



Environmental & Social Management System

Community Health, Safety & Security Management Plan

Community Health, Safety and Security Management Plan		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CHSS-PLN-001	Rev: 1

TABLE OF CONTENTS

1	INTRODUCTION	3
1.1	DOCUMENT NUMBER	3
1.2	PURPOSE	3
1.3	APPLICATION	3
1.4	COMMENCEMENT	3
1.5	AUTHORITY AND MANAGEMENT	3
2	SCOPE	4
2.1	SCOPE OF THIS MANAGEMENT PLAN	4
2.2	OVERLAPS WITH OTHER MANAGEMENT PLANS	4
3	ROLES AND RESPONSIBILITIES	5
3.1	KEY ROLES AND RESPONSIBILITIES FOR MANAGEMENT PLAN IMPLEMENTATION	5
3.2	KEY INTERFACES	5
4	PROJECT STANDARDS	6
4.1	APPLICABLE TURKISH NATIONAL STANDARDS	6
4.2	TURKISH EIA REQUIREMENTS	6
4.3	OTHER COMMITMENTS TO AND REQUIREMENTS OF TURKISH GOVERNMENT AUTHORITIES	6
4.4	APPLICABLE INTERNATIONAL STANDARDS AND GUIDELINES	7
4.5	APPLICABLE CENTERRA AND OMAS STANDARDS, POLICIES AND PROCEDURES	8
4.6	OTHER INDUSTRY GUIDELINES WITH WHICH OMAS HAS COMMITTED TO ALIGN WITH	9
4.7	SUMMARY OF APPLICABLE PROJECT STANDARDS	10
5	MITIGATION MEASURES AND MANAGEMENT CONTROLS	10
5.1	SUMMARY	10
6	IMPLEMENTATION SCHEDULE	13
6.1	REVIEW AND REVISION OF THIS MANAGEMENT PLAN	13
7	MONITORING	13
7.1	OVERVIEW OF MONITORING REQUIREMENTS	13
7.2	KEY MONITORING ACTIVITIES	13
7.3	KEY PERFORMANCE INDICATORS	14
8	TRAINING	14
8.1	OVERVIEW	14
8.2	INDUCTION TRAINING	14
8.3	JOB-SPECIFIC TRAINING	14
8.4	OTHER TRAINING REQUIREMENTS	15
9	AUDIT AND REPORTING	15
9.1	AUDITING	15
9.2	EXTERNAL AUDITING	15
9.3	RECORD KEEPING	15
10	DOCUMENT CONTROL	15
Tables		
	Table 1: Key Roles and Responsibilities	5
	Table 2: Key Management Controls	11
	Table 3: Key Monitoring Measures	13
	Table 4: Key Performance Indicators and monitoring measures	14

Community Health, Safety and Security Management Plan

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CHSS-PLN-001

Rev:
1

1 INTRODUCTION

1.1 Document Number

This document is the Community Health, Safety & Security (CHSS) Management Plan for the Öksüt Gold Project. The document reference number for this Management Plan is OMAS-ESMS-CHSS-PLN-001.

1.2 Purpose

The purpose of this Management Plan is to:

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

1.3 Application

The requirements set out in this Management Plan apply to all OMAS activities throughout the lifecycle of the Öksüt Gold Project, including those carried out by contractors.

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

1.4 Commencement

This Management Plan applies from 1 April 2016.

1.5 Authority and Management

The OMAS General Manager approved this Management Plan on 1 March 2016.

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

Any requests for changes to this Management Plan must be addressed to the owner of this Management Plan and will be subject to appropriate review and approval processes as outlined in the Management of Change (MOC) procedure set out in the ESMS Framework.

Community Health, Safety and Security Management Plan

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CHSS-PLN-001

Rev:
1

2 SCOPE

2.1 Scope of this Management Plan

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

This document outlines OMAS's commitment and approach to mitigating community health safety and security risks that may arise as a direct or indirect result of the OMAS project. Key risks identified in the ESIA and addressed by this Management Plan include:

- Change in traffic density impacting other road users;
- Change in community expectations related to cyanide use;
- Introduction of new security presence and security personnel;
- Increased potential for communicable disease.

2.2 Overlaps with other Management Plans

This Management Plan is part of the overall suite of Management Plans developed for the OMAS Project and as described in the Environmental and Social Management Framework (OMAS-ESMS-001).

This Management Plan has overlaps and cross-linkages to a number of other Management Plans which have community health safety and security implications, including:

- Emergency Response Plan (OMAS-ESMS-ERP-PLN-001), particularly in relation to responding to off-site accidents and incidents.
- Hazardous Materials Management Plan (OMAS-ESMS-HM-PLN-001), particularly in relation to the transport, storage, use and disposal of hazardous materials.
- Cyanide Management Framework (OMAS-ESMS-CY-PLN-001), particularly in relation to the transportation and storage of cyanide. A Cyanide Management Plan will be prepared by OMAS and its selected supplier in accordance with the International Cyanide Management Code and Turkish regulatory requirements prior to cyanide being transported to and stored on site.
- Transport Management Plan (OMAS-ESMS-TMP-PLN-00), particularly in relation to management of impacts using the new access road and public roads.
- Air Emissions Management Plan (OMAS-ESMS-AQ-PLN-001), particularly in relation to management of community exposure to dust generated by OMAS activities.
- Noise & Vibration Management Plan (OMAS-ESMS-NV-PLN-001), particularly in relation to management of community exposure to noise generated by OMAS activities.
- Water Resources Management Plan (OMAS-ESMS-WR-PLN-001), particularly in relation to the protection of potable drinking water supplies.
- Mine Closure Plan (OMAS-ESMS-CP-PLN-001), particularly in relation to protection of local communities from physical hazards remaining once the mine has stopped operating.
- Labour Management Plan (OMAS-ESMS-LM-PLN-001), particularly in relation to the behaviour of OMAS workers.
- Stakeholder Engagement Plan (OMAS-ESMS-SEP-PLN-001), particularly in relation to communication with local communities and stakeholders.
- Security Management Plan, particularly in relation to the management of security risks in Turkey and at the local level.

Community Health, Safety and Security Management Plan		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CHSS-PLN-001	Rev: 1

3 ROLES AND RESPONSIBILITIES

3.1 Key Roles and Responsibilities for Management Plan Implementation

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

Table 1: Key Roles and Responsibilities

Role	Responsibilities
OMAS General Manager	<ul style="list-style-type: none"> Approval of this Plan and resources required for implementation.
OMAS Director External Relations & Sustainability	<ul style="list-style-type: none"> Ensure Project compliance with the Project Standards and other requirements set out in this Plan. Overall responsibility for Plan scope and implementation. Development, monitoring and revision of this Plan.
OMAS Health, Safety, Environment and Training Manager	<ul style="list-style-type: none"> Ensure that relevant activities are undertaken in accordance with this Management Plan and related procedures.
OMAS Community Relations Manager	<ul style="list-style-type: none"> Timely implementation of this Plan, including coordination with governmental organisations and other stakeholders.
Operational Department Managers and Principal Contractors	<ul style="list-style-type: none"> Ensure that relevant activities are undertaken in accordance with this Management Plan and related Procedures. Ensure that department personnel are fully trained in air quality management practices. Ensure incident¹ investigations are undertaken and reported.
Workplace Supervisors / Superintendents	<ul style="list-style-type: none"> Provide oversight and conduct routine work area inspections to ensure relevant activities are in accordance with this Management Plan and related Procedures. Report all hazards, non-conformances and incidents.
All employees and contractors	<ul style="list-style-type: none"> Report any activities which are causing unnecessary emissions or potential community risks.

A number of organisations exist that work to improve the health of local communities. As set out in this Management Plan, OMAS will closely collaborate with these partners to protect and improve the health of local people.

3.2 Key Interfaces

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

- OMAS Project Manager, particularly in relation to the safe implementation of off-site activities during construction.
- OMAS Mine Operations Manager, particularly in relation to the safe implementation of off-site activities during operation.

¹ Incidents are defined by reference to the Project finance documents and OMAS ESMS Framework.

Community Health, Safety and Security Management Plan

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CHSS-PLN-001

Rev:
1

- OMAS Health, Safety, Environment and Training Manger, particularly in relation to community safety management, security and worker training.
- OMAS Community Relations Manager, particularly in relation to communication with local communities concerning community health, safety and security issues.
- OMAS Procurement Manager, particularly in relation to selection of appropriately qualified chemical and fuel suppliers.

4 PROJECT STANDARDS

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

- applicable Turkish Standards;
- Turkish EIA requirements;
- other commitments to and requirements of Turkish Government authorities;
- applicable international standards and guidelines;
- applicable Centerra and OMAS standards, policies and procedures;
- other industry guidelines with which OMAS has committed to comply or align with.

4.1 Applicable Turkish National Standards

- Communiqué on Major Accident Prevention Policy Documents (Official Gazette 29435, 4 August 2015).
- Regulation on Prevention and Effect Control of Major Industrial Accidents (Official Gazette 28867, 30 December 2013).

4.2 Turkish EIA requirements

There are no specific requirements in the EIA and associated Permits submitted for the OMAS project directly related to community health safety and security.

4.3 Other Commitments to and Requirements of Turkish Government Authorities

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

The Regulation classifies mining waste into three categories: hazardous, non-hazardous and inert waste. Processes and requirements for disposing mining waste depend on its classification. The Regulation was prepared by the Ministry of Environment and Urban Planning, in line with the EU Directive on Mining Waste 2006/21/EC.

Turkish Environmental, Health and Safety Standards

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

- Regulation for Manual Handling Operations in Workplaces
- Regulation on Health and Safety Measures in Working with Chemicals
- Regulation on Personal Protective Equipment

Community Health, Safety and Security Management Plan

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CHSS-PLN-001

Rev:
1

- Health and Safety Regulation for Mining Works
- Regulation on Health and Safety Signs
- Regulation on Dust Control
- Regulation on Occupational Health and Safety in Construction Works
- Regulation on the Protection of Workers from Noise Related Risks
- Regulation on Protection of Workers from the Risks of Explosive Atmospheres
- Regulation on the Protection of Workers from Vibration Related Risks
- Regulation on Procedures and Principles of Occupational Health and Safety Training of Workers
- Regulation on Health and Safety Restrictions of Equipment Usage in Workplaces
- Regulation on Duty, Authority and Responsibility and Training of Occupational Safety Specialists
- Regulation on Risk Assessment Regarding Occupational Health and Safety
- Regulation on Emergency Situations in Workplaces

The 1982 Constitution recognises the right of all Turkish citizens to a healthy environment, as well as the duty of the State and of citizens to upgrade the environment, protect environmental health and prevent pollution. Turkey is a party to all key international environmental conventions that provide appropriate policy frameworks and promote cooperation and coherent action at global, regional and national levels to address environmental problems.

4.4 Applicable International Standards and Guidelines

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

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

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

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

The Voluntary Principles on Security and Human Rights

The *Voluntary Principles on Security and Human Rights* (VPs) were introduced in 2000 to provide guidance to extractives companies on maintaining the security of their operations in a manner that respects human rights and fundamental freedoms.² The Voluntary Principles fall into three main categories:

² Source URL: <http://www.voluntaryprinciples.org/principles/introduction>

Community Health, Safety and Security Management Plan		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CHSS-PLN-001	Rev: 1

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

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

OMAS will align its activities to the Voluntary Principles

Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework (Human Rights Council, UN 2011)

The aim of the Principles is to guide governments, corporations, and other relevant stakeholders in ensuring that business operations around the world do not negatively impact and abuse human rights. The Principles are made up of three pillars: protect, respect and remedy: the State duty to protect human rights, the corporate responsibility to respect human rights and the right of victims to access an effective remedy.

The corporate responsibility to Respect requires a company to:

- Avoid causing or contributing to any adverse human rights impact through its own activities, and address any impact when it does occur;
- Seek to mitigate or prevent any impact that is directly linked to its operations, products and services through its business relationships.

OMAS will align its activities with the UN Guiding Principles.

4.5 Applicable Centerra and OMAS Standards, Policies and Procedures

OMAS Sustainability Policy

The OMAS Sustainability Policy (OMAS-HSEC-POL-002) commits OMAS to undertake the following:

- To listen to and engage with host communities in a collaborative, transparent manner to build mutual trust and understanding.
- To work proactively with communities to identify and manage social risks, impacts and obligations.
- To help foster a stable, healthy and safe environment in which to live and work.
- To develop partnerships with host communities, governments, employees, contractors and others to promote sustainable social and economic development.
- To respect the fundamental human rights of all stakeholders with whom we interact.
- To manage grievances in a fair, timely and consistent manner.
- To take into account the special aspirations, needs and concerns of Indigenous Peoples, women, children and vulnerable groups within our sphere of influence.
- To leave a lasting positive legacy by working with local stakeholders to prepare for our eventual departure and the closure of our operations.

Community Health, Safety and Security Management Plan

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CHSS-PLN-001

Rev:
1

- To monitor and continually seek to improve our community relations performance in order to create value for our stakeholders and shareholders alike.

OMAS Health & Safety Policy

The OMAS Health, Safety & Environment Policy (OMAS-HSEC-POL-001) commits OMAS to undertake the following:

- implement and maintain a formal health, safety and environmental management system;
- identify the significant health and safety hazards and risks associated with our activities;
- set objectives and targets so as to improve continually our health, safety and environmental management and performance;
- identify the potential for incidents, and emergency situations and develop, maintain and test emergency response plans which provide for the protection of the environment, the health and safety of our employees, the public, and the communities adjacent to our operations;
- undertake constructive dialogue with the communities located near our operations regarding safety issues;
- handle and dispose of our wastes responsibly to avoid, reduce or control pollution;
- decommission and reclaim our sites in a planned and timely manner;
- conduct regular audits to assess and ensure conformance to this policy;
- engage in constructive communication of this policy with all employees and relevant contractors and suppliers so they are aware of, and able to comply with their health, safety and environmental responsibilities in a manner appropriate to their role in the organization, and to encourage them to make contributions to OMAS's health, safety and environmental management;
- provide employees at all levels with appropriate training so as to allow them to carry out their health , safety and environmental duties and responsibilities;
- ensure the participation of employees in the development and implementation of health, safety and environmental programs and procedures associated with their work places;
- provide adequate and appropriate resources to implement this policy;
- make this policy available to the public

The OMAS Project has also developed the OMAS Code of Ethics (OMAS-GEN-POL-001), which aims to ensure a safe and secure working environment at OMAS working areas whether these are inside or outside the EIA Permitted Area.

4.6 Other industry guidelines with which OMAS has committed to align with

UNEP APELL for Mining

The UNEP APELL "*Guidance for the Mining Industry in Raising Awareness and Preparedness for Emergencies at Local Level*" also provides applicable guidelines for emergency preparedness and response for mining operations. This guidance is focused on environmental and community impacts resulting from mining operations such as tailings dam failure, collapse of waste heaps. This guidance has been taken into account in the Emergency Response Plan.

International Cyanide Management Code

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

Community Health, Safety and Security Management Plan

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CHSS-PLN-001

Rev:
1

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

4.7 Summary of Applicable Project Standards

OMAS will comply with the more stringent of national standards and applicable lender standards, with the more stringent standards representing the Project Standards. The Project will also align with the *Voluntary Principles* as part of the Project Standards.

Applicable Project Standards are summarised below.

Standard	Scope
EBRD Performance Requirement 2: Labour and Working Conditions	<ul style="list-style-type: none"> • Set a standard of practice and behaviour for the security personnel, guided by the principle of proportionality good international practice
EBRD Performance Requirement 4: Health and Safety	<ul style="list-style-type: none"> • Risk assessment, mitigation and management related to community health, safety and security
The Voluntary Principles on Security and Human Rights UN Guiding Principles on Human Rights	<ul style="list-style-type: none"> • Risk assessment and management of the use of security measures related to personnel, local communities and assets as well as protection of human rights
International Cyanide Management Code	<ul style="list-style-type: none"> • Cyanide transport, storage and use. Emergency response planning.

5 MITIGATION MEASURES AND MANAGEMENT CONTROLS

5.1 Summary

This Management Plan may be supported by additional procedures and guidelines, which present more details on specific aspects of the day-to-day management activities at OMAS:

The table below presents the key management controls that OMAS will implement.

Community Health, Safety and Security Management Plan

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CHSS-PLN-001

Rev:
1

Table 2: Key Management Controls

ID	Topic/Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of Verification
CHSS 01	Change in traffic density impacting other road users	Construction Operations Closure	<ul style="list-style-type: none"> • Communicate transport routes and predicted schedule to communities. • Identify and install all necessary warning signage on public roads. • Develop and implement a Traffic and Transport Hazards Training Programme for all employees and contractors. • Identify and install all necessary traffic warning signage within the mine working areas. • Prepare and deliver driver safety training for drivers and operators. • Develop and implement a Road Safety Awareness Programme for local communities. • Support Construction and Operation staff in the planning and coordination of traffic management activities through finalisation of a Traffic Management Plan. • Maintain delivery logs to manage the day-to-day entry of vehicles onto the site. • Deploy “spotters” for plant and machinery operating in building construction areas. • Require contractors to develop appropriate Emergency Response Plans for off-site activities. • Maintain vehicles in periodic verification inspections will be undertaken. • Set zero limit for alcoholic beverages and illegal drugs. 	Project Manager (Construction) Mine Operations Manager Director, External Affairs and Sustainability Health, Safety, Environment & Training Manager	Review of records Grievance Procedure
CHSS 02	Change in community expectations	Construction Operations	<ul style="list-style-type: none"> • Conform to the International Cyanide Management Code (ICMC). • Develop emergency response strategies prior to first 	Health, Safety, Environment & Training Manager	Cyanide Management Plan Document review

Community Health, Safety and Security Management Plan

Effective Date:
01.04.2016

Document Number:
OMAS-ESMS-CHSS-PLN-001

Rev:
1

ID	Topic/Aspect	Applicability/Activity	Control Description	Responsible Parties	Means of Verification
	related to cyanide use		<ul style="list-style-type: none"> shipment. • Selection of qualified suppliers. • Undertake regular emergency preparedness training and drills. • Conduct community-level trainings on the Cyanide Management Plan. 	Procurement Manager	Review of training records
CHSS 03	Introduction of new security presence leading to conflict	Construction Operations	<ul style="list-style-type: none"> • Align with the Voluntary Principles on Security and Human Rights. • Conduct risk assessment prior to the appointment of security personnel. • Conduct reference checks on candidates. • Training in the Code of Ethics specific to security personnel. • Training on conflict resolution, crowd management, restraint and cautious exercise of security activity and appropriate use of force. • Monitoring of contractor performance. 	Director, External Affairs and Sustainability	Review of records Grievance Procedure
CHSS 04	Increased potential for communicable diseases	Construction Operations	<ul style="list-style-type: none"> • Pre-employment health screening. • Training on STIs. • Support local public health campaigns. • Awareness-raising on health lifestyles. 	Director, External Affairs and Sustainability Health, Safety, Environment & Training Manager	Review of records Grievance Procedure

Community Health, Safety and Security Management Plan		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CHSS-PLN-0001	Rev: 1

6 IMPLEMENTATION SCHEDULE

6.1 Review and Revision of this Management Plan

This Management Plan will be reviewed on a minimum of a six monthly basis during construction and commissioning. During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs of OMAS. Revision of this Management Plan will be the responsibility of the OMAS Director External Relations and Sustainability, who is custodian of this Plan.

If material changes to operating procedures are required (as identified through the Management of Change procedure contained within the OMAS ESMS Framework) this Management Plan may be updated on an “as required” basis.

Any revisions to this Management Plan will be uploaded to the OMAS Document Control Centre to ensure that all OMAS staff has access to the latest version of this Management Plan.

7 MONITORING

7.1 Overview of Monitoring Requirements

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

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

7.2 Key Monitoring Activities

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

Table 3: Key Monitoring Measures

ID	Topic/Aspects	Methods	Periodicity	Location
CHSSm01	Community Safety	<ul style="list-style-type: none"> Number of recorded security incidents involving OMAS workers and members of the local population. 	Annual	Mine affected neighbourhoods
CHSSm02	Traffic and transport	<ul style="list-style-type: none"> Number of community members involved in road safety training sessions. 	Annual	Mine affected neighbourhoods
CHSSm03	Community health changes	<ul style="list-style-type: none"> District key health statistical analysis. Number of health promotion activities run with local community. 	Annual	Mine affected neighbourhoods
CHSSm04	Health service capacity	<ul style="list-style-type: none"> Number of training sessions runs with local health service providers. 	Annual	Mine affected neighbourhoods

Community Health, Safety and Security Management Plan		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CHSS-PLN-0001	Rev: 1

7.3 Key Performance Indicators

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

Table 4: Key Performance Indicators and monitoring measures

ID	KPI	Target
C-KPI 01	Total number of non-compliances with community health safety & security measures identified in <i>Table 2</i> of this Plan.	Minimise and target zero per annum.
C-KPI 02	Number of communicable and non-communicable diseases and injuries.	No significant increase in communicable and non-communicable disease and injury rates per 1,000 residents per annum.
C-KPI 03	Number of community health safety & security complaints from local communities as recorded in the grievance management system.	Minimise and continued improvement in number of community health safety and security related complaints.
C-KPI 04	Number of reported community health & safety incidents	Minimise and target zero per annum.

8 TRAINING

8.1 Overview

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

8.2 Induction Training

All employees of OMAS and Contractors working at the Project will be provided with general induction, site specific induction and a broad range of health, safety and environmental awareness training.

Appropriate Personal Protective Equipment (PPE) will be made available to personnel if required. All relevant personnel will be trained in the use and maintenance of protective equipment.

Worker induction will include awareness training on STIs and other communicable disease prevention.

8.3 Job-Specific Training

Additional specialist training is to be provided to the security personnel (including on the human rights and the use of force), drivers (as outlined in the Transport Management Plan OMAS-ESMS-TMP-PLN-001), and key personnel involved in activities that are conducted off-site, e.g. along the transport route. Once developed, employees and contractors will receive participate in the Traffic and Transport Hazards Training Programme. Drivers and operators will be trained in both offensive and defensive driving skills. This will be mandatory for all OMAS and Principal Contractor drivers working at the site. Chemical Suppliers will provide evidence to OMAS of similar training for drivers;

Specialist training shall be provided to plant operators and key personnel involved in activities which involve off-site land clearance, construction or materials handling activities, including training for relevant staff on the Cyanide Management Plan.

Community Health, Safety and Security Management Plan		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-CHSS-PLN-0001	Rev: 1

8.4 Other Training Requirements

General aspects of community health, safety and security issues will be included in induction training to be provided to all employees and contractors.

Various community-level trainings will be provided, including road safety awareness training. The training will target vulnerable groups such as children. Community-level training will also be provided for on the Cyanide Management Plan.

9 AUDIT AND REPORTING

9.1 Auditing

Daily inspections will be carried out by operational area superintendents / supervisors covering a broad range of operational aspects, including community health safety and security issues as appropriate to activities outside the fence line.

Any incidents identified during these inspections will be reported to the incident management system (Component 10 of the ESMS).

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

All incidents and non-conformances will be reported as per the requirements of the OMAS ESMS as described in the ESMS Framework Document (OMAS-ESMS-001).

Aspects of community, health and safety are subject to regulatory audits.

9.2 External Auditing

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

9.3 Record Keeping

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

10 DOCUMENT CONTROL

File Name	Community Health, Safety and Security Management Plan
Document #	OMAS-ESMS-CHSS-PLN-001
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