall be taken in to consideration with these management plans.

- Supply Chain and Contractor Management Plan (ACACIA-2017-E&S-PLN-179)
- Community Development Framework (ACACIA-2017-E&S-FRM-176)
- Livelihood Restoration Plan (ACACIA-2017-E&S-SRM-PLN-182)
- Health and safety management procedures as developed and implemented by AMI

### **1.4. Implementation**

The implementation of this plan is available for three project phases; namely, construction, operation, closure phase. This Management Plan is owned by the AMI HR Manager. It is a living document. AMI may revise this plan in the scope of ESMMF and will control implementation by contractors in a monthly basis. Monthly payroll checks, quarterly internal audits and grievance logs will assist AMI to monitor this implementation effectively.

## **2. ROLES AND RESPONSIBILITIES**

Human Resources Manager has the overall responsibility for labor management and other related human resources management plans and procedures. Plans and procedures including necessary resources to implement these plans will have to be approved by CEO/*General Manager*.

**Human Resources Manager** will also be responsible for

- Managing the procedures and plans related to the regulations and requirements of the Company,
- Managing the processes of recruitment, employment and training in compliance with the national legislation and EBRD PR 2,
- Preparing reports for compliance with the undertakings and other issues required by laws.
- Organise direct and indirect employee audits on regular basis to ensure that employment policies, and procedures of contractors in line with international standards and national regulations.

### **Department Managers:**

Provide support for the implementation of Human Resources Policies, Procedures and Standards, performance evaluation and monitoring.

### **Key Interfaces**

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

- AMI Project Construction Manager, particularly in relation to the implementation of AMI Human Resources policies;
- AMI Mine Operations Manager, particularly in relation to the implementation of AMI Human Resources policies;
- AMI Director Administration and Finance, particularly in relation to Contractor contract compliance;
- AMI Human Resources Manager, particularly in relation to labor management;
- AMI Health, Safety, Environment and Training Manager, particularly in relation to worker health & safety issues.

### **3. PROJECT STANDARDS**

All project activities shall be in compliance with the applicable standards. Such standards are listed below:

- National Legislation
- Turkish EIA Requirements
- Other commitments to and requirements of Turkish Government authorities
- Applicable international standards and guidelines
- EBRD Performance Requirements
- Applicable ACACIA Standards, policies and procedures

#### **3.1. Applicable Turkish National Standards**

##### **Occupational Health and Safety**

All matters related to occupational health and safety are handled in accordance with the Occupational Health and Safety Law (Law No. 6331, Effective Date: 20/06/2012).

##### **Labor Law**

The Labor Law (Law No. 4857) regulates the relationships between the employers and workers.

##### **Turkish Health and Safety Standards**

Certain health and safety standards are in effect in Turkey to directly or indirectly protect the labor force and communities with regard to various hazardous industries including those specified below:

#### **3.2. The EIA Requirements**

Republic of Turkey Ministry of Environment and Forest Affairs - EIA Guidelines - Quarry Operation and Ore Preparation - Processing Plants.

#### **3.3. Commitments made to the official bodies of Turkey, and the requirements of such bodies**

International Labor Organization Conventions Signed by Turkey

Turkey has signed a lot of Conventions of the International Labor Organization (ILO) including the following:

- Regulation on Manual Handling Works
- Regulation on Health and Safety Measures for Work with Chemicals
- Regulation on Personal Protective Equipment
- Occupational Health and Safety Regulation for Mining Workplaces
- Regulation on Health and Safety Signs
- Anti-Dust Regulation
- Occupational Health and Safety Regulation for Construction Works
- Regulation on Protection of Employees from Noise-Related Risks
- Regulation on Protection of Employees from Explosive Environment Hazards
- Regulation on Protection of Employees from Vibration-Related Risks
- Regulation on the Procedures and Principles of Occupational Health and Safety Trainings of Employees
- Regulation on Health and Safety Conditions for the Use of Work Equipment
- Regulation on Tasks, Authorities, Responsibilities and Training of Occupational Safety Specialists
- Regulation on Occupational Health and Safety Risk Assessment
- Regulation on Emergency in Workplace Forced Labor Convention, 1930
- Minimum Age (Industry) Convention (Revised), 1937
- Work Conditions (Public Conventions) Convention, 1949
- Protection of Wages Convention, 1949
- Right to Organize and Collective Bargaining Convention, 1949
- Equal Wage Convention, 1951
- Social Security (Minimum Standards) Convention, 1952
- Abolition of Forced Labor Convention, 1957
- Discrimination (Occupation and Profession) Convention, 1958
- Equal Treatment (Social Security) Convention, 1962
- Workers' Representatives Convention, 1971
- Minimum Age Convention, 1973
- Human Resources Development Convention, 1975
- Tripartite Consultation (International Labor Standards) Convention, 1976
- Occupational Health and Safety and Work Environment Convention, 1981
- Termination of Employment Convention, 1982
- Convention on Health Services, 1985
- Convention on Safety and Health in Construction Works, 1988
- Convention on Safety and Health in Mines, 1995
- Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, 1999
- Promotional Framework for Occupational Health and Safety Convention, 2006

### **3.4. Applicable International Standards and Guidelines**

International standards to be implemented by Acacia Mining Company are those which are determined by the European Bank of Reconstruction and Development (EBRD), specifically Performance Requirement 2 – Labor and Work Conditions (PR2).

Under EBRD Performance Requirement 2 Labour and Working Conditions, proper human resources management, respect for workers rights, including freedom of association and the right to collective bargaining, and promotion of workers' health are key to the sustainability of an enterprise. Management of non-employee workers, the process of redundancy and grievances arising at the workplace are also covered by the standard.

AMI will comply with the requirements of EBRD Performance Requirement 2 when implementing its policies

“The objectives of this PR 2 are:

- Establish and maintain a sound worker management relationship
- Promote the fair treatment, non-discrimination and equal opportunity of workers
- Promote compliance with any collective agreements to which the client is party national labour and employment laws and the fundamental principles and key regulatory standards embodied in the ILO conventions that are central to this relationship
- Protect and promote the health of workers especially promoting safe and healthy working conditions

In promoting workers health and safety, reference is made to the need for projects to comply with EBRD’s Performance Requirement 4.

Where a project provides accommodation to workers, PR2 requires that the accommodation be appropriate for its location and be clean and safe and meet the basic needs of workers. Security personnel will be hired among people joined security course realized in Nov. 2016.

### 3.5. Regulations and Procedures of Acacia Mining Company

- Human Resources Policy (ACACIA-2017-HR-POL-175)
- AMI Health and Safety Policy (ACACIA-2017-H&S-POL-180)
- Local Employment Procedure (Acacia-6000-Yng-001)
- Procedure of Disciplinary Practices
- Regulation of Ethical Rules
- Regulation on Leave of Absence
- Travel Regulation
- Corporate Vehicle Allocation and Utilization Procedure
- Supply Chain & Contractor Control Management Plan (ACACIA-2017-E&S-PLN-179)
- Employee Grievance Procedure (Preparation phase)

## 4. MITIGATION MEASURES AND MANAGEMENT CONTROLS

### Introduction

A range of mitigation measures have been developed to manage risks and impacts identified in the GCM Project ESIA.

### Management Controls

Based upon the identified impacts and opportunities presented above, the following control measures will be put in place during the construction and operations phase of the GCM Project.

Table 1 Key Management Measures

Table 1 Key Management ValuesNo.	Subject	Applicability / Activity	Control Description	Responsible Parties	Means of Verification
1	Legal	Compliance	Acacia Mining Company will implement policies and procedures in order to ensure compliance with the Turkish labor laws, relevant EIA Standards and Requirements, and international labor conventions (see Section 3.3 for ILO conventions applicable to this project). Compliance shall be inspected on the Personnel Database.	Acacia Mining Human Resource Management	Personnel Database and Records System.

2	Employment	Implementation of hiring policies and procedures	<p>AMI will implement and comply with the following labor relations policies and procedures:</p> <ul style="list-style-type: none"> <li>• Human Rights Policy</li> <li>• AMI Health and Safety Policy</li> <li>• Human Resources Policy</li> <li>• Recruitment Procedure</li> <li>• Training and Development Procedure</li> <li>• Procedure of Disciplinary Practices</li> <li>• Regulation of Ethical Rules</li> <li>• Regulation on Leave of Absence</li> <li>• Travel Regulation</li> <li>• Corporate Vehicle Allocation and Utilization Procedure</li> <li>• Contractor Control Management Plan</li> <li>• Employee Grievance Procedure</li> </ul>	Acacia Mining Human Resource Management	Policy and procedures
3	Redundancy	Implementation of redundancy and closure procedures	In case of collective redundancy, the management plans under the EBRD PR 2 will be followed. Demobilization Framework will be prepared before operation phase Q1 2018.	Acacia Mining Human Resource Management	Regulations and procedures
4	Training	Employment of local labor	AMI will provide training for operations workforce and construction workers transferring to operations to ensure that AMI has access to an appropriately skilled and trained workforce. This training may range from task-specific trainings to official occupational trainings depending on the needs of Acacia Mining Company. Such trainings will comply with the this plan and local employment and training procedures of Acacia Mining Company	Acacia Mining Human Resource Management	Regulations and procedures

### Hiring –Identifying Labour Needs

Forecasting workforce requirements in a systematic and timely fashion is important for the Project to ensure that sufficient time and internal resources are available to identify and find suitable local /regional candidates for all unskilled, semi-skilled and skilled positions.

### Recruitment and Hiring Procedure

AMI will design a range of policies and procedures designed to ensure that recruitment and hiring practices are fair and transparent, and that they take in to consideration local conditions and expectations to the greatest extent possible.

Discrimination in relation to recruitment and employment on the grounds of race, gender, age, disability, sex

AMI is committed to ensure compliance of its own operations and those of any contractors or sub-contractors working at the Project with the provision of the following:

- The Turkish Labor Law
- ILO Conventions
- EBRD Performance Requirement 2

AMI and its contractors will implement mitigating measures in accordance with their business areas in order to prevent, minimize and control the effects and risks related to labor and working conditions. Mitigation measures are described in detail within the SIA and implementation will be carried out in accordance with the SIA. Measurement, monitoring and evaluation of key actions related to these processes, such as recruitment and placement, complaints, discrimination, will be carried out in the framework specified in the SIA.



## 5. MONITORING

### 5.1. Requirements of Monitoring

Monitoring measures to be taken at the stage of operation in order to evaluate compliance with Project Standards (see Section 3: Project Standards) are described hereunder.

If non-compliance with Project Standards is detected during monitoring, the reasons for such non-compliance will be examined and corrective actions will be taken accordingly.

### 5.2. Key Performance Indicators

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

No.	Main Performance Indicator	Objective
1	Percentage of local employment  Percentage of workers from directly project affected area	50% semi- skilled, 100% unskilled  50% unskilled
2	Percentage of women employees	Women employees have priority to be employed.
3	Number of workers grievance	No employee complaint pending conclusion in the relevant period.
4	Employee complaints concluded as a percentage of complaints received.	

### 5.3. Key Monitoring Activities

Monitoring will focus on the following activities:

- Employment and development of employees and those who reside in directly affected settlements and the District of Hanönü;
- ensuring discrimination and harassment
- Employee/management relations, and complaints of employees
- Health and safety;
- Worker accommodation, particularly in relation with applicable Turkish standards and the guidance contained in the EBRD Guidance Note "Workers Accommodation. Processes and Standards".

Key monitoring measures are set out below.

Table: Key Monitoring Measures

ID	Topic/Aspects	Methods	Periodicity	Location
LMPm01	Employment	Analysis of records of male/female workforce ratio, including those in managerial positions	Annual	AMI site  Ankara Headquarters

		(supervisors and above)		
LMPm02	Employment	Number of worker grievances submitted, processed and resolved,	Annual	AMI site Ankara Headquarters
LMPm03	Training	Percentage of employees completing mandatory training as outlined in Personal Training Profiles and the Annual Training Plan	Annual	AMI site Ankara Headquarters
LMPm04	Policy Implementation	Number of cases of discrimination or harassment reported	Annual	AMI site Ankara Headquarters
LMPm05	Policy and Procedure Implementation	Review of procedure implementation records	Annual	AMI site Ankara Headquarters
LMPm06	Contractor Compliance	Review of records by AMI	Quarterly (construction) Annual (operations)	AMI site Contractor offices

- The Turkish Labor Law
- Relevant ILO Conventions; and
- EBRD Performance Requirement 2.

Key management measures are presented below in a thematic order (hiring, terms of employment, anti-discrimination and grievances, workers accommodation, unions and collective bargaining, contractor and supply chain management).

#### 5.4. Key Labor Management Measures

Acacia Mining Company shall act in compliance with the Regulations and procedures formed by constructing the employment process from the beginning to the end, and engage in practices that are intended to minimize the effects of adversities and maximize the benefit in this process.

Accordingly, the following points will be paid attention in this process:

- Determination of labor needs in advance,
- Informing the senior management about labor needs and taking their approval,
- Executing recruitment processes as per the Regulation on Selection and Placement and Recruitment Procedure,
- Giving priority to local employment in recruitment,
- Respecting workers right to freedom of association???
- Providing training programmes to enable local workforce to access a greater number of jobs and to take up higher skill jobs.
- Directing in compliance with the process any manager that may be included in the recruitment process and making sure that they are duly informed about the process,
- Determination of employment categories (Fixed-Term Employee / Indefinite-Term Employee / Subcontractor, etc.) and conducting the employment accordingly,
- Preparing the employment contracts in written and separately in accordance with the relevant employment category, and ensuring that contracts clearly include job title, task, salary and location of employment, and the approval of the employee is obtained
- Determination of all salaries and wages to be paid to employees and sub-employers in accordance with the regulations, procedures and requirements of Acacia Mining Company Human Resources,
- Acacia Mining Company will comply with the provisions of Turkish Labor Law, International Standards and EBRD Performance Requirements-2 for terminations and redundancy.

#### **Preferential Local Employment**

- In the process of employee selection, the Project gives preference to local workers from the neighbourhoods directly affected settlements in the local area and Hanonu District. This is a key element of the Project community development strategy. However, due to the need for specialised and experienced workers, some recruitment from the neighbouring district Taskopru and elsewhere in Kastamonu Province, other Provinces of Turkey and internationally is inevitable.
- Opportunities for direct employment will be constrained by the availability of appropriate skills.

#### **Information Provision as part of Recruitment Process**

Recruitment procedures include these following:

- Vacancy announcements must have appropriate approvals from AMI;
- AMI and its contractors will ensure that relevant announcements are made for all available vacancies;
- means of information distribution include advertising of employment opportunities in the local daily newspapers, online resources ([www.kariyer.net](http://www.kariyer.net));
- The Human Resources Manager is responsible for local employment;

AMI community liaison officers will inform local people about the application process and of conditions for employment.

#### **Categories of Employment and Employment Eligibility**

AMI defines two main categories of employees for its workforce:

- Permanent Employment
- Temporary Employment (or Contractors).

All recruitment information and employment contracts will specify an employee category and duration of the employment term. Permanent employment represents the Project personnel who have indefinite employment appointments. AMI has introduced position grades, defined in the relevant Human Resource documentation, that cover the range of skilled, semi-skilled and unskilled workers. Temporary Employees (or Contractors) represent members of the workforce who are hired for a specified term for a particular task assignment. Contractor positions fall into three subcategories: skilled, semi-skilled, and non-skilled.

Basic eligibility requirements for employment are as follows:

- all applicants must complete an application form and submit a CV detailing applicable experience related to the minimal (required) and desirable qualifications;
- applicants must be at least 18 years of age on the date of hire for all positions;
- citizens convicted of a criminal act by a legal court and currently serving their sentences are not eligible for appointment;
- preference is given to residents from the neighbourhoods in the directly affected settlements and Hanonu District (as outlined in the Local Employment and Training Procedure);
- medical clearance to be fit for work.

### **Work Contracts, Working Hours and Vacation**

Contracts of employment shall be in writing and may be for a fixed term or for permanent employment. All employees will receive a copy of their employment agreement, which will, as a minimum, address the following:

Working hours will be in compliance with Turkish Labor Law. All relevant attendance and leave requirements are set out in individual employment contracts and other relevant Human Resources documentation.

### **Labor Remuneration**

All wages and salaries paid to employees and Contractors must accord with the HR policies of AMI.

All employees of the Project and contractors must be provided with an employment contract that clearly sets out their salary conditions and other allowances.

Social security, government health insurance, workers' compensation, state disability and unemployment insurance are requirements of the Turkish Labor Law and Social Security Institution and are documented through written employment agreements. In addition to this, the Company will consider annual changes to pay scales due to inflation using rates issued by the Central Bank of Turkey.

### **Termination and Redundancy**

All worker terminations will be performed strictly according to Turkish legal requirements and AMI policies. AMI will establish procedures to guide the redundancy of employees at mine closure and to deal with unforeseen events during operations.

Key elements will include:

- at the time of hiring, the period of employment and the conditions for hiring and layoff will be clearly explained to new recruits and recorded in individual employment contracts;
- during regular meetings held with worker representatives, personnel management will share information on the Project's schedule and potential layoffs (particularly for temporary construction jobs);
- the Project is responsible for returning workers to the place from where they were recruited or to their domicile (the place of hire will be specified and transport service or cost of transportation will be covered).

Responsibility for further development of the redundancy procedures lies with the Human Resources Department of AMI.

### **Anti-Discrimination Policies :**

AMI commits to provide equal opportunity for employees and does not discriminate in the terms, conditions, or privileges of employment on account of race, age, color, sex, national origin, physical or mental disability or religion. The Grievance Procedure will be submitted after this plan is approved.

### **Grievance Management**

A worker grievance management will be developed which will be available to all workers. It will provide a way for workers to raise their workplace concerns. As per PR2 policy the workers will be informed of the grievance mechanism at the time of hiring. The grievance mechanism will be designed in a way that makes it easily accessible to all workers. Grievances will be

managed in a timely fashion. The mechanism will also allow for confidential complaints to be raised and addressed. Details of the mechanism will be provided when this Labour Management Framework is fully developed in to a Plan.

### Unions and Workers Representation

The Project endeavours to work in good faith with trade unions and any other bodies that employees collectively choose for their formal representation. Organised workforces are common in Turkey.

AMI has a range of policies in place and will implement, at minimum, the following:

- the Project will not seek to prevent by any means whatsoever the formation of trade unions or any other legally-established worker group(s);
- AMI and its contractors will comply with Turkish Labor Law concerning relations with authorised labor organisations and workers representatives;
- in the case of a stoppage of work or strike, AMI will ensure that relevant managers, contractors and other parties are informed promptly so that appropriate engagement and action can be undertaken to resolve the issue;
- in the event of stoppage or strike, AMI will arrange meetings with designated labor/worker representatives to determine the cause and to discuss and agree on resolutions; and
- If necessary, the relevant requirements of the Labor Law will be exercised, including using legal mediation and other means of arbitration.

### 5.5. Workers Accommodation and Transportation

#### Worker Houses

There will be two camp areas.

Camp	Total Employee		Number of People living in Camp Areas	
Phase	Construction	Operation	Construction	Operation
Köseoğlu Camp	260	340	130	200
Atila Camp	160	50→0	160	0

**Workers houses are in compliance with workers accommodation processes and standards.**

Acacia Mining Operations, aims to recruit 100% of unskilled and 50% of semi-skilled employees from local villages. These workers will continue to live at home and will travel to the mine site by bus each day.

It is expected that the remainder of employees will be recruited nationally and will live in Hanönü, Taşköprü and Kastamonu. A shuttle bus system will transport staff between the mine and residential areas.

### 5.6. Contractors / Subcontractors and Supply Chain Management

#### Contractor / Subcontractor Management

Contractors and Subcontractors working during construction and operation processes in the Mine Project construction areas shall literally comply with all the Acacia Mining Operations, procedures, instructions, standards and requirements (as appropriate and as laid down in the Contractor Management Plan Schedule and as specified in the Contractor Agreement). Acacia Mining will ensure that the terms of the contract reflect these requirements. This has already been done for the construction works completed between 2016-2017.

Total number of employees (from August 2017 Report)	No. of employees from project area (local employment)	No. of employees outside the project area
480	211	269

Local employment has a percentage of 100% for unskilled jobs and 50% for unskilled jobs.

Compliance of Contractors and Subcontractors with the Contractor's Management Plan has been developed by adopting Acacia policies and procedures or by applying equivalent procedures approved by Acacia Mining Operations..

The workforce of the Contractor / Subcontractor will primarily lodge in surrounding towns such as Hanönü. the Contractor / Subcontractors shall continue to operate in accordance with the region order determined in the Acacia Mine Local Procurement Procedure. The Acacia Mining Operations and the Main Contractors will inspect the accommodation and facilities of the Sub-Contractors after reviewing them, so that they will be make whether they meet Acacia Mining's standards of worker accommodation or not. The compliance of the contractors, their work and working conditions and the Contractor's policies and requirements will be checked by the Acacia Mining Human Resources Department. AMI will verify that the contractors' procedures, which they implement or enforce, comply with the relevant Turkish Laws and international standards (in particular the EBRD standards). The inspections will be provided directly by the Acacia Mining Operations Human Resources Department or by external parties such as labor auditors and or the competent government inspectors.

During construction, audits of Contractor HR policies, procedures and performance will be undertaken on a quarterly basis against Turkish regulatory requirements and AMI requirements and EBRD PR2. During operations, audits will be undertaken on an annual basis as a minimum.

The focus of Contractor monitoring will be on ensuring that employment arrangements do not contravene applicable Turkish Law or international standards and on monitoring the working and living conditions at Project work sites and in construction camps and accommodation.

## Supply Chain Management

During the construction and operation of the project, it is expected that all the suppliers / contractors of AMI will comply with Turkish labor standards, relevant ILO standards and EBRD's Performance Requirement 2.

AMI will implement the necessary procedures for the pre-qualification and performance monitoring system for long-term Goods Procurement and Service procurement during the construction and operation process. The pre-qualification procedure will be implemented before performance of the contracts and the performance measurements will be recorded in the framework of the periods to be specified in the contract. The criteria for performance measurement will be as follows:

- Conformity to the Delivery Period,
- The conformity of the quality of goods and services to the specifications specified in the contract,
- Conformity to the Occupational Health and Safety
- Conformity to Environmental Safety
- Compliance with EBRD and related legislation,

Selected Supplier / Contractor standards include:

**Staff Employment Standards of Supplier (s) / Contractor (s):** As a minimum, the AMI suppliers are required to maintain and implement policies to comply with Turkish laws and regulations, and prohibit the employment of forced, bonded or child labor, with a process for assuring compliance.

**Supplier (s) / Contractor (s) 's Human Rights Standards:** As a minimum, it is necessary to create a process for creating and implementing policies that respect basic human rights and dignity without any discrimination, including the rights to life, liberty, and security of person, freedom from slavery and cruelty, and equal protection under applicable Turkish and International laws and constitutions and a process to assure compliance.

**Health and Safety Standards of Supplier (s) / Contractor (s):** As a minimum, the AMI suppliers are required to be in compliance with all Health, Safety and Environment (HSE) standards.

**Supplier (s) / Supplier (s) Community Relevant Standards:** At a minimum, AMI suppliers must demonstrate an organizational commitment to a responsible and productive relationship with the community. All Suppliers / Contractors / Subcontractors must be approved in writing by the Supply Chain Division team and also meet the contract's HSE and quality requirements.

## 6. TRAINING

Acacia Mining Company will ensure that all of its employees and the employees of its Contractors undergo compliance training and thus become familiar with the regulations and procedures of the company. This will include cultural sensitivity training to ensure that employees and contractors are respectful to local communities.

AMI will provide access to vocational training that is intended to increase local capacity and fulfil the requirements of the company.

Human Resources Manager will be responsible for execution and organization of training programs in collaboration with local organizations, and authorized bodies when necessary.

Before the development of a training and awareness program, a needs analysis will be conducted. The needs analysis will be based on requirements of this Plan. It involves a basic assessment of the knowledge and skills of the people involved in training implementation.

By analysing the needs analysis results according to the Training and Development process, the training and awareness program will at least cover the areas summarized in Table 7.1.

**TABLE Training Plan**

WHAT	WHO	WHEN	FREQUENCY
Mitigation measures including all procedures	<ul style="list-style-type: none"> <li>Supervisors and senior camp management</li> <li>Personnel who will be involved in training, reporting or monitoring</li> </ul>	Prior to work	Once prior work
Workplace induction including: <ul style="list-style-type: none"> <li>Payrollcheck</li> <li>Discipline Implementation Procedure</li> <li>Cultural awareness</li> <li>Code of conduct</li> </ul>	All workers	Prior to work	Annually
Camp induction including: <ul style="list-style-type: none"> <li>Rules and regulations</li> <li>Code of conduct</li> <li>Grievance Mechanism</li> </ul> Health, safety and security	All workers live in camps	Prior to work	Annually
Monitoring	Personnel who will be conducting monitoring events	Before monitoring commences	Annually
Reporting and performance indicators	Personnel who will be compiling reports relating to labor and working conditions	Before reporting commences	Annually
Human rights awareness	Executive Management, Supervisors, security personnel (staff and contracted)	Prior to commencement of work	As required by changes in training materials or awareness topics

## 7. AUDIT AND REPORTING

Conformance with this plan will be subject to internal inspection and audit on a quarterly basis (during construction) and annual basis during operations. Any incidents identified during these inspections will be reported to the incident management system of AMI. Conformance will be monitored in accordance with the AMI ESMS (Monitoring and Evaluation). All incidents and non-conformances will be reported as per the requirements of the AMI ESMS as described in the ESMS Framework Document.

### Contractor Auditing

Contractors will be subject to inspection and audit by AMI prior to a contractor's initial appointment and then on a quarterly basis as outlined in the Contractor Management Framework during construction and on annual basis during operations .

### External Auditing

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



Ministry of Labor may also conduct regulatory audits to mine construction and operations in line with the in country regulations.

## **8. REFERENCES**

- Republic of Turkey Ministry of Environment and Urbanization - EIA Guidelines - Quarry Operation and Ore Preparation - Processing Plants, June 2009
- International Labor Organization (ILO) - ILO Declaration on Fundamental Principles and Rights at Work, June 1998
- EBRD Performance Requirements-2, May 2014
- Human Resources Policy (ACACIA-2017-HR-POL-175)
- IFC Performance Requirements-2, January 2012
- Turkish Labor Law