



Environmental & Social Management System

Cultural Heritage Management Plan

Cultural Heritage Management Plan		
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1 INTRODUCTION

1.1 Document Number

This document is the Cultural Heritage Management Plan for the Öksüt Gold Project. The document reference number for this Management Plan is OMAS-ESMS-CH-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 the changes to this Management Plan.

1.4 Commencement

This Management Plan applies from 1 April 2016.

1.5 Authority and Management

The OMAS Executive Committee 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.

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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.

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).

Cultural Heritage – Definition

OMAS uses the definition of cultural heritage outlined in the EBRD's Performance Requirement 8 *Cultural Heritage*. The Standard defines cultural heritage as:

A group of resources inherited from the past which people identify, independently of ownership, as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions.

Types of Cultural Heritage Covered by this Plan

Intangible Cultural Heritage

Intangible cultural heritage means the practices, representations, expressions, knowledge, skills – as well as the instruments, objects, artefacts and cultural spaces associated therewith – that communities, groups and, in some cases, individuals recognise as part of their cultural heritage and which are transmitted from generation to generation

Tangible Cultural Heritage

Tangible (physical) cultural heritage concerns movable or immovable objects, sites, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance

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.

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

- the Stakeholder Engagement Plan (OMAS-ESMS-SEP-PLN-001), particularly in relation to community consultation requirements.
- the Contractor Management Framework (OMAS-ESMS-CM-PLN-001), particularly in relation to contractor cultural heritage management plan requirements.

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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 Affairs & 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 Environment Coordinator	<ul style="list-style-type: none"> Conduct of cultural heritage assessment processes. Ensuring activities do not disturb cultural heritage sites without appropriate approvals. Investigation, reporting and follow up of unauthorised site disturbances or procedural breaches. Ensuring that site personnel involved in projects that may disturb cultural heritage receive appropriate training and inductions so that they understand their cultural heritage responsibilities. Document management. Management of statutory or policy changes.
OMAS Community Relations Manager	<ul style="list-style-type: none"> Coordination with implementing organisations and other stakeholders.
Contractors	<ul style="list-style-type: none"> Comply with OMAS cultural heritage management procedures. Comply with OMAS cultural heritage management requirements set out in contractor contracts.
All Workers	<ul style="list-style-type: none"> Be familiar with OMAS cultural heritage management procedures through induction training and other training provided.

Training will be provided to all staff and contractors as part of the induction process with cultural heritage awareness training.

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:

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- OMAS Project Manager, particularly in relation to the chance finds procedure for all activities during construction.
- OMAS Mine Operations Manager, particularly in relation to the chance finds procedure during operation;

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.

4.1 Applicable Turkish National Standards

The Law on the Conservation of Cultural and Natural Property (TLCCNP, Law No: 2863) is a mandatory guide for the extractive sector.

The objective of the TLCCNP is to set the definitions regarding the movable and immovable cultural and natural assets that shall be protected; to arrange the procedures and activities to be performed and to establish the formation and duties of the organization that will enforce the required principles and implement decisions on this subject.

Article 3 of the TLCCNP provides the following definitions:

- Cultural properties are all over-ground, underground or submarine movable and immovable properties related with science, culture, religion and fine arts belonging to prehistoric and historic periods.
- Natural properties are the over-ground, underground or submarine properties that belong to geological, prehistoric and historical periods and that shall be protected because of their rarity, features and values.

Article 4 of Law regulates the Obligation to inform. In case of chance find of movable and immovable cultural and natural properties there is an obligation to inform the nearest Museum Directorate, Muhtar, or civil administrative bodies, not later than 3 days after the find. The Muhtar should inform the nearest civil administrative body within 24 hours of the notification. The civil administrative office will inform the Ministry of Culture and Tourism (MoCT) and nearest Museum Directorate within 10 days of an official application. The General Directorate for Cultural Heritage and Museums of MoCT and the relevant Regional Cultural Heritage Preservation Council (RCHPC) are responsible for the registration of the find.

Article 5 states that cultural and natural properties shall be treated as state assets.

Article 6 defines immovable cultural and natural heritage properties and provides a detailed list of them.

Article 7 states that the relevant RCHPC Directorate is responsible for registration of cultural heritage properties.

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Article 8 of the Law regulates the taking of decisions for protection areas of cultural heritage properties. This article states that RCHPCs have the power of taking decisions for the protection areas of cultural heritage properties and they decide about the possibility of construction and facilities inside their protection areas.

Article 9 of the Law states that construction and physical intervention to the immovable cultural heritage properties is forbidden without the permission and decisions of the RCHPC. Restoration, construction, drilling, partial or total destruction, and excavation are considered as physical interventions.

The above mentioned articles of the TLCCNP provide a general framework for the potential archaeological sites located within the Öksüt property. The regulations which provide details to the Law should also be considered together with the related decisions of the High Council for Preservation of Cultural Heritage Properties.

4.2 Turkish EIA requirements

There are no specific requirements in the EIA submitted for the OMAS project directly related to cultural heritage.

4.3 Other Commitments to and Requirements of Turkish Government Authorities

None applicable.

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 8 *Cultural Heritage* sets out requirements with regard to Cultural Heritage. OMAS will comply with the requirements of EBRD Performance Requirement 8 when implementing its policies.

Key requirements include:

- To identify and evaluate the risks and potential impacts to the cultural heritage within the Project area during the design, construction, operation, and decommissioning of the Project and to establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts. These measures will favour the prevention or avoidance of risks and impacts over minimisation and reduction.
- Where the Project or stage of the project poses material risks to or potential adverse impacts on cultural heritage, to disclose applicable project-related information to enable the affected communities and relevant government agencies to understand these risks and potential impacts, as well as the proposed prevention, mitigation measures, as appropriate.

4.5 Applicable Centerra and OMAS Standards, Policies and Procedures

OMAS's Sustainability Policy includes the Company's commitment to protecting cultural resources, and sets out the goals that form the basis for all cultural heritage protection activities conducted by the Company.

The Cultural Heritage Management Procedure (OMAS-HSEC-PRC-007) includes the OMAS Chance Finds Procedure.

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4.6 Other industry guidelines with which OMAS has committed to comply

Other relevant guidelines include those of the United Nations Educational, Scientific, and Cultural Organization (UNESCO). Turkey ratified "The Convention Concerning the Protection of the World Cultural and Natural Heritage" (The World Heritage Convention). The signatories to this Convention have agreed "to ensure that effective and active measures are taken for the protection, conservation and presentation of the cultural and natural heritage" on their territories.

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.

Applicable Project Standards are summarised below.

Standard	Scope
EBRD Performance Requirement 8: Cultural Heritage	<ul style="list-style-type: none"> Risk assessment, mitigation and management related to cultural heritage
The Convention Concerning the Protection of the World Cultural and Natural Heritage (The World Heritage Convention)	<ul style="list-style-type: none"> Protection, conservation and presentation of cultural and natural heritage
Turkish Law TLCCNP	<ul style="list-style-type: none"> Identification, designation, mitigation and management of cultural heritage

Cultural Heritage Management System

OMAS has established a Cultural Heritage Management Procedure (OMAS-HSEC-PRC-007) (CHMP), developed with Centerra to conform to current Group guidance. The CHMP involves a set of procedures and processes to ensure the management and protection of cultural heritage and enable OMAS to meet its cultural heritage management obligations and commitments. These processes and procedures are set out in the OMAS CHMP procedures guide.

The main CHMP processes and procedures include:

- Community consultation
- Cultural heritage assessments
- Cultural heritage site protection plans
- Cultural heritage management and mitigation measures
- Training
- Monitoring and incident management process (including *Chance Finds Procedure*)

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5 MITIGATION MEASURES AND MANAGEMENT CONTROLS

5.1 Summary

Potential cultural heritage impacts will occur predominantly in the construction phase, because land clearance and other intrusive activities are required to prepare the site and build the project facilities. Although construction will be phased, it is understood that the maximum extent of the facility footprint will be determined in the first year.

Each phase of Project implementation presents different potential risks to cultural heritage/archaeological sites, and these are summarised for the construction, operations and closure/post closure phases.

Table 2. Summary of potential risks to cultural heritage

Phase	Impact
Construction	<ul style="list-style-type: none"> • Extensive excavation will arise during the Project as a result of open pit mining, Heap Leach Facility (HLF), Waste Rock Dump (WRD) and associated facilities and buildings. • The pits, HLF, WRD and facilities and building areas have been surveyed as part of the pre-construction archaeological field work conducted between 2012 and 2014. • Disturbance of known archaeological sites is not expected. • Issues arising during construction should be limited as the majority of the project area has now been subject to survey.
Operations	<ul style="list-style-type: none"> • 'Post construction' excavation should not arise during routine operations outside the pit area. • If sites are threatened by operations, either directly or indirectly, they will be surveyed prior to disturbance, if impacts cannot be avoided by other mitigation measures. • If the sites are not threatened, then the principle of 'preservation in situ wherever possible', which is upheld in all relevant legislation, on both a national and international level, would indicate that no further excavation should take place.
Closure	<ul style="list-style-type: none"> • This phase is not expected to involve additional impacts to archaeological/cultural sites as disturbance of new areas should not be required. • Reclamation activities that may require consideration of the potential for chance finds/new discoveries of archaeological/cultural sites.

The control measures and Cultural Heritage programme described below have been developed in response to the risks identified by OMAS through the ESIA process.

5.2 Plan Goals and Objectives

The overarching goals of the OMAS approach to cultural heritage are to:

- minimise and mitigate cultural heritage impacts that are directly and indirectly stimulated by OMAS's activities;
- establish effective plans and procedures for managing archaeological sites and cultural assets in the Öksüt area, including potential Chance Finds during construction and operation activities;

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- define OMAS requirements and procedures to guide the Project/Operation Management Team and other Project contractors.

These objectives will be pursued through implementation of this Management Plan, and will be measured and evaluated through the key performance indicators detailed in *Section 7.2* below.

5.3 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 Project.

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Table 3: Key Management Controls

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
CH 01	Loss of Cultural Heritage sites and/or objects	Construction Operations	<p>Implement OMAS CHMP procedures. Specifically:</p> <ul style="list-style-type: none"> • Implementation of the Chance Find Procedure • Monitoring/"watching briefs" conducted at specific construction and other sites • Consultation with local communities related to cultural resources • Communication and cooperation with the Contractors and the Kayseri Museum and/or other appropriately qualified archaeological specialists. • The Cultural Heritage Management Procedure is to apply and be made available to Contractor staff and their subcontractors, so the Plan is recognised, adopted and implemented by Contractors prior to the commencement of Construction or Operations work. 	<p>Director, External Affairs & Sustainability</p> <p>Environment Coordinator</p> <p>Project Manager</p> <p>Mine Operations Manager</p> <p>Contractors</p>	Records review

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6 OMAS Chance Finds Procedure

The Chance Finds Procedure is summarised below and are set out in the Cultural Heritage Management Procedure (OMAS-HSEC-PRC-007).

6.1 Initial Response by OMAS

- **Action 1:** In case of the discovery of any archaeological deposit, all construction activity in the vicinity of the find will cease immediately.
- **Action 2:** The OMAS project manager will be notified and/or environmental department.
- **Action 3:** Take photographs or delineate the discovered find.
- **Action 4:** Record the find location, with all remains being left in place (not to be moved).
- **Action 5:** Secure the area to prevent any damage or loss of removable objects.
- **Action 6:** Contact an archaeologist from the regional university for further guidance.
- **Action 7:** Prepare the chance find form (Appendix 1).

6.2 Response by Archaeologist

The archaeologist will advise on further action either depending on the description of the find via telephone/email/fax or based on a site visit. If the archaeologist(s) approves the existence of the archaeological finds/remains/site, the OMAS site team should consider the possible strategies as suggested below:

Strategy 1: Avoidance through partial or complete project redesign or relocation

In case of the discovery of any archaeological deposit or find the statutory authorities (Kayseri Museum) must be informed by OMAS about the situation according to TLCCNP. This obligation continues even after the project redesign or relocation takes place. In all cases, the related state authority should be informed about the discovery of the archaeological deposit or find.

Strategy 2: Application of site protection measures

This option includes the application of site protection measures, such as fencing or barricades. The Turkish State is the sole owner of any archaeological chance find in accordance with TLCCNP, Law No: 2863 and the statutory authorities (Kayseri Museum/Kayseri Regional Council) will decide the geographical extent and the application of site protection measures.

Strategy 3: Salvage or emergency excavation

If OMAS cannot relocate or redesign the project this situation brings the necessity of salvage or rescue excavation operations. In this case the Kayseri Museum or Regional Council should be informed according to TLCCNP and an official application should be made. Following the official application, the decision of the related Regional Council should be waited for.

If the related Regional Council decides the necessity of salvage or of a rescue excavation for the continuation of the project, an excavation permit should be requested from the General Directorate for Cultural Heritage and Museums through the Kayseri Museum. The Kayseri Museum and the Kayseri Regional Council are official institutions of the General Directorate for Cultural Heritage and Museums under the Ministry of Culture and Tourism (MoCT) and excavation permits are directly provided by this General Directorate.

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Following the granting of the permission, archaeological excavations can be carried out under the direction of the Kayseri Museum with the participation of scientific consultants from the archaeology departments of the universities. After the completion of the archaeological excavations, the results should be submitted to the Kayseri Regional Council in order to have the final decision to resume the project.

6.3 Procedure on Discovering Possible Human Remains

Identification of human remains is straightforward if they are in the context of a grave or burial area. If a burial or grave is encountered the procedures that should be followed are not different from the archaeological find procedure according to article 6 of TLCCNP. Modern burials and forensic human remains should not be considered within the scope of the TLCCNP.

7 IMPLEMENTATION SCHEDULE

7.1 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) 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

8 MONITORING

8.1 Overview of Monitoring Requirements

Cultural heritage monitoring procedures shall be as follows:

- EPC and mine operation contractors shall report on a monthly basis to the OMAS Environment Coordinator on the implementation of cultural heritage management requirements during the construction and operation phase of the project, including:
 - “Watching briefs” they participate in at specific areas/construction sites;
 - The erection and maintenance of demarcation fencing around the site;
 - The protection of sites by careful siting of access routes or facilities;
 - Induction training including cultural heritage awareness given to staff and planned;
 - Cultural heritage-related complaints and actions taken;
 - Cases of damage to, or disruption of, cultural heritage properties and actions taken.

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- The OMAS Environment Coordinator will conduct routine inspections of site activities in consultation with the Construction Manager and Mine Operations Manager to assess the potential for chance finds at work sites and any other cultural heritage issues that may arise.
- The OMAS Environment Coordinator will conduct an inspection of any cultural heritage field activities and documentation that are implemented as a result of a chance find or other event that results in archaeological field work. The inspection shall include:
 - Details of all work specifications prepared and implemented;
 - Monitoring/"watching briefs" conducted at specific construction and other sites;
 - Consultation with local communities related to cultural resources;
 - Communication and cooperation with the Contractors and the Kayseri Museum;
 - How the Cultural Heritage Database is being maintained;
 - Information dissemination regarding cultural heritage;
 - Performance of the Contractors in managing cultural resources at specific construction sites;
 - Cultural heritage-related complaints and action taken; and
 - Cases of damage to, or disruption of, cultural heritage properties and actions taken.
 - The OMAS Environment Coordinator shall be responsible for record-keeping.

Regular reporting shall be undertaken via the Monthly Report that shall be prepared and submitted to the OMAS General Manager. Reporting shall include:

- A summary of activities undertaken during the reporting period;
- Any material deviations or non-compliances to the Cultural Heritage Management Plan;
- Planned activities during the next reporting period;
- Any other issues of concern.

8.2 Key Performance Indicators

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

Table 4: Key Performance Indicators and Monitoring Measures

ID	KPI	Target
CH-KPI 01	Reported non-compliances against the key management controls identified in this Plan per year	<ul style="list-style-type: none"> • Minimise number of reported non-compliances and target zero per year.
CH-KPI 02	Number of cultural heritage related complaints from local communities per year	<ul style="list-style-type: none"> • Investigate any complaints in relation to cultural heritage (desecration, disturbance, removal, trafficking of artefacts) and take appropriate action. • Provide rapid response to any complaints from local communities in relation to inappropriate

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ID	KPI	Target
		cultural behaviour by personnel. Investigate and take appropriate action within timeframe specified in OMAS grievance procedure.

8.3 Key Monitoring Activities

Key monitoring activities will focus on the topics and methods set out in Table 5 below.

Table 5: Key Monitoring Measures

ID	Topic/Aspects	Methods	Periodicity	Location
CHm01	Cultural heritage training	<ul style="list-style-type: none"> Number of Project personnel and contractor workers trained in Chance Finds Procedure 	Six-monthly during construction, annual thereafter	OMAS site
CHm02	Cultural heritage incidents	<ul style="list-style-type: none"> Number of incidents reported in each monitoring period. All incidents investigated and mitigation measures implemented where required, and signed off. Physical copy of incident reports maintained on file. 	Six-monthly during construction, annual thereafter	Across the Project Area

9 TRAINING

All employees of OMAS and Contractors will be trained on the implementation of the Cultural Heritage Management Procedure (OMAS-HSEC-PRC-007) and Chance Find Procedure as part of the general Induction Training. Training records will be kept by HR and the Environmental Department.

10 AUDIT AND REPORTING

10.1 Internal Auditing

Daily inspections will be carried out by operational area superintendents / supervisors covering a broad range of operational aspects, including cultural heritage (principally Chance Finds).

Any incidents identified during these inspections will be reported to the incident management system.

All incidents and non-conformances identified will be reported as per the requirements of the OMAS ESMS Framework.

10.2 External Auditing

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

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10.3 Record Keeping

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

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Annex 1: Chance Find Form

ÖKSÜT MINING PROJECT ARCHAEOLOGICAL CHANCE FIND FORM

Location Information

Coordinate :

Elevation :

Short Field Description :

Short Information About Findings

Architectural Pieces

Pottery Sherd

Sculpture etc.

Metal Find

Human/Animal Bone

Bone finds

Terracotta Find

Glass Finds

Undefined

Temporary Precautions

Photo