

## TABLE OF CONTENTS

<b>2. LEGAL AND PLANNING POLICY FRAMEWORK .....</b>	<b>2</b>
2.1 INTRODUCTION .....	2
2.2 NATIONAL LAWS AND PLANNING GUIDANCE.....	2
2.2.1 <i>Constitution and Governance</i> .....	2
2.2.2 <i>Mining Legislation</i> .....	2
2.2.3 <i>Environmental Legislation</i> .....	4
2.2.4 <i>Land</i> .....	5
2.2.5 <i>Explosives and Blasting</i> .....	5
2.2.6 <i>Cultural Heritage</i> .....	6
2.2.7 <i>Occupational Health and Safety</i> .....	6
2.2.8 <i>Emergency Response</i> .....	8
2.3 INTERNATIONAL TREATIES AND AGREEMENTS .....	8
2.3.1 <i>Agreements on the Protection of Environmental &amp; Natural Resources</i> .....	8
2.3.2 <i>Agreements Relating to Protection of Social and Cultural Resources</i> .....	8
2.3.3 <i>Labour Relations and Workers' Rights</i> .....	9
2.3.4 <i>Hazardous Substances</i> .....	10
2.4 REQUIREMENT FOR PROJECT FINANCING .....	10
2.4.1 <i>EBRD Environmental and Social Policy</i> .....	10
2.4.2 <i>European Union Directives</i> .....	11
2.5 OMAS PROJECT STANDARDS .....	12
2.6 OMAS POLICIES .....	18
2.6.1 <i>OMAS Health, Safety and Environment Policy</i> .....	19
2.6.2 <i>OMAS Sustainability Policy</i> .....	20

### Tables

Table 2-1: State Right Royalty Price .....	3
Table 2-2: Project Ambient Air Quality Standards.....	13
Table 2-3: Ambient Air Metal Pollutant Concentration Limits.....	13
Table 2-4: Limits for Atmospheric Emissions from Stationary Sources .....	14
Table 2-5: Noise Standards.....	14
Table 2-6: Vibration Standards.....	15
Table 2-7: Soil Standards.....	15
Table 2-8: Drinking Water Standards .....	16
Table 2-9: Effluent Wastewater Standard .....	18

---

## 2. Legal and Planning Policy Framework

---

### 2.1 Introduction

This Chapter of the ESIA describes the policy and legal framework relating to the management of environmental and social risks for the OMAS Gold Project. The Chapter also describes the environmental and social policies of OMAS, as these also frame the application of environmental and social management controls.

Turkey is on the accession path to EU membership and is in the process of aligning its national environmental legislation and standards to meet EU requirements. Hence, the EU framework for environmental and social protection is particularly relevant to this ESIA. For certain environmental media, such as air quality, Turkish standards are already converging with those of the EU.

In addition, this ESIA has been prepared to meet the environmental and social requirements of EBRD, which requires its clients to adopt EU standards for the construction and operation of new projects, where these standards are more stringent than national requirements.

Specific environmental quality standards are discussed within the relevant baseline and impact assessment chapters of the ESIA.

### 2.2 National Laws and Planning Guidance

#### 2.2.1 Constitution and Governance

Turkey is a republican parliamentary democracy, with an elected President as Head of State, and a Prime Minister as Head of Government. A Council of Ministers is appointed on the advice of the Prime Minister. The legislative authority is the National Assembly, which is elected every 4 years, and there is a separate judiciary.

The territory of Turkey is subdivided into 81 provinces, which are grouped into 7 regions; however, these do not represent administrative structures. Each province is divided into districts, with a total of 919 districts. Provinces with the largest populations are Istanbul, Ankara, İzmir, Bursa and Adana.

Each province is administered by a Governor appointed by a Council of Ministers with the approval of the President. The Governors are the principal agents of the central government and report to the Ministry of Interior. The constitution grants governors extraordinary powers during a state of emergency.

A district may cover both rural and urban areas. One of the districts of a province is the central district; administered by an appointed Vice-Governor, while a District Governor governs the other districts. Each district (including the central district) is administered from the "district centre", where the appointed District Governor resides, who reports to the Province Governor.

All district centres have municipalities, headed by an elected Mayor, who administers a defined municipal area (usually matching the urban zone) and manage public services.

The lowest administrative level is the neighbourhood (or quarter), which has an elected *muhtar*, who handles neighbourhood administrative matters.

#### 2.2.2 Mining Legislation

Mining activities in Turkey are regulated by the *Mining Law* No 3213 dated 15 June 1985 (amended most recently on 24 June 2010 by law 5995 and New Law issued on 4 February 2015 by Law 6592) <sup>1</sup>. Secondary legislation relating the Mining Law includes:

---

<sup>1</sup> Some articles of Mining Law No. 5995 which were kept from Mining Law 3213 are still in operation but most of the articles were changed via new Mining Law No. 6592 dated 4th February, 2015.

- *Implementation Regulation on Mining Activities* dated 6 November 2010 (the Mining Regulation), which is in operation until new regulation will be released according to new Mining Law No. 6592 dated 4<sup>th</sup> February, 2015.

Article 4 of the *Mining Law* outlines that mining rights and minerals are exclusively owned by the state. The ownership of the minerals in Turkey is not subject to the ownership of the relevant land. The State, under the mining legislation, delegates its rights to explore and operate to individuals or legal entities by issuing licences for a determined period of time in return for a state right royalty payment (Article 14). For gold, the Mining Law dictates state right royalties, based on the gold price, as outlined in Table 2-1.

**Table 2-1: State Right Royalty Price**

State Right Royalty	Gold Price (\$/oz)
2%	<800
4%	801-1250
6%	1251-1500
8%	1501-1750
10%	1751-2000
14%	2001-2250
18%	>2251

If gold mining activity occurs on state owned land the licence holder is required to pay an additional 30% royalty<sup>2</sup>. If extracted ores are processed in Turkey (thus providing additional value to the Turkish economy), only 50% of the royalty is to be paid.

State owned forestry land requires a royalty payment direct to the Forestry General Directorate.

The *Mining Law* requires mining licences to be given according to certain mineral groups, and the licensing procedure for each class is slightly different. There are two types of licence granted for prospecting and operating mines under Turkish law:

- An exploration licence (enables holder to carry out exploration activities in a specific area). Exploration licences are valid for 7 years. Exploration licences may be extended additional 2 years for gold, silver, copper (which are under group 4 minerals according to the *Mining Law*), to develop detailed exploration works.
- An operating licence (enables holder to carry out operational activities. After obtaining an operation licence permit, if the company cannot start production within 3 years, it must pay 50,000 TRY per year for the next 2 years. If production does not commence within 5 years, the company must pay 10% of yearly production if delays are reasonable.

In order to obtain an operating permit, authorisations listed under Article 7 of the *Mining Law* must be obtained from various administrative institutions within three years of the grant of the operation licence:

- Environmental impact assessment (EIA) decision, where operations above the thresholds listed in Annex I and Annex II of the *EIA Regulation* must obtain an “EIA positive” or “EIA not required” decision.
- Workplace opening and operation licence.
- Authorisations required for mining on certain types of land, including forestry and pastureland areas.

<sup>2</sup> when new implementation regulation will be issued according to new Law no. 6592, existing application for state land payments (includes only treasury lands and pasturelands) which are related to additional 30% royalty payment of determined royalty ranges may be changed.

If the company does not obtain operational permits and start to construction within 3 years according to *Mining Law* article 7 the Company should be fined 50,000 TRY per delayed year.

## **Institutional Framework**

The Ministry of Energy and Natural Resources (MENR) is the ministry responsible for overseeing the mining industry. The General Directorate of Mining Affairs (the Mining Directorate), a department of MENR, grants licences and regulates mining activity.

### **2.2.3 Environmental Legislation**

The *Environmental Impact Assessment (EIA) Regulation*, which dates originally from 1998, has had several revisions and was most recently amended in November 2014. Although the *EIA Regulation* has been derived from the European Union EIA Directive, the integration of various Turkish conventions, sub-laws and governmental decrees makes the *EIA Regulation* distinctive in certain respects.

Mining licence holders that are above the thresholds listed in Annex I or II to the *EIA Regulation* must obtain an affirmative EIA report, or a decision that an affirmative EIA report is not required in the circumstances. The *EIA Regulation* includes the requirement for social baseline studies; however it does not however require social impact assessment studies.

The *Regulation on Regenerating the Lands Destroyed by Mining Activities Back to Nature*, issued in 2010 and updated in 2012, covers reclamation responsibilities of mining companies during closure in terms of their EIA commitments, and how these are monitored by the Ministry of Environment and Urban Planning. The Regulation requires a timetable for regeneration activities. There are no specific budget requirements<sup>3</sup> and no specific bond terms, however the regulation dictates legal fines and reactions if the mining companies do not comply with their EIA commitments. Monitoring is carried out by the Ministry of Environment and Urban Planning yearly, and the company has to submit yearly monitoring reports.

Other legalisation relating to mining activities includes:

- *Environmental Law;*
- *Control of Air Pollution from Industry Regulation;*
- *Control of Soil Pollution Regulation;*
- *Control of Hazardous Waste Regulation;*
- *Control of Water Pollution Regulation;*
- *Wildlife Protection Regulation.*

This ESIA references specific environmental legislation in relevant specialist chapters.

## **Institutional Framework**

The lead government agency with responsibility for environmental protection in Turkey is the Ministry of Environment and Urban Planning (MoEUP)<sup>4</sup>. MoEUP has a coordinating role in the development and enforcement of environmental policies in Turkey, including the EU regulatory approximation process. MoEUP is also responsible for EIA approvals for projects.

The main responsibilities of MoEUP of relevance to the OMAS Project are:

- implementation of EIA regulations and decision-making in the EIA approvals process including disclosure of the EIA to the public;

---

<sup>3</sup> Ministry of Forestry and Agriculture have different rates per hectare as part of reclamation deposit.

<sup>4</sup> Previously, the Ministry of Environment and Forestry was responsible for the EIA process in Turkey. During the last few years the Ministries' functions were revised and EIA now sits under the Ministry of Environment and Urban Planning (MoEUP) while forestry falls under the Ministry of Forestry and Water Works.

- setting policies and principles for environmental management in Turkey, including the administrative framework for environmental enforcement;
- defining and applying environmental quality standards (in conjunction with the Institute of Turkish Standards);
- supervision of the network of environmental laboratories in Turkey;
- pollution control and inspection activities;
- management of the forestry heritage and forest harvesting activities;
- agroforestry support, soil management and erosion control;
- protection of Turkey's natural heritage including national parks, areas of conservation interest, biodiversity and wildlife.

## 2.2.4 Land

The main land tenure regulation in Turkey is set by the *Land Registry Law No. 2644*, amended by Law No. 6302, which entered into force on 18 May 2012. Land registration in Turkey is based on Cadastral laws. In addition to these, there are more than 30 laws and regulations, including some decrees, relating to land tenure. The responsible organisation for both land registration and the cadastre is the General Directorate of Land Registry and Cadastre (GDLRC).

The GDLRC carries out its work via the District and Local Directorates of Land Registry and Cadastre. The technical aspects of the cadastral work can be contracted to private surveyors.

The cadastral registration covers all land within municipal boundaries including:

- Privately owned land (registered in the land registry), according to Civil Law, the title deed represents an ownership of the parcel, which is secured with the state authority;
- State-owned land (registered in the land registry);
- Land that is not subject to registration, known as unregistered state-owned land. There have been some incorrect cadastral registrations and as a result some land of this kind has been registered under private names.

According to the Turkish laws and regulations in force, transfer of ownership of a property is only possible with an official deed and registry which is signed at the Land Registry Directorate.

The use of state-owned land (pastureland, forestry land, treasury land) by citizens is rule-bound. Citizens can rent pastureland after receiving the required permissions from the relevant Pastureland Commission which is a sub-unit of the Ministry of Food, Agriculture and Livestock. Citizens can also rent treasury lands for agricultural, commercial, sports and social activities, fishing or other reasons.

Forestry land cannot be used for private purposes, be it agriculture, grazing or other purposes. The use of forestry land is allowed only for mining projects, projects for the public welfare (dams, highways, etc.) and for tourism-related projects only if approved by the relevant governmental authorities.

In line with a bill approved on April 18, 2013 land classified as "2B land", which was formerly classified as forest land but which has been occupied and used by individuals without payment and without title deeds, may now be bought by its users. It also appears that some 2B land, which has not been occupied yet, will now also be open for sale.

## 2.2.5 Explosives and Blasting

The principles will be followed as set out in the *Bylaw on the Principles and Procedures Applicable to Manufacturing, Importation, Transportation, Storage, Warehousing, Sales, Use, Destruction and Scrutiny of Explosives, Hunting Supplies and Similar Items which are excluded from the State Monopoly (TDBPM)*, Official Gazette no. 19589 of 29/09/1987.

Moreover, all the measures specified in the following regulations will be taken:

- *Regulation on Occupational Health and Safety in Mines* (Official Gazette of 19.09.2013; No: 28770);
- *Regulation on Fight against Dust* (Official Gazette of 05.11.2013; No: 28812);
- *Regulation on the Transportation of Dangerous Materials by Road* (Official Gazette of 24.10.2013; No: 28801).

## 2.2.6 Cultural Heritage

Cultural Heritage is governed by the *Law on the Conservation of Cultural and Natural Property* (Number 2863) and requires that any artefact discovered during the construction works or operations of a project will lead to activities being stopped and notification given to the nearest museum, *muhtar* of the nearest neighbourhood, or to the highest local administrator.

## 2.2.7 Occupational Health and Safety

Occupational health and safety (OHS) is the responsibility of the Ministry of Labour and Social Security. There are four main departments involved in the OHS System in Turkey and working on issues related with OHS within the Ministry.

1. **Directorate General of OHS**, the Focal Point of Agency Network, works on legislation, policy making, authorisation of individuals, institutions and organizations serving the OHS field, raising awareness and information activities, national and international cooperation and coordination of National OHS network in Turkey. The Occupational Health and Safety Centre (ISGUM), an affiliated body of the Directorate General of OHS, works on measurements at workplaces and setting measurement standards.
2. **Labour Inspectorate Board** inspects the compliance with OHS regulations at workplaces.
3. **Training and Research Centre for Labour and Social Security (ÇASGEM)** organise the training for professionals and other related target groups for OHS besides the other training related to labour life.
4. **Social Security Institution (SGK)** collects and analyses data about labour and provides occupational statistics and compensation in cases of occupational diseases and accidents.

As an employer, mining operators must comply with:

- *The Labour Law* (Number 4857) which sets out minimum requirements for employee working conditions. This law also regulates the individual employment relations between an employer and an employee. The law covers both the employment contract of manual workers and office workers, but excludes public service employees.
- *The Occupational Health and Safety Law* (Number 6331) which stipulates employer obligations for providing a healthy and safe working environment for its employees. Workplaces are classified according to their hazard levels. All mining activities are classified as very hazardous or hazardous (*Workplace Hazard Classification List*, published in the Official Gazette on 29 March 2013). The *Law on Occupational Health and Safety* envisages additional obligations for workplaces with these levels of hazard classification. For example, employers must employ occupational safety specialists, workplace doctors and for very hazardous workplaces with more than ten employees, other healthcare personnel (Article 6, *Law on Occupational Health and Safety*).
- *Mining Safety Regulation* (published in the Official Gazette No. 28770, dated 19 September 2013) for the protection of employee health and safety for mineworkers. The conditions of mining sites and employer responsibilities are regulated in detail. Some mining-specific health and safety requirements are that:
  - mining sites should be designed, operated, and maintained properly to protect workers' safety;



- employers must compose safety instructions in a comprehensible manner;
- employers must compose a health and safety report, and update it as necessary. The report should determine the risks of the workplace (including psycho-social risks) and develop a plan for applying legal requirements and safety measures;
- employers must take necessary measures for explosions, form an emergency plan and ready escape vehicles, as well as maintain a proper communication and signal system within the mining site. These measures include establishment of a “life line” in underground mining facilities, specifications of which is listed in a detailed manner under *the Mining Safety Regulation Annex 3*.

A number of additional health and safety regulations are in place in Turkey including:

- *Regulation on Working Conditions of Woman Workers at Night-Time Shifts*
- *Regulation on Prevention of Exposure Risks to Biological Agents*
- *Regulation on Prevention of Large Industrial Facility Related Accidents and Mitigation of Relevant Effects*
- *Regulation for Manual Handling Operations in Workplaces*
- *Regulation on Occupational Health and Safety at Temporary or Fixed-Time Employment*
- *Regulation on Health and Safety Measures in Working with Chemicals*
- *Regulation on Personal Protective Equipment*
- *Regulation on Works Requiring At Most Seven and Half Hour or Less Work-Time According to Health Related Considerations*
- *Regulation on Health and Safety Signs*
- *Regulation on Occupational Training of Workers to be Employed in Dangerous Workplaces*
- *Regulation on Dust Control*
- *Regulation on National Occupational Health and Safety Council*
- *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 Procedures and Principles of Young and Child Worker Employment*
- *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 Laboratories Measuring, Testing and Analysing Occupational Hygiene*
- *Regulation on Occupational Health and Safety Services*
- *Regulation on the Support of Occupational Health and Safety Services*
- *Regulation on Occupational Health and Safety Organizations*
- *Regulation on Risk Assessment Regarding Occupational Health and Safety*
- *Regulation on Health and Safety Related Measures to be taken at Buildings and Auxiliaries in Workplaces*
- *Regulation on Emergency Situations in Workplaces*

- *Regulation on Work Stoppage in Workplaces*

## 2.2.8 Emergency Response

Following accidents at Ovacikin 2014, mine safety and emergency response policy and legislation is under ongoing review and revision by the Ministry of Labour and Social Security and the Ministry of Environment and Urban Planning. The following regulation and policy is relevant to the Project:

- *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).

## 2.3 International Treaties and Agreements

Turkey is signatory to a number of key international environmental agreements and has incorporated the provisions into national legislation. The key international agreements are summarised below.

### 2.3.1 Agreements on the Protection of Environmental & Natural Resources

Turkey is signatory to the following international agreements relating to environmental management:

- *Convention on Biological Diversity*, 1992 (ratified by Turkey in 1997);
- *Convention on Conservation of European Wildlife and Natural Habitats*, Bern, 1979 (ratified by Turkey in 1984);
- *Montreal Protocol on Substances that Deplete the Ozone Layer*, 1987 (Turkey acceded in 1991);
- *Convention on Long-Range Transboundary Air Pollution Geneva*, 1979 (ratified by Turkey in 1983);
- *Control of Transboundary Movements of Hazardous Wastes and Their Disposal*, (Basel Convention), 1989 (ratified by Turkey in 1994);
- *Convention on International Trade in Endangered Species*, 1973, (acceded to by Turkey in 1996);
- *Convention on Wetlands of International Importance*, Ramsar, (ratified by Turkey in 1994);
- *UN Framework Convention on Climate Change*, 1992, (Turkey is an Annex I party and ratified the Convention in 2004. Turkey ratified the Convention's Kyoto Protocol in 2009).

Turkey has not signed the *Convention on Migratory Species* (Bonn Convention), 1979.

### 2.3.2 Agreements Relating to Protection of Social and Cultural Resources

Turkey is signatory to the following international agreements relating to social management:

- *Convention for the Protection of Cultural Property in the Event of Armed Conflict*, The Hague, 1954 (acceded to by Turkey in 1965);
- *Convention on Protection of World Cultural and Natural Heritage*, Paris, 1972 (ratified by Turkey in 1983);
- *Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property*, Paris, 1970 (ratified by Turkey in 1981);
- *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage*, 2003, (ratified by Turkey in 2006).

Turkey has not signed the *Convention on the Protection and Promotion of the Diversity of Cultural Expressions*, Paris, 2005.



Turkey's participation in these international treaties has been taken into account in the development of appropriate management plans for protection of the environment.

### **2.3.3 Labour Relations and Workers' Rights**

There are total of 59 conventions ratified by Turkey, of which 53 are in force, 4 have been denounced and 2 have been ratified in the past 12 months.

The list of all relevant conventions ratified by Turkey is as follows;

- *Unemployment Convention, 1919*
- *Minimum Wage-Fixing Machinery Convention, 1928*
- *Forced Labour Convention, 1930*
- *Fee-Charging Employment Agencies Convention, 1933*
- *Workmen's Compensation (Occupational Diseases) Convention (Revised), 1934*
- *Underground Work (Women) Convention, 1935*
- *Officers' Competency Certificates Convention, 1936*
- *Minimum Age (Industry) Convention (Revised), 1937*
- *Medical Examination of Young Persons (Industry) Convention, 1946*
- *Final Articles Revision Convention, 1946*
- *Labour Inspection Convention, 1947*
- *Freedom of Association and Protection of the Right to Organise Convention, 1948*
- *Employment Service Convention, 1948*
- *Labour Clauses (Public Contracts) Convention, 1949*
- *Protection of Wages Convention, 1949*
- *Fee-Charging Employment Agencies Convention (Revised), 1949*
- *Right to Organise and Collective Bargaining Convention, 1949*
- *Equal Remuneration Convention, 1951*
- *Social Security (Minimum Standards) Convention, 1952*
- *Abolition of Forced Labour Convention, 1957*
- *Discrimination (Employment and Occupation) Convention, 1958*
- *Radiation Protection Convention, 1960*
- *Equality of Treatment (Social Security Convention), 1962*
- *Guarding of Machinery Convention, 1963*
- *Employment Policy Convention, 1964*
- *Minimum Age (Underground Work) Convention, 1965*
- *Maximum Weight Convention, 1967*
- *Accommodation of Crews (Supplementary Provisions) Convention, 1970*
- *Workers' Representatives Convention, 1971*
- *Minimum Age Convention, 1973*
- *Human Resources Development Convention, 1975*

- *Tripartite Consultation (International Labour Standards) Convention, 1976*
- *Occupational Safety and Health Convention, 1981*
- *Termination of Employment Convention, 1982*
- *Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983*
- *Occupational Health Services Convention, 1985*
- *Safety and Health in Construction Convention, 1988*
- *Safety and Health in Mines Convention, 1995*
- *Worst Forms of Child Labour Convention, 1999*
- *Promotional Framework for Occupational Safety and Health Convention, 2006*

### **2.3.4 Hazardous Substances**

Turkey is a signatory of a number of conventions and protocols on hazardous substances, those relevant to the Project are listed below:

- *Basel Convention on the Control of Trans-boundary Movements of Hazardous Wastes and Their Disposal*
- *Stockholm Convention on Persistent Organic Pollutants*
- *United Nations Framework Convention on Climate Change*
- *The Vienna Convention for the Protection of the Ozone Layer*
- *Convention on Long-Range Trans-boundary Air Pollution*
- *International Convention on the Establishment of an International Fund for Compensation for Oil Pollution Damage,*
- *International Convention on Civil Liability for Oil Pollution Damage*
- *Montreal Protocol on Substances that Deplete the Ozone Layer*
- *Kyoto Protocol*
- *Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade*
- *United Nations Economic Commission for Europe Convention on the Trans-boundary Effects of Industrial Accidents*

## **2.4 Requirement for Project Financing**

### **2.4.1 EBRD Environmental and Social Policy**

This ESIA has been prepared to meet the requirements of the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2014), including the EBRD Performance Requirements (PRs).

The Policy specifies a set of 10 PRs that projects are expected to meet in order to obtain financial support from the EBRD, as follows:

- PR 1: Assessment and Management of Environmental and Social Impacts and Issues;
- PR 2: Labour and Working Conditions;
- PR 3: Resource Efficiency and Pollution Prevention and Control;

- PR 4: Health and Safety;
- PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement;
- PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- PR 7: Indigenous Peoples (not applicable to this Project);
- PR 8: Cultural Heritage;
- PR 9: Financial Intermediaries (not applicable to this Project);
- PR 10: Information Disclosure and Stakeholder Engagement.

## 2.4.2 European Union Directives

The EBRD is committed to promoting the European Union's (EU) environmental requirements and is a signatory of the European Principles for the Environment. EU Directives relevant to this Project are outlined below.

### Environmental Assessment & Public Participation

- Directive 85/337/EEC '*EIA Directive*', On the Assessment of the Effects of Certain Public and Private Projects on the Environment, amended with Directive 97/11/EC, Directive 2003/35/EC, Directive 2009/31/EC, Directive 2011/92/EU; Directive 2014/52/EU;
- Directive on *Public Access to Environmental Information* (2003/4/EC);
- Directive 2003/35/EC *Providing for Public Participation in Respect of the Drawing up of Certain Plans and Programs Relating to the Environment and Amending with Regard to Public Participation and Access to Justice* Council Directives 85/337/EEC and 96/61/EC (2003/35/EC);
- *Convention on Environmental Impact Assessment in a Transboundary Context* (Espoo Convention, February 1991);
- *Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters* (Aarhus Convention, June 1998);
- Directive 2001/42/EC '*Strategic Environmental Assessment Directive*', On the Assessment of the Effects of Certain Plans and Programmes on the Environment;
- Directive 90/313/EEC on *Freedom of Access to Information on the Environment*.

### Water

- Directive 200/60/EC *Water Framework Directive*;
- Decision No 2455/2001/EC *Establishing the List of Priority Substances in the Field of Water Policy*;
- Directive 2008/105/EC on *Environmental Quality Standards in the Field of Water Policy*.

### Waste Management

- Directive 2006/12/EC amended by Directive 2008/98/EC on *Waste Management*;
- Commission Decision 2000/532/EC, replacing Decision 94/3/EC Establishing a List of Wastes Pursuant to Article 1(a) of Council Directive 75/442/EEC on Waste and Council Decision 94/904/EC Establishing a List of Hazardous Waste Pursuant to Article 1(4) of Council Directive 91/689/EEC on Hazardous Waste;
- *List of Waste* as amended by Commission Decisions 2001/118/EU, 2001/119/EU and 2001/573/EU;
- Directive 75/439/EEC on *Disposal of Waste Oils* as amended by Directives 87/101/EEC, 91/692/EEC and Partially Repealed by Directive 2000/76/EC;
- Directive 91/689/EEC on *Hazardous Waste*, as amended by Directive 94/31/EC EU;

- Directive 94/62/EC on *Packaging and Packaging Waste*.

## Protected Natural Areas and Biodiversity

- Directive 92/43/EEC on the *Conservation of Natural Habitats and of Wild Fauna and Flora* Directive as amended by Directives 97/62/EC and Regulation EC 1882/2003;
- Directive 79/409/EEC on the *Conservation of Wild Birds*, as amended by Directives 81/854/EEC, 85/411/EEC, 91/244/EC, 94/24/EC and 97/49/EC, and Regulation (EC) 807/2003;
- Regulation EC 338/97 on *Endangered Species*, as amended by Regulations (EC) 938/97, 2307/97, 2214/98, 1476/99, 2724/2000, 1579/2001, 2476/2001, 1497/2003, 1882/2003, 834/2004, 252/2005 and 1332/2005.

## Noise and Vibration

- Directive 2002/49/EC on *Assessment and Management of Environmental Noise Directive*;
- Directive 2000/14/EC on *Outdoor Equipment*.

## Air Quality

- Directive 2008/50/EC on *Ambient Air Quality and Cleaner Air for Europe*;
- EU Directive 2010/75/EU On *Industrial Emissions (Integrated Pollution Prevention and Control)*;
- Directive 2000/69/EC relating to *Limit Values for Benzene and Carbon Monoxide in Ambient Air*;
- Directive 98/69/EC on *Measures to be taken against Air Pollution by Emissions form Motor Vehicles*.

## Cultural Heritage and Archaeology

- *European Landscape Convention* (Florence, 2000).

## Occupational Health and Safety

- Directive 89/654/EEC on *Workplace Requirements, Concerning the Minimum Safety and Health Requirements for the Workplace* (first individual directive within the meaning of Article 16 (1) of Directive 89/391/EEC);
- Directive 2003/10/EC on the *Minimum Health and Safety Requirements Regarding the Exposure of Workers to the Risks Arising from Physical Agents (Noise)*;
- Directive 1989/391/EEC on the *Introduction of Measures to Encourage Improvements in the Safety and Health of Workers at Work*;
- Directive 92/104/EEC – *OHS in mineral-extracting industries*;
- Directive 92/91/EEC – *OHS in drilling in mineral-extracting industries*;
- Directive 3002/105/EC and 96/61/EC on *Control of Major Accident Hazards Involving Dangerous Substances* (Seveso II Directive);
- Directive 2002/15/EC, *European Road Transport Working Time Directive*.

## Pollution Prevention

- Directive 2010/75/EU *concerning industrial emissions (integrated pollution prevention and control)*.

## 2.5 OMAS Project Standards

OMAS Project Standards have been developed based on the more stringent standard of national Turkish Legislation or EBRD requirements (including EU regulatory requirements where applicable). These are summarised in Table 2-2 to Table 2-9 below and are reproduced in the relevant technical chapter of this ESIA.

**Table 2-2: Project Ambient Air Quality Standards**

Pollutant	Time/Averaging Period	Maximum Allowable Limit		
		EU	Turkish	Project Standard
SO <sub>2</sub> (µg/m <sup>3</sup> )	Hourly	350	470 (for 2015) 440 (for 2016) 410 (for 2017) 380 (for 2018) 350 (for 2019-2023)	<b>350</b>
	24 hour	125	225 (for 2015) 200 (for 2016) 175 (for 2017) 150 (for 2018) 125 (for 2019-2023)	<b>125</b>
	Yearly and winter season (Oct 1st – March 31st) (for wildlife and ecosystem)	-	20	<b>20</b>
NO <sub>2</sub> (µg/m <sup>3</sup> )	Hourly	200	290 (for 2015) 280 (for 2016) 270 (for 2017) 260 (for 2018) 250 (for 2019-2023)	<b>200</b>
	Yearly	40	56 (for 2015) 52 (for 2016) 48 (for 2017) 44 (for 2018) 40 (for 2019-2023)	<b>40</b>
PM <sub>10</sub> (µg/m <sup>3</sup> )	24 hour	50	90 (for 2015) 80 (for 2016) 70 (for 2017) 60 (for 2018) 50 (for 2019-2023)	<b>50</b>
	Yearly	40	56 (for 2015) 52 (for 2016) 48 (for 2017) 44 (for 2018) 40 (for 2019-2023)	<b>40</b>
Fine particles (PM <sub>2.5</sub> , µg/m <sup>3</sup> )	Yearly	25	-	<b>25</b>
Settled Dust (mg/m <sup>2</sup> /day)	24 hour	-	390	<b>200</b> <sup>1</sup>
Ozone µg/m <sup>3</sup>	Maximum daily 8-hour average in calendar year	120		<b>120</b>

<sup>1</sup> Best practice limit for dust deposition, as suggested by Vallack, H. W. & Shillito, D. E. (1998), "Suggested guidelines for deposited ambient dust", Atmospheric Environment, Vol.32, pp.2737-274

**Table 2-3: Ambient Air Metal Pollutant Concentration Limits**

Parameter	Average Period	Maximum Allowable Limit <sup>1</sup>
Lead (Pb) (µg/m <sup>3</sup> )	1 year	0.5

Arsenic (As) (ng/m <sup>3</sup> )	1 year	6
Cadmium (Cd) (ng/m <sup>3</sup> )	1 year	5
Nickel (Ni) (ng/m <sup>3</sup> )	1 year	20

<sup>1</sup> Heavy metals are maximum allowable limits from the total content of the PM10 fraction averaged over one year. Limits are from Directive 2004/107/EC

**Table 2-4: Limits for Atmospheric Emissions from Stationary Sources**

Source	Pollutant	Standard (mg/Nm <sup>3</sup> ) unless stated otherwise		
		Turkish	EU	Project Standard
Diesel generators <sup>1</sup>	NO <sub>x</sub> <sup>2</sup>	-	N/A	<b>1,460<sup>3</sup></b> <b>1,850<sup>4</sup></b>
	SO <sub>2</sub>	1700		<b>1700</b>
	PM	200		<b>200</b>
	CO	150		<b>150</b>

<sup>1</sup> Typically rated <2MW and below 50MW threshold in EU Directive 2001/80/EC

<sup>2</sup> In the absence of applicable Turkish and EU standards for small-scale generators, the applicable IFC emissions guidelines have been used.

<sup>3</sup> IFC Standard: exhaust bore size diameter [mm] < 400

<sup>4</sup> IFC Standard: exhaust bore size diameter [mm] > or = 400

**Table 2-5: Noise Standards**

Pollutant / Source	Receptor	Standard (dB(A)Leq 1 h) unless stated otherwise				
		EU	Day	Evening	Night	Project Standard
Noise	Boundary fence	NA	NA			<b>75 (boundary)<sup>1</sup></b>
Noise (off site receptors)	Sensitive areas with Schools, libraries and conference rooms, Hospitals and health centres	-	60	55	45	<b>60 (Day)</b> <b>55 (Evening)</b> <b>45 (Night)</b>
	Locations with commercial areas and sensitive areas (dominated by residential areas)	-	65	55	45	<b>65 (Day)</b> <b>55 (Evening)</b> <b>45 (Night)</b>
	Locations with commercial areas and sensitive areas (dominated by commercial areas)	-	68	63	58	<b>68 (Day)</b> <b>63 (Evening)</b> <b>58 (Night)</b>
	Industrial areas	-	70	65	60	<b>70 (Day)</b> <b>65 (Evening)</b> <b>60 (Night)</b>
Activities (Construction, demolition and renovation)	Building <sup>2</sup>	-	70	-	-	<b>70</b>
	Road <sup>2</sup>	-	75	-	-	<b>75</b>
	Other Source <sup>2</sup>	-	70	-	-	<b>70</b>



Pollutant / Source	Receptor	Standard (dB(A)Leq 1 h) unless stated otherwise				
		EU	Day	Evening	Night	Project Standard
Air Vibration	Residential properties		120 dB L <sub>linear</sub>	120 dB L <sub>linear</sub>	120 dB L <sub>linear</sub>	<b>120 dB L<sub>linear</sub></b>

<sup>1</sup> OMAS has adopted a guideline noise limit of 75 dB(A) at boundary fence during normal operations.

<sup>2</sup> Turkish National Noise Limits for Construction Sites are based on the type of construction activity rather than receptor.

**Note:**

EU Noise Directive does not specify equivalent numeric threshold limits and a combination of German and Turkish standards are adopted as the Project Standard.

**Table 2-6: Vibration Standards**

Ground Vibration <sup>1</sup>	Sensitive Receptors	Vibration Frequency (Hz)	Peak Vibration Level (mm/s)	Vibration Frequency (Hz)	Peak Vibration Level (mm/s)
		1	5	1	5
		4-10	19	4-10	19
		3-100	50	3-100	50
Ground Vibration <sup>2</sup>		Continuous Vibration (mm/s)	Intermittent Vibration (mm/s)	Continuous Vibration (mm/s)	Intermittent Vibration (mm/s)
	Residential Areas	5	10	5	10
	Industrial and Commercial Areas	15	30	15	30

<sup>1</sup> National Vibration Limits occurring at ground at sensitive receptors close to mining operations

<sup>2</sup> National Vibration Limits occurring at ground at sensitive receptors close to construction activities

**Note:** The Turkish limit values defined in Table-6 and Table-7 of Annex VII of *Regulation on the Assessment and Management of Environmental Noise* (Official Gazette numbered 27601, dated 04.06.2010)

**Table 2-7: Soil Standards**

Measured Parameters		Turkish Regulatory Limits	
		Ingestion of soil or dermal contact (mg/kg oven dry soil)	Outdoor inhalation of fugitive dust (mg/kg oven dry soil)
	Units		
<b>Extractable Metals / Major Cations</b>			
Antimony	mg/kg	31	-
Arsenic	mg/kg	0.4	471
Barium	mg/kg	15643	433702
Beryllium	mg/kg	0.1	843
Cadmium	mg/kg	70	1124
Chromium	mg/kg	235	24
Cobalt	mg/kg	23	225
Copper	mg/kg	3129	-
Lead	mg/kg	400	-
Mercury	mg/kg	23	-

Measured Parameters		Turkish Regulatory Limits	
		Ingestion of soil or dermal contact (mg/kg oven dry soil)	Outdoor inhalation of fugitive dust (mg/kg oven dry soil)
	Units		
Molybdenum	mg/kg	391	-
Nickel	mg/kg	1564	-
Selenium	mg/kg	391	-
Silver	mg/kg	391	-
Thallium	mg/kg	5	-
Tin	mg/kg	46929	-
Vanadium	mg/kg	548	-
Zinc	mg/kg	23464	-
<b>Aliphatic Fractions of Petroleum Hydrocarbons</b>			
Total Petroleum Hydrocarbons (Aliphatic) (EC5 - EC8)	mg/kg	4693	-
Total Petroleum Hydrocarbons (Aliphatic) (EC8> - EC16)	mg/kg	7821	-
Total Petroleum Hydrocarbons (Aliphatic) (EC16> - EC35)	mg/kg	156429	-
<b>Aromatic Fractions of Petroleum Hydrocarbons</b>			
Total Petroleum Hydrocarbons (Aromatic) (EC5 - EC9)	mg/kg	15643	-
Total Petroleum Hydrocarbons (Aromatic) (EC9> - EC16)	mg/kg	1564	-
Total Petroleum Hydrocarbons (Aromatic) (EC16> - EC35)	mg/kg	2346	-

**Table 2-8: Drinking Water Standards**

Parameter	Units	Turkish Standard	EU Standard	Project Standard
Aluminium (Al)	mg/l	-	0.2	<b>0.2</b>
Ammonium ion (NH <sub>4</sub> )	mg/l	-	0.5	<b>0.5</b>
Antimony (Sb)	mg/l	0.0005	0.005	<b>0.0005</b>
Acrylamide	mg/l	0.0001	-	<b>0.0001</b>
Arsenic (As)	mg/l	0.01	0.01	<b>0.01</b>
Barium (Ba)	mg/l	-	0.7	<b>0.7</b>
Beryllium (Be)	mg/l	-	0.0002	<b>0.0002</b>
Benzene	mg/l	0.1	-	<b>0.1</b>
Benzopyrene	µg/l	0.01	-	<b>0.01</b>
Boron (B)	mg/l	1.0	0.5	<b>0.5</b>
Bromate	µg/l	10	-	<b>10</b>
Cadmium (Cd)	mg/l	0.005	0.003	<b>0.003</b>
Calcium ion (Ca <sup>2+</sup> )	mg/l	-	100	<b>100</b>
Chloride ion (Cl <sup>-</sup> )	mg/l	-	250	<b>250</b>
Chlorine (Cl)	mg/l	-	5	<b>5</b>
Chromium (Cr)	mg/l	0.05	0.05	<b>0.05</b>
Copper (Cu)	mg/l	2	1	<b>1</b>
Cyanide (CN)	mg/l	0.05	0.01	<b>0.01</b>
1,2-Dichloroethane	µg/l	3	-	<b>3</b>

Parameter	Units	Turkish Standard	EU Standard	Project Standard
Fluoride ion (F <sup>-</sup> )	mg/l	1.5	0.7-1.5	<b>0.7</b>
Hydrogen Sulphide (H <sub>2</sub> S)	mg/l	-	0.1	<b>0.1</b>
Iodine (I)	mg/l	-	1.0	<b>1.0</b>
Iron (Fe)	mg/l	-	0.2	<b>0.2</b>
Lead (Pb)	mg/l	0.01	0.01	<b>0.01</b>
Magnesium ion (Mg <sup>2+</sup> )	mg/l	-	30	<b>30</b>
Manganese (Mn)	mg/l	-	0.05	<b>0.05</b>
Mercury (Hg)	mg/l	0.001	0.0005	<b>0.0005</b>
Molybdenum (Mo)	mg/l	-	0.07	<b>0.07</b>
Nickel (Ni)	mg/l	0.02	0.02	<b>0.02</b>
Nitrate ion (as NO <sub>3</sub> <sup>-</sup> )	mg/l	50	50	<b>50</b>
Nitrite ion (as NO <sub>2</sub> <sup>-</sup> )	mg/l	0.5	1.0	<b>0.5</b>
Phosphate ion (PO <sub>4</sub> <sup>2+</sup> )	mg/l	-	3.5	<b>3.5</b>
Pesticides	µg/l	0.1	-	<b>0.1</b>
Total pesticides	µg/l	0.5	-	<b>0.5</b>
Polycyclic aromatic hydrocarbons	µg/l	0.1	-	<b>0.1</b>
Selenium (Se)	mg/l	0.1	0.01	<b>0.01</b>
Silver (Ag)	mg/l	-	0.1	<b>0.1</b>
Sodium (Na)	mg/l	-	200	<b>200</b>
Sulphate ion (SO <sub>4</sub> <sup>2+</sup> )	mg/l	-	500	<b>500</b>
Strontium (Sr)	mg/l	-	2.0	<b>2.0</b>
Tetrachloroethane and Trichloroethane	µg/l	10	-	<b>10</b>
Trihalomethanes-total	µg/l	100	-	<b>100</b>
Vinyl chloride	µg/l	0.5	-	<b>0.5</b>
Uranium (U)	mg/l	-	0.015	<b>0.015</b>
Vinyl Chloride (C <sub>2</sub> H <sub>3</sub> Cl / H <sub>2</sub> C)	mg/l	-	0.0003	<b>0.0003</b>
Zinc (Zn)	mg/l	-	5	<b>5</b>
<b>Radiological Quality</b>				
Total α radioactivity	Bq/l	-	4	<b>4</b>
Total β radioactivity	Bq/l	-	1	<b>1</b>
<b>Physical Quality</b>				
pH	---		6.5-9.5	<b>6.5-9.5</b>
Taste	Score		As above	
Odour	Score		As above	
Colour	degree		As above	

Notes:

The table shows upper limit values, unless indicated otherwise as a range or lower limit value.

EU Standard is EU Directive 98/83/EC on Drinking Water Quality

EU Standard for radioactivity expressed as Tritium 100 Bq/l with a total indicative dose of 0.1 mSv/year

**Table 2-9: Effluent Wastewater Standard**

Maximum permitted content of pollutants and highest values of the effluent dischargeable into soil shall be as indicated in the table below.

Parameters	Unit	Comparative Standards		Project Standard
		Turkish Standard <sup>1</sup>	EU Guidance <sup>2</sup>	Range or Maximum Allowance
Water temperature	°C	<25	-	<b>25</b>
Odour	Sense	-	-	<b>no odour</b>
pH index	mg0/l	6.5-8.5	-	<b>6.5-8.5</b>
Conductivity	(µS/cm)	< 400	-	<b>&lt;400</b>
Biochemical Oxygen Demand	mg0/l	<4	25	<b>&lt;4</b>
Chemical Oxygen Demand	mg0/l	25-50	125	<b>25-50</b>
Cyanide	mg/l	-	-	<b>0.5<sup>3</sup></b>
Copper	(µg Cu/L)	<20	-	<b>&lt;20</b>
Cadmium	(µg Cd/L)	<2	-	<b>&lt;2</b>
Mercury	(µg Hg/L)	<0.1	-	<b>&lt;0.1</b>
Nickel	(µg Ni/L)	<20	-	<b>&lt;20</b>
Lead	(µg Pb/L)	<10	-	<b>&lt;10</b>
Zinc	(µg Zn/L)	<200	-	<b>&lt;200</b>
Ammonium	mg N/l	0.2	-	<b>0.2</b>
Total nitrogen	mg/l	0.5	15	<b>0.5</b>
Total phosphorus	mg/l	<0.03	2	<b>&lt;0.03</b>
Faecal Coliform	(EMS/100 ml)	<10	-	<b>&lt;10</b>
Total Coliform	(EMS/100 ml)	<100	-	<b>&lt;100</b>

**Notes:**

<sup>1</sup> Turkish Standards relate to Class I 'High Water Quality' which includes surface waters with a high potential for drinking water, recreational purposes, trout production and livestock raising and farming.


<sup>2</sup> EU standards from Directive 91/271/EEC concerning urban waste water treatment

<sup>3</sup> There are no limit values in Turkish or EU legislation. Limit values have been taken from ICMC Guidance. Discharges to surface waters should not exceed 0.5 mg/l WAD cyanide nor result in a concentration of free cyanide in excess of 0.022 mg/l within the receiving surface water body, and downstream of any mixing zone approved by the applicable jurisdiction. WAD cyanide refers to metal cyanide complexes (Zn, Cd, Cu, Hg, Ni, and Ag) that dissociate under weak acid conditions of pH 4.5 to 6. Free cyanide refers to the sum of hydrogen cyanide (HCN) and cyanide ion (CN-) in a sample. Free cyanide is bioavailable and toxic to organisms in aquatic environments.

## 2.6 OMAS Policies

OMAS has adopted the following policies as part of its Environmental and Social Management System (ESMS). The ESMS includes a series of Environmental and Social Management Plans, as described in *Chapter 5: Project Description*.

## 2.6.1 OMAS Health, Safety and Environment Policy

 <h3 style="text-align: center;">HEALTH, SAFETY AND ENVIRONMENTAL POLICY</h3>		
Department: Corporate	Effective Date: February 1, 2015 Revision: Final	Policy No: 001
Management Responsibility:	All Company Employees and Subcontractors' Employees	Author: Corporate Author:
Approved by:	Mike Fisher General Manager	



The ÖKSÜT Gold Company (OMAS) recognizes the protection of the health and safety of its employees, contractors, the public, and the environment as among the highest corporate priorities at all stages of our activities including exploration, construction, operations and decommissioning, and is committed to the safety motto that “no job is so important that we cannot take the time to do it safely” and to the following:

- compliance with applicable laws and regulations of the jurisdictions in which we operate, and generally accepted international industry practices;
- providing employees and contractors with a working environment free of uncontrolled hazards;
- identifying and eliminating or controlling potential risks to health and safety of employees, contractors and the public to levels as low as reasonably achievable, social and economic factors being taken into account;
- prevention of pollution and control of the impacts of our activities on the environment to levels as low as reasonably achievable; and
- achieving continual awareness of and improvement to our overall safety, health and environmental performance.

In support of these commitments, OMAS will:

- 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; and
- make this policy available to the public.

## 2.6.2 OMAS Sustainability Policy

 <b>SUSTAINABILITY POLICY</b>		
Department: Corporate	Effective Date: February 1, 2015 Revision: Final	Policy No: 002
Management Responsibility:	All Company Employees and Subcontractors' Employees	Author: Corporate Author:
Approved by: Mike Fisher General Manager		

### We Believe

- Mining is a positive force for social and economic development.
- We have a responsibility to develop and maintain constructive relationships with host communities.
- Two-way engagement and dialogue will build trust and foster genuine collaboration with local stakeholders.
- We have a responsibility, together with local government and other partners, to mitigate the negative impacts of our operations and to capitalize on opportunities to enhance sustainable socio-economic development.
- Cultural sensitivity, respect and integrity are central to the way we do business and behave as individual employees.
- As a company we are accountable for our actions.

### We Promise

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