



# Environmental & Social Management System

## Hazardous Materials Management Plan

## Hazardous Materials Management Plan

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### 1 INTRODUCTION

#### 1.1 Document Number

This document is the Hazardous Materials Management Plan for the Öksüt Gold Project. The document reference number for this Management Plan is OMAS-ESMS-HM-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;
- define training requirements;
- set out references for supporting materials and information.

#### 1.3 Application

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

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

#### 1.4 Commencement

This Management Plan applies from 1 April 2016.

#### 1.5 Authority and Management

The OMAS Executive Committee approved this Management Plan on 1 March 2016.

This Management Plan is owned by the OMAS Health, Safety, Environment and Training Manager. 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).

### 2.2 Overlaps with other Management Plans

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

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

- the Emergency Response Plan (OMAS-ESMS-ERP-PLN-001), particularly in relation to hazardous material storage;
- the Non-Mineral Waste Management Plan (OMAS-ESMS-NMW-PLN-001), particularly in relation to the management of used container, drums, and spent or expired fuels and hazardous substances including hazardous wastes;
- the Community Health, Safety and Security Management Plan (OMAS-ESMS-CHSS-PLN-001), particularly in relation to potential impacts to the community from hazardous materials.

A separate Cyanide Management Framework (OMAS-ESMS-CY-PLN-001) has been prepared by OMAS which sets out the key approaches and commitments that will be adopted by OMAS and its selected supplier to prepare a detailed Cyanide Management Plan in accordance with the International Cyanide Management Code and Turkish regulatory requirements.

## 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**

<b>Role</b>	<b>Responsibilities</b>
OMAS General Manager	<ul style="list-style-type: none"> <li>• Approval of this Plan and resources required for implementation.</li> </ul>
OMAS Health, Safety, Environment and Training Manager	<ul style="list-style-type: none"> <li>• Ensuring Project compliance with the Project Standards and other requirements set out in this Plan.</li> <li>• Overall responsibility for Plan scope and implementation.</li> <li>• Development, monitoring and revision of this Plan.</li> </ul>

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Role	Responsibilities
	<ul style="list-style-type: none"> <li>Provide training in hazardous materials storage and handling practices to all applicable personnel.</li> </ul>
Environment Coordinator	<ul style="list-style-type: none"> <li>Provide technical support in relation to hazardous materials management to OMAS Managers and Principal Contractors.</li> <li>Periodically audit and inspection operational areas to monitor performance against hazardous materials management plan requirements.</li> <li>Make the Plan available to all OMAS employees and Principal Contractors.</li> <li>Report all hazards, non-conformances and incidents.</li> <li>Provide a system for monitoring the types and quantity of hazardous materials on the site.</li> </ul>
Community Relations Manager	<ul style="list-style-type: none"> <li>Engagement and liaison with local communities.</li> </ul>
Other OMAS Departments and Principal Contractor Managers	<ul style="list-style-type: none"> <li>Undertaken activities in accordance with the requirements of this Plan.</li> <li>Properly store hazardous materials.</li> <li>Provide MSDSs at storage locations.</li> <li>Contractors shall develop their own management plans and inspection procedures, consistent with the requirements outlined in this plan, prior to the commencement of works which will entail handling of hazardous materials.</li> </ul>
Workplace HSE supervisors / Superintendents	<ul style="list-style-type: none"> <li>Conduct routine work area inspections in hazardous materials storage areas.</li> <li>Report all hazards, non-conformances and incidents.</li> </ul>
Procurement Department	<ul style="list-style-type: none"> <li>Purchase from reputable suppliers and obtain relevant MSDS for materials purchased.</li> </ul>

### 3.2 Key Interfaces

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

- OMAS Project Construction Manager, particularly in relation to the safe implementation of activities during construction.
- OMAS Mine Manager Operations, particularly in relation to the safe implementation of activities during operation.
- OMAS Health, Safety, Environment and Training Manager: pre-construction, post construction and operation.
- OMAS Director External Affairs and Sustainability, particularly in relation to community safety issues and labour management issues.
- OMAS Director Finance and Administration, particularly in relation to procurement.

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### 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

Key relevant chemical safety regulations include:

- Regulation on the Inventory and Control of Chemicals (CICR);
- Regulation on the Classification, Packaging and Labelling of Hazardous Materials and Products;
- Regulation on the Preparation and Distribution of Safety Datasheet for Hazardous Materials and Products;
- Regulation on Health and Safety Measures in Working with Chemicals;
- Regulation on Occupational Training of Workers to be Employed in Dangerous Workplaces.

#### 4.2 Turkish EIA requirements

The following key commitments are made in the Turkish EIA related to hazardous materials management:

- Transportation, storage and use of [the mentioned] chemicals will be carried out in compliance with the applicable regulations on the control and transportation of dangerous chemicals and with the Material Safety Data Sheet (MSDS) individually prepared for each material.
- For all chemicals, labels showing the characteristics defined in Material Safety Data Sheets (MSDS), rules of use and issues to be taken into account during storage will be hung at required places and thus, necessary precautions will be taken in order to clean the spilled material.
- During the transportation of [the above-mentioned] materials to the site, all the provisions related to human health and environment in the applicable regulations will be complied with.

#### 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).

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EBRD PR 3: *Pollution Prevention and Abatement* defines EBRD requirements related to health and safety. Key elements related to occupational health and safety are summarised below.

**Table 1: Key Applicable Requirements of EBRD PR3**

Para	Key Requirements
23	In all activities directly related to the project, the client will avoid or minimise the use of hazardous substances and materials, and consider the use of less hazardous substitutes for such substances and materials so as to protect human health and the environment from their potentially harmful impacts. Where avoidance or substitution is not feasible, the client will apply appropriate risk management measures in order to minimise or control the release of such substances/materials into air, water and/or land resulting from their production, transportation, handling, storage, use and disposal relating to project activities.
24	The client will avoid the manufacture, trade and use of hazardous substances and materials subject to international bans or phase-outs due to their high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential for depletion of the ozone layer.

#### **4.5 Applicable Centerra and OMAS Standards, Policies and Procedures**

The Project will align with Centerra's Handling of Hazardous Materials Standard.

#### **4.6 Other industry guidelines with which OMAS has committed to comply**

The Project is committed to also take account of other international standards which represent good practice such as the EU REACH regulations (EC 1907/2006) as the approach to avoiding the use of hazardous materials and the desire to progressive substitution of the most dangerous chemicals when suitable alternatives have been identified.

#### **4.7 Summary of Applicable Project Standards**

OMAS will comply with the more stringent of national standards, applicable EBRD requirements and applicable Centerra Standards, with these more stringent standards representing the Project Standards.

The Project will identify and assess the characteristics and environmental hazards and risks associated with hazardous materials and implement spill prevention controls associated with the transport, storage, use, transfer and disposal of hazardous materials, including failures of secondary containment structures.

### **5 MITIGATION MEASURES AND MANAGEMENT CONTROLS**

#### **5.1 Summary**

This Management Plan is also supported by the following procedures and guidelines, which present more details on specific aspects of the day-to-day hazardous materials management activities at OMAS:

- Hazardous Materials Management Procedure (to be prepared), related to the management of hazardous materials and fuels.
- Incident Management Procedure (to be prepared), related to the event of an incident involving hazardous and/or toxic materials.



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- Blasting Standard Work Procedures (to be prepared), related to the handling and storage of explosive materials.
- Spill Response Procedure (to be prepared), related to hazardous materials spill prevention and control.

Other Procedures may be developed, as required, to support the Hazardous Materials Management Plan in addition to the above procedures.

The general intent of this Management Plan is to ensure sound hazardous materials management at OMAS by the safe and appropriate transport, handling and storage of hazardous materials. This is achieved through the implementation of the management controls designed to minimise health, safety and environmental related to hazardous materials in accordance with Turkish and international standards. Hazardous materials will be managed in accordance with relevant Turkish and international laws and standards.

The table below presents the key management controls that OMAS will implement. These controls are supported by specific implementing Procedures.

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**Table 2: Key Management Controls**

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
HM01	Material assessment and selection	Selection of all hazardous materials	All hazardous materials will be evaluated in accordance with regulatory requirements and OMAS guidelines. Such assessments will be undertaken by a suitably qualified and experienced person and approved by the H&S and Training Manager.	<ul style="list-style-type: none"> <li>• Health, Safety, Environment and Training Manager</li> <li>• Procurement</li> <li>• Operational Departments</li> <li>• Principal Contractors</li> </ul>	<ul style="list-style-type: none"> <li>• Chemical and hazardous materials register and records</li> <li>• Records for hazardous substance approval</li> <li>• Hazardous Materials Management Procedure(s)</li> </ul>
HM02	Hazardous material inventory	Storage of hazardous materials	Material Safety Data Sheets (MSDSs) will be provided for all stored materials in Turkish and English. These will be available in the storage locations and principle points of use.	<ul style="list-style-type: none"> <li>• Health, Safety, Environment and Training Manager</li> <li>• Principal Contractors</li> </ul>	<ul style="list-style-type: none"> <li>• Hazardous Materials Management Procedure(s)</li> <li>• Internal audit programme and records</li> <li>• Visual confirmation of MSDSs at storage areas</li> </ul>

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
HM03	Storage procedures	Storage of hazardous materials	Storage of liquid hazardous materials (including waste oil and solvents) will be provided with 110% capacity secondary containment.	<ul style="list-style-type: none"> <li>• Health, Safety, Environment and Training Manager</li> <li>• Operational Departments</li> <li>• Principal Contractors</li> <li>• Environment Coordinator</li> </ul>	<ul style="list-style-type: none"> <li>• Storage design</li> <li>• Internal audit programme</li> <li>• Visual inspections</li> <li>• Hazardous Materials Management Procedure</li> </ul>
HM04	Storage procedures	Storage of hazardous materials	Waste oils will not be stored for extended periods in underground sumps; tanks and sumps will be emptied and inspected regularly for any signs of cracks or holes. The findings of the inspection will be recorded; any cracks or holes will be repaired, and any repairs conducted will be recorded.	<ul style="list-style-type: none"> <li>• Health, Safety, Environment and Training Manger</li> <li>• Operational Departments</li> <li>• Principal Contractors</li> <li>• Environment Coordinator</li> </ul>	<ul style="list-style-type: none"> <li>• Internal audit programme</li> <li>• Visual inspections</li> <li>• Hazardous Materials Management Procedure</li> </ul>
HM05	Storage procedures	Storage of hazardous materials	Spill kits, protective equipment, and other necessary equipment will be available onsite, where hazardous materials are handed, to clean and mitigate spills.	<ul style="list-style-type: none"> <li>• Health, Safety, Environment and Training Manager</li> <li>• Operational</li> </ul>	<ul style="list-style-type: none"> <li>• Internal audit programme</li> <li>• Visual inspections</li> <li>• Hazardous</li> </ul>

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
				Departments <ul style="list-style-type: none"> <li>• Principal Contractors</li> <li>• Environment Coordinator</li> </ul>	Materials Management Procedure
HM06	Storage procedures	Storage of hazardous materials	Appropriate first aid will be located close to hazardous material storage areas such as eye-wash, showers, and first aid kits.	<ul style="list-style-type: none"> <li>• Health, Safety, Environment and Training Manager</li> <li>• Operational Departments</li> <li>• Principal Contractors</li> </ul>	<ul style="list-style-type: none"> <li>• Internal audit programme</li> <li>• Hazardous Materials Management Procedure</li> </ul>
HM07	Transport of hazardous materials (general)	Transport of hazardous materials	Hazardous materials will only be transported by operators licensed and/or approved by OMAS for the specific material.	<ul style="list-style-type: none"> <li>• Health, Safety, Environment and Training Manager</li> <li>• Principal Contractors</li> <li>• Environment Coordinator</li> </ul>	<ul style="list-style-type: none"> <li>• Internal audit programme</li> <li>• Visual inspections</li> <li>• Hazardous Materials Management Procedure</li> </ul>
HM08	Transport, storage, use and disposal of cyanide	Cyanide management	A Cyanide Management Plan, to meet the requirements of the International Cyanide Management Code will be prepared and implemented prior to the commencement of operations and prior to the first cyanide shipment to the Project. The Plan will cover all aspects of the transport,	<ul style="list-style-type: none"> <li>• Health, Safety, Environment and Training</li> <li>• Cyanide</li> </ul>	<ul style="list-style-type: none"> <li>• Cyanide Management Plan</li> <li>• Internal audit</li> </ul>

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
			<p>storage, use and disposal of cyanide.</p> <p>OMAS will be certified to the International Cyanide Management Code and independent audits will be undertaken as required by the Code.</p>	<p>supplier</p> <ul style="list-style-type: none"> <li>• Environment Coordinator</li> </ul>	<p>programme</p> <ul style="list-style-type: none"> <li>• Visual inspections</li> <li>• External audits</li> </ul>

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## 6 IMPLEMENTATION SCHEDULE

### 6.1 Review and Revision of this Management Plan

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

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

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

## 7 MONITORING

### 7.1 Overview of Monitoring Requirements

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

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

### 7.2 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 3: Key Performance Indicators and Monitoring Measures**

ID	KPI	Target	Monitoring Measure
HM-KPI01	Number of reported non-compliances with the mitigation controls identified in this Management Plan.	Target: Zero per year Minimise and continued improvement in number of reported non-compliances	See ‘means of verification’ column in Table 2
HM-KPI02	Number of reported incidents of hazardous material releases leading to actual or potential harm to humans or the environment.	Target: Zero per year Minimise and continued improvement in reducing the number of reported incidents	Auditing

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### 7.3 Key Monitoring Activities

The monitoring measures to be implemented to ensure compliance with legal and other requirements and the Project Standards are described below.

In the event that any monitoring results identify a non-conformance with the Project Standards, these will be investigated and corrective actions identified (ESMS Framework for further details). The Project will develop and implement a hazardous materials management audit/inspection programme (for OMAS and Contractor activities) to verify compliance with applicable Project Standards. Specific monitoring requirements are further detailed below.

Key monitoring measures are set out below.

**Table 4: Key Monitoring Measures**

ID	Topic Aspects	Parameters	Methods	Periodicity	Location
HMM01	Hazardous Materials Inventory	Volumes of Hazardous Materials	OMAS will maintain an inventory of all hazardous materials purchased, delivered, stored and used.	Monthly updates	N/A
HMM02	Hazardous Materials handling	Various	OMAS will collect and maintain records on hazardous substances for the following: <ul style="list-style-type: none"> <li>reconciled bulk inventory;</li> <li>weekly use summaries;</li> <li>weekly reconciliation for each storage area;</li> <li>overflow alarm tests;</li> <li>pressure tests (if applicable);</li> <li>inspections and maintenance checks of storage tank system, piping and delivery system;</li> <li>any alteration to the system;</li> <li>reports of leaks or losses; and</li> <li>reports of spill responses.</li> </ul>	Weekly/ various	N/A

## 8 TRAINING

### 8.1 Overview

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

### 8.2 Induction Training

All employees of OMAS and Contractors will be provided with general induction, site specific induction and a broad range of health, safety and environmental awareness training, including a specific course

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awareness module on hazardous material management. Procedures and training in relation to a spill or other emergency are described in the OMAS Emergency Response Plan (OMAS-ESMS-ERP-PLN-001).

Appropriate Personal Protective Equipment (PPE) will be made available to personnel involved in hazardous substance handling operations. All relevant personnel will be trained in the use and maintenance of protective equipment.

### 8.3 Job-Specific Training

All employees working at OMAS hazardous material management activities shall be subject to routine toolbox training. This will include details on the importance of adequate hazardous material management including safe storage and handling requirements.

Hauliers of hazardous materials will have appropriate training, and hauling will be undertaken in a manner that prevents inadvertent off-site release of hazardous materials in transit.

### 8.4 Other Training Requirements

Additional, specialist training shall be provided to key personnel involved in activities which involve the use, storage or haulage of hazardous materials.

When appropriate, competencies in emergency response scenarios must be obtained.

All employees of OMAS and Contractors to OMAS are provided with basic training on health, safety and security, including health awareness training and induction in the OMAS Code of Ethics. Additional specialist training is to be provided to the personnel involved in the transport, storage and use of cyanide as defined in the Cyanide Management Plan.

## 9 AUDIT AND REPORTING

### 9.1 Auditing

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

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

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

All incidents and non-conformances will be reported as per the requirements of the OMAS ESMS Management System as described in the ESMS Framework.

### 9.2 External Auditing

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

### 9.3 Record Keeping

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



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## 10 DOCUMENT CONTROL

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