

**ENVIRONMENTAL AND SOCIAL ACTION PLAN
OKSUT GOLD MINE, TURKEY (THE 'PROJECT')**

FINAL (11 JULY 2016)

No.	Action	Environmental & Social Risks (Liability/ Benefits)	Requirements (Legislative, EBRD PR, IFC PS, Best Practice)	Resources	Timetable	Completion Indicator	Status
PR1	Assessment and Management of Environmental and Social Risks and Impacts						
1.1	<p>Submit an environmental and social¹ report to the Lenders² on the environmental and social performance of the Project and the status of the implementation of this ESAP.</p> <p>This report may be compiled by the Company or by an independent environmental and social consultant approved or appointed by the Lenders.</p>	Lender reporting requirement	EBRD PR 1 IFC PS1	Company ³ resources	<p>During construction: Environmental and social report and ESAP progress update to the Lenders every six months for the duration of construction phase.</p> <p>During operation: Annual environmental and social report and ESAP progress update to the Lenders within 60 days of Company year-end for the duration of Lenders financing of the Project.</p>	<p>Environmental and social reports (template to be provided by the EBRD) and ESAP progress updates received.</p> <p>Reports and progress against this ESAP satisfactory to the Lenders.</p>	

¹ 'Environmental and social' includes occupational and community health, safety, security, gender and human rights as well as human resources matters and working conditions.

² EBRD and UniCredit and other lenders as the case may be.

³ Öksüt Sanayi ve Ticaret Madencilik A.Ş. (OMAS)

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1.2	<p>Fully develop the environmental and social management system (ESMS) and associated procedures, provisions and resources to ensure appropriate mitigation, management, monitoring and reporting of environmental and social issues associated with the Project during the construction, operation and closure phases. The ESMS should be aligned with international best practice such as ISO 14001.</p> <p>Integrate the consideration of the occupational health and safety issues in the ESMS or create a separate occupational health and safety management system (HSMS) – see action 1.3. Ensure that environmental, social and health and safety issues are considered in an integrated manner</p>	Appropriate management of environmental and social issues through implementation of a formal management system	EBRD PR 1 IFC PS 1 Best practice	Company resources Assign responsibilities	In place prior to construction, operation and closure where relevant. Implementation as required.	EHS management system in place and implemented.	
1.3	Develop and implement an occupational health and safety management system (HSMS) and associated procedures, provisions and resources (or integrate the HSMS into the ESMS) to ensure appropriate mitigation, management, monitoring and reporting of occupational health and safety issues associated with the Project during the construction, operation and closure phases. The HSMS should be aligned with international best practice such as OHSAS 18001.	Appropriate management of health and safety issues through implementation of a formal management system	EBRD PR 1 and 4 IFC PS 1 and 4	Company resources Assign responsibilities	In place prior to construction, operation and closure where relevant. Implementation as required.	HSMS in place and implemented	
1.4	Appoint a dedicated environmental and health and safety manager for the Project.	Implementation of the environmental, social, health and safety management systems.	EBRD PR 1 IFC PS 1	Company resources	Prior to construction and then for the life of the Project.	EHS manager appointed to the Project.	

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1.5	<p>Develop the existing environmental and social management and monitoring plans already developed as part of the 2016 Project ESIA package into fully detailed plans, where relevant, and integrate them into the ES and HS management systems.</p> <p>Implement and maintain such plans for the life of the Project.</p> <p>These plans include:</p> <ul style="list-style-type: none"> • Air Emissions Management Plan • Biodiversity Management Plan • Community Health, Safety and Security Management Plan • Community Development Framework (see action 1.6) • Conceptual Mine Closure Framework (see action 3.4) • Contractor Management Framework • Cultural Heritage Management Plan • Cyanide Management Framework (see action 3.1) • Emergency Response Plan • Hazardous Materials Management Plan • Labour Management Plan • Livelihood Restoration Framework (see action 5.1) • Mineral Waste Management Plan • Noise and Vibration Management Plan • Non Mineral Waste Management Plan • Stakeholder Engagement Plan (see action 10.1) • Transport Management Plan • Water Resources Management Plan 	<p>Management and monitoring of environmental, social, health and safety issues through implementation of appropriate management and monitoring plans.</p>	<p>EBRD PR 1 IFC PS 1 Best practice</p>	<p>Company resources External consultants, if required Assign responsibilities</p>	<p>Prior to construction, operations and closure where relevant and as defined by each framework/plan</p>	<p>Fully developed environmental, social, health and safety management and monitoring plans in place and implemented.</p>	

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1.6	Prepare a detailed Community Development Plan based on Community Development Framework and community development needs assessment	Community development	EBRD PR 1 IFC PS 1	Company resources	By end Q3 2016	Community Development Plan completed	
1.7	Ensure that the necessary provisions are in place to manage environmental, social, health and safety and labour risks associated with contractors and suppliers including the inclusion of the necessary clauses in tenders and contracts and regular Company monitoring and audits of contractor and supplier performance.	Management and monitoring of potential contractor environmental, health and safety and labour risks.	EBRD PR 1, 2 and 4 IFC PS 1, 2 and 4 Best practice	Company resources Assign responsibilities	In place prior to appointment of contractors or suppliers. Management and monitoring during contracting periods.	Adequate provisions in place to manage contractor and supply chain environmental, social, health and safety and labour risks.	
PR2	Labour and Working Conditions						
2.1	Ensure that Human Resources (HR) provisions and working conditions for Company employees and contractors are in line with PR 2 and national labour requirements. See 1.4 with respect to contractors.	Appropriate management of Company and contractor labour risks	EBRD PR 2 IFC PS 2 Labour legislation	Company resources	Prior to construction and during the life of the Project	Company HR provisions and working conditions in line with PR 2 and national labour requirements. Company HR requirements applied to contractors.	
2.2	Provide to the Lenders a workers/contractor accommodation options review and plan.	Management of worker/contractor accommodation risks	EBRD PR 2 IFC PS 2	Company resources Contractors	At least one month prior construction works commencing.	Workers/contractor accommodation options review and plan received.	

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2.3	Ensure that the workers/contractors accommodation to be used for the Project meets the requirements defined in the "IFC/EBRD Workers' accommodation: processes and standards" guidance note.	Management of worker/contractor or accommodation risks	EBRD PR 2 IFC PS 2	Company resources Contractors	During accommodation development and use	Worker/contractor accommodation in line with the requirements prescribed in the "IFC/EBRD Workers' accommodation: processes and standards" guidance note.	
2.4	Undertake an Employee Standards Audit on a regular basis to ensure compliance with EBRD PR 2/ IFC PS 2 requirements, ILO and national labour requirements by the Company and by all contractors.	Appropriate management of Company and contractor labour risks	EBRD PR 2 IFC PS 2 ILO standards Turkish Labour law	Company resources Consultant inputs if required	During construction (quarterly) and operation (annually)	Provision of employee and contractor audit reports Company and contractor HR provisions and working conditions in line with PR 2/PS 2, ILO and national labour requirements.	
PR3 Resource Efficiency and Pollution Prevention							
3.1	Prepare and implement a cyanide management plan in conjunction with selected cyanide supplier to comply with the International Cyanide Management Code (ICMC) and management potential risks associated with the transport, storage, handling and use of cyanide.	Transport, storage, handling and use of cyanide	EBRD PR 3 IFC PS 3 International Cyanide Management Code	Company resources Cyanide supplier selected	Prior to start of first cyanide shipment.	Cyanide Management Plan in place and implemented.	

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3.2	Undertake cyanide risk modelling to further define the potential risks of cyanide on water resources in the event of an accident or unplanned event.	Cyanide risk management	EBRD PR 3 IFC PS 3	Company resources Consultant	By end 2016	Cyanide risk modelling undertaken	
3.3	Seek ICMC certification for the operation of the Project and the transport of cyanide.	Cyanide risk management	Best Practice	Company resources Consultant	Within 3 years of operations commencing	ICMC certification in place	
3.4	<p>Ensure that an appropriate mine closure plan is in place for the Project as follows:</p> <ul style="list-style-type: none"> • Conceptual closure and plan – 1 year after commencement of mining operations; • Closure plan – within 3 years of commencement of mining operations; • Final closure plan – 2 years prior to planned completion of mining operations. <p>The closure plan will be in line with international good practice for mine closure and the development and implementation thereof duly financed as required by the Company.</p>	Closure and post-closure impact management	EBRD PR 1, 3, 4 and 6 IFC PS 1, 3, 4 and 6 EU Mine Waste Directive International good practice	Company resources	Conceptual plan within one year of the start of mining operations	<p>Conceptual Closure Plan in place and developed into a full plan as per timetable.</p> <p>Closure plan satisfactory to the Lenders</p>	
PR4	Community Health, Safety, and Security						
4.1	Develop and implement a security plan in line with the Voluntary Principles on Security and Human Rights.	Security risk management	EBRD PR 4 IFC PS 4	Company resources	<p>Prior to construction commencing</p> <p>Revised and updated prior to operations commencing</p>	Security plan in place and implemented	

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PR5	Land Acquisition and Involuntary Resettlement						
5.1	Develop and implement a detailed Livelihoods Restoration Plan based on the Livelihoods Restoration Framework.	Livelihood risks of physically and economically displaced land owners and land users appropriate mitigated	EBRD PR 5 IFC PS 5	Company resources	Prior to commencement of mining operations	Completed and implemented Livelihoods Restoration Plan	
PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	Implement the Biodiversity Action Plan (BAP) in accordance with the BAP schedule.	Impacts to Priority Biodiversity Features and Critical Habitat	EBRD PR 6 IFC PS 6	Internal OMAS resources External biodiversity specialists	As outlined in the BAP	As outlined in the BAP	
PR8	Cultural Heritage						
8.1	Implement the chance finds procedure during construction works and operations	Management of potential chance finds	EBRD PR 8 IFC PS 8	Company resources and contractors	During construction works and operations	Chance finds (if any) appropriately managed in line with the chance finds procedure and national legislation.	

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PR1 0	Information Disclosure and Stakeholder Engagement						
10.1	Implement and maintain the stakeholder engagement plan (SEP) for the life of Project. The SEP should be revised and updated on a regular basis. The SEP may be integrated into existing company procedures.	Appropriate stakeholder engagement and information disclosure	EBRD PR 10 IFC PS 1	Company resources	During ESIA disclosure and for the life of the Project	SEP implemented and maintained	
10.2	Maintain a functional external grievance mechanism for the life of the Project.	Stakeholder grievance management	EBRD PR 10 IFC PS 1	Company resources	During ESIA disclosure and for the life of the Project	Grievance mechanism implemented and maintained.	
10.3	Disclose the final mine closure plan when available in accordance with the SEP.	Information disclosure	EBRD PR 10 IFC PS 1	Company resources	When final closure plan is available	Final mine closure plan disclosed.	