



Environmental & Social Management System

Labour Management Plan

Labour Management Plan		
Effective Date: 01.04.2016	Document Number: OMAS-ESMS-LM-PLN-001	Rev: 1

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1 INTRODUCTION

1.1 Document Number

This document is the Labour Management Plan for the Öksüt Gold Project. The document reference number for this Management Plan is OMAS-ESMS-LM-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.

This Management Plan set out the basic procedures and requirements implemented by OMAS to ensure that OMAS and its Contractors respect and protect the fundamental principles and rights of workers through promoting a decent work place. This includes:

- fair treatment;
- non-discrimination and equal opportunities of workers;
- establishing, maintaining and improving a sound worker-management relationship;
- promoting compliance with any collective agreements to which OMAS is a party,
- compliance with national labour and employment laws;
- protecting and promoting the safety and health of workers, especially by promoting safe and healthy working conditions;
- preventing the use of forced labour and child labour (as defined by the ILO and Turkish legislation).

Implementation of the Labour Management Plan is also central to maximising the opportunities for local employment and ensuring a fair distribution of jobs to all affected settlements. This is vital to establishing a good relationship between the Project and the local settlements. Therefore this Management Plan also aims to outline the skills development and training process to ensure that local settlements can benefit from the Project in the longer term by developing skills that can help them find employment once the Project is completed. The Management Plan will help Construction Contractors ensure they meet the requirements set out in Tender documentation for managing employment.

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

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

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) and include full-time and part-time workers including those on short-term contracts.

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 OMAS ESMS Framework.

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

- the Contractor Management Framework (OMAS-ESMS-CM-PLN-001), particularly in relation to the procedures for the selection, management and oversight of OMAS contractors related to labour management issues;
- the Community Development Framework (OMAS-ESMS-CD-PLN-001) in relation to local recruitment, employment and training;

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- the Livelihood Restoration Framework (OMAS-ESMS-LR-PLN-001);
- Health and safety management procedures as developed and implemented by OMAS.

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 and 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 Human Resources Manager	<ul style="list-style-type: none"> • Maintaining HR records. • Processing HR transactions. • Regulatory compliance related to recruitment, employment and training. • Reporting to government and other bodies on compliance with commitments and on other occasions as required by legislation.
Line Managers	<ul style="list-style-type: none"> • Responsible for the application of Human Resources Policies, Procedures and Standards in work teams. • Responsible for performance assessments fitness for work and training of workforce. • Report on Plan implementation.
All Employees	<ul style="list-style-type: none"> • Being familiar with Human Resources management procedures through Induction and Other company provided training and communications.

Individual roles and responsibilities related to human resources management and training are set out in individual job descriptions.

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 implementation of OMAS Human Resources policies;

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- OMAS Mine Operations Manager, particularly in relation to the implementation of OMAS Human Resources policies;
- OMAS Director Administration and Finance, particularly in relation to Contractor contract compliance;
- OMAS Human Resources Manager, particularly in relation to labour management;
- OMAS Health, Safety, Environment and Training Manager, particularly in relation to worker health & safety issues.

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

Occupational Health and Safety

All occupational health and safety issues are managed in line with the *Occupational Health and Safety Law* (Law No: 6331, Date of Enactment: 20/06/2012).

Labour Law

The *Labour Law* (Act. No. 4857) regulates the individual employment relations between an employer and an employee. The law covers both the employment contract of blue and white collar employees, but excludes public service employees.

Turkish Health and Safety Standards

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

- Regulation for Manual Handling Operations in Workplaces
- Regulation on Health and Safety Measures in Working with Chemicals
- Regulation on Personal Protective Equipment
- Health and Safety Regulation for Mining Works
- Regulation on Health and Safety Signs
- Regulation on Dust Control
- Regulation on Occupational Health and Safety in Construction Works

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

4.2 Turkish EIA requirements

There are no specific requirements in the EIA and associated Permits submitted for the OMAS project directly related to labour management.

4.3 OMAS Commitments to and Requirements of Turkish Government Authorities

International Labour Organisation Conventions Ratified by Turkey

Turkey has ratified a wide range of International Labour Organisation (ILO) Conventions including the following:

- Forced Labour Convention, 1930
- Minimum Age (Industry) Convention (Revised), 1937
- Labour Clauses (Public Contracts) Convention, 1949
- Protection of Wages Convention, 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
- Equality of Treatment (Social Security Convention, 1962
- 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

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- Termination of Employment Convention, 1982
- 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
- Protection Framework for Occupational Safety and Health Convention, 2006

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).

Under EBRD Performance Requirement 2 *Labour and Working Conditions*, proper human resources management, respect for workers' rights, including freedom of association and the right to collective bargaining, and promotion of workers' health are key to the sustainability of an enterprise. Management of non-employee workers, the process of redundancy and grievances arising at the workplace are also covered by the standard.

OMAS will comply with the requirements of EBRD Performance Requirement 2 when implementing its policies.

4.5 Applicable Centerra and OMAS Standards, Policies and Procedures

OMAS has developed a number of policies and procedures to govern the labour recruitment and management process, including:

- Human Resources Policy (OMAS-HR-POL-001)
- Respectful Workplace Policy (OMAS-HR-POL-002)
- HR Policy and Procedure (OMAS-HR-PRC-001)
- Employee Grievance Procedure (OMAS-HR-PRC-002)
- Recruitment Policy and Procedure (OMAS-HR-POL-003)
- Local Employment and Training Procedure (OMAS-HR-PRC-004)
- Recruitment Procedure for Contractors (OMAS-HR-PRC-005)

4.6 Other industry guidelines with which OMAS has committed to comply

None applicable.

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.

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5 MITIGATION MEASURES AND MANAGEMENT CONTROLS

5.1 Summary

A range of mitigation measures have been developed to manage risks and impacts identified in the Project ESIA. The key management controls are set out below together with references to documentation where further information on implementation is set out.

5.2 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 Öksüt Project.

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Table 2: Key Management Controls

ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
L01	Legal	Compliance	OMAS will implement policies and procedures to comply with the labour laws of Turkey, relevant EBRD Standards and Requirements and the core conventions of the ILO (as set out in Section Error! Reference source not found.). Compliance will be monitored through Personnel Database and Records System.	OMAS Director External Affairs and Sustainability	Personnel Database and Records System.
L02	Employment	Implementation of hiring policies and procedures	<p>OMAS will implement and comply with the following labour relations policies and procedures:</p> <ul style="list-style-type: none"> • Human Resources Policy • Employee Grievance Procedure • Local Employment and Training Procedure • Recruitment Policy and Procedure • Respectful Workplace Policy • Code of Ethics <p><i>Information: As part of induction, workers and contractors are provided with training on the Code of Ethics which sets out that OMAS will not tolerate gender based violence</i></p>	OMAS Director External Affairs and Sustainability	Policy and Procedure
L03	Redundancy	Implementation of redundancy and closure procedures	OMAS will ensure that any Collective Redundancies will be undertaken within the framework of the OMAS Human Resources Policy and this Labour Management Plan. This will include develop of a formal Retrenchment Plan as outlined in this Plan.	OMAS Director External Affairs and Sustainability	Policy and procedure

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ID	Topic/ Aspect	Applicability/ Activity	Control Description	Responsible Parties	Means of verification
L04	Training	Ensuring access to employment for local workforce	OMAS will provide training for operations workforce and construction workers transferring to operations to ensure that OMAS has access to an appropriately skilled and trained workforce. This training may range from task specific on-the-job training to more formal vocational training, depending on the needs of the individual and OMAS. This will be undertaken within the framework of the OMAS Local Employment and Training Procedure.	OMAS Human Resources Manager OMAS Health, Safety, Environment and Training Manager	Employee records

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6 OMAS Labour Management Principles and Practises

6.1 Key Labour Management Principles

1. OMAS is committed to ensure compliance of its own operations and those of any contractors or sub-contractors working at the Project with the provision of the following:
 - The Turkish Labour Law
 - Ratified ILO Conventions; and
 - EBRD Performance Requirement 2.
2. OMAS has specific policies in place intended to maximise beneficial impacts of the Project and to minimise or mitigate its potential adverse impacts:
 - a hiring policy that prioritises Kayseri residents and Turkish citizens for employment, thus maximising socio-economic benefits in communities closest to operations;
 - specific anti-discrimination policies and grievance management procedures.

Key management measures are presented below in a thematic order (hiring, terms of employment, anti-discrimination and grievances, workers accommodation, unions and collective bargaining, contractor and supply chain management).

6.2 Key Labour Management Measures

Hiring - Identifying Labour Needs

Forecasting workforce requirements in a systematic and timely fashion is important for the Project to ensure that sufficient time and internal resources are available to identify and find suitable local/regional candidates for all unskilled, semi-skilled and skilled positions. The procedure for identifying labour needs is detailed in the OMAS Local Employment and Training Procedure.

Recruitment and Hiring Procedure

OMAS has designed a range of policies and procedures designed to ensure that recruitment and hiring practices are fair and transparent, and that they take into consideration local conditions and expectations to the greatest extent possible.

Discrimination in relation to recruitment and employment on the grounds of race, gender, age, disability, sexual orientation, or religious or political beliefs is not permitted under any circumstances.

A Recruitment Policy and Procedure has been developed by OMAS and contains key recruitment processes, including the following:

- identifying Project recruitment needs and staffing requirements;
- developing and reviewing job descriptions in a standard OMAS template. All job descriptions are to be composed by the responsible line managers in competency-based terms and will provide an appropriate level of detail in terms of job specifications and requisite qualifications;
- advertising and selection of recruitment agencies;
- management of candidates;

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- candidate short listing and selection;
- new employee administration.

Project contractors are required to implement equivalent recruitment procedures and to have all associated documentation in place.

Human Resources practices and procedures are being progressively developed, implemented and updated as the Project moves towards operations.

Preferential Local Employment

In the process of employee selection, the Project gives preference to local workers from the *neighbourhoods* directly affected settlements in the local area and Develi District. This is a key element of the Project community development strategy. However, due to the need for specialised and experienced workers, some recruitment elsewhere in Kayseri Province, other Provinces of Turkey and internationally is inevitable.

Opportunities for direct employment will be constrained by the availability of appropriate skills. Taking into consideration the skills limitation within the affected area, the focus of the employment strategy will be employment of the unskilled and semi-skilled workforce if necessary. Preliminary employment targets are as follows:

Category	Settlements in the Project Area	District-Provincial (Develi-Kayseri)	Turkish Nationals
Unskilled	100%	100%	100%
Semi-skilled	70%	30%	100%
Skilled	-	50%	90%

Information Provision as part of Recruitment Process

Dissemination of all recruitment advertisements for the Project is controlled by the respective employer, i.e. either OMAS (for direct Project recruitment) or Project Contractors. Recruitment procedures in relation to information provision include the following:

- vacancy announcements and advertisements must have appropriate approvals from OMAS;
- OMAS and its contractors will ensure that relevant announcements are made for all available vacancies;
- means of information distribution include advertising of employment opportunities in the local daily newspapers, online resources (including www.yenibiris.com and www.kariyer.net);
- the Human Resources Coordinator is responsible for the public distribution of vacancy announcements and provides advertising support for the internet;
- for specialist roles, professional recruitment firms may also be used.

OMAS community liaison officers will inform local residents about the application process and of conditions for employment. Appropriate communications channels will be used to ensure that all directly affected settlements are informed, for example, through advertisements and notices in the media, through village leaders, notices in tea houses etc.

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6.3 Terms of Employment

Categories of Employment and Employment Eligibility

OMAS defines two main categories of employees for its workforce:

- Permanent Employees.
- Temporary Employees (or Contractors).

All recruitment information and employment contracts will specify an employee category and duration of the employment term.

Permanent Employees represent the Project personnel who have indefinite employment appointments. OMAS has introduced position grades, defined in the relevant Human Resource documentation, that cover the range of skilled, semi-skilled and unskilled workers. Employee grades designate the ranges of remuneration rate and other employment-related factors, such as benefits, annual leave, etc.

Temporary Employees (or Contractors) represent members of the workforce who are hired for a specified term for a particular task assignment. Contractor positions fall into three subcategories: skilled, semi-skilled, and non-skilled.

Project Contractors and Sub-Contractors are required to document whether available positions are for the full period of the contractor's deployment with the OMAS Project or are temporary appointments, and to indicate the duration of each employment contract. The length of assignment for each temporary position must be specified so that candidates are fully aware that the appointments are not permanent. This is particularly important for people in the local communities who may not have had previous experience with waged or temporary employment and may assume that all jobs will be permanent. Specific efforts shall be made to ensure proper understanding of the written provisions in contracts, with specific verbal explanations delivered individually in a simple and understandable manner to avoid any confusion with respect to the duration and terms of employment.

Basic eligibility requirements for employment are as follows:

- all applicants must complete an application form and submit a CV detailing applicable experience related to the minimal (required) and desirable qualifications;
- applicants must be at least 18 years of age on the date of hire for all positions;
- citizens convicted of a criminal act by a legal court and currently serving their sentences are not eligible for appointment;
- preference is given to residents from the neighbourhoods in the directly affected settlements and Develi District (as outlined in the Local Employment and Training Procedure);
- medical clearance to be fit for work.

Work Contracts, Working Hours and Vacation

Contracts of employment shall be in writing and may be for a fixed term or for permanent employment. All employees will receive a copy of their employment agreement, which will, as a minimum, address the following:

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- job title;
- job duties;
- basic salary;
- labour conditions.

Working hours will be in compliance with Turkish Labour Law. All relevant attendance and leave requirements are set out in individual employment contracts and other relevant Human Resources documentation.

Labour Remuneration

All wages and salaries paid to employees and Contractors must accord with the HR policies of OMAS.

All employees of the Project and contractors must be provided with an employment contract that clearly sets out their salary conditions and other allowances.

Employees (local or regional workers) at OMAS will be provided a competitive salary in relation to market rates. Social security, government health insurance, workers' compensation, state disability and unemployment insurance are requirements of the Turkish Labour Law and Social Security Institution and are documented through written employment agreements. In addition to this, the Company will consider annual changes to pay scales due to inflation using rates issued by the Central Bank of Turkey.

Termination and Redundancy

All worker terminations will be performed strictly according to Turkish legal requirements and OMAS policies. OMAS will establish procedures to guide the redundancy of employees at mine closure and to deal with unforeseen events during operations. Key elements will include:

- at the time of hiring, the period of employment and the conditions for hiring and layoff will be clearly explained to new recruits and recorded in individual employment contracts;
- during regular meetings held with worker representatives, personnel management will share information on the Project's schedule and potential layoffs (particularly for temporary construction jobs);
- the Project intends to avoid Collective Redundancies (as defined in EBRD PR2);
- the Project is responsible for returning workers to the place from where they were recruited or to their domicile (the place of hire will be specified and transport service or cost of transportation will be covered).

Redundancy does not include the planned cessation of temporary employment, such as the demobilisation of contractor workers at the end of their assignment.

Responsibility for further development of the redundancy procedures lies with the Human Resources Department of OMAS.

Collective Redundancies

Collective Redundancies are defined as follows (EBRD - PR2, making reference to Article 1 of EU Directive 98/59): *"dismissals effected by an employer for one or more reasons not related to the individual workers concerned where the number of redundancies is, over a period of 30 days:*

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Total no. of employees in Company	Threshold for “Collective Redundancy”
up to 20	Not applicable
21 to 99	10%
100 to 299	10%
300 or more	30%

In the event that Collective Redundancies as defined above cannot be avoided, they will be managed as follows (these requirements apply to both OMAS and Contractors or Sub-Contractors):

- 30 days’ notice of redundancy will be given.
- Consultation will be made with trade unions or workers’ representatives (where there are no trade unions) on amounts of severance pay.
- Severance will be paid in the amount of: either one month’s base pay as a minimum, or the amounts agreed in consultation with unions or workers’ representatives.
- Selection criteria for those to be retrenched will be transparent and may be based on the following:
 - length of service;
 - skills assessment;
 - disciplinary record;
 - performance record;
 - absence record;
 - knowledge
- A formal Redundancy Plan shall be prepared for consultation with workers and shall include the following sections:
 - the reasons why job losses are necessary;
 - the timescale;
 - Who will be consulted;
 - How employees will be selected;
 - How alternative jobs will be sought;
 - How severance pay will be calculated;
 - What measures are in place to assist those losing their jobs to seek new work;
 - How broader community impact issues are to be addressed.
- Any proposed Collective Redundancies as defined above shall be notified in advance to Lenders. Notification will include the reason for the proposed redundancy, the number of workers affected, and the time frame.

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- In the unlikely case of a large-scale Collective Redundancy – where either 25% or more of the workforce or over 500 workers are to be dismissed – OMAS shall provide lenders with an advance copy of the redundancy plan prepared by OMAS or the relevant Contractor or Sub-Contractor.

6.4 Anti-Discrimination Policies and Grievance Management

OMAS is enforcing a comprehensive Respectful Workplace Policy (OMAS-HR-POL-002) that covers the entire workforce. This policy ensures that all employees are treated fairly, with dignity and respect, and have equal employment opportunities.

The system also includes a Whistle-blower and Reporting Policy (OMAS-GEN-POL-002), which provides employees with an authorised process for raising concerns to senior management, covering any issues that are work related, that affect an employee or contractor, or that an employee deems unfair. Such concerns may relate (but are not limited) to the following:

- the decision of a manager;
- the behaviour of another employee, manager, or contractor;
- the application of a company policy.

OMAS will ensure that all issues raised by employees under the Whistle-blower and Reporting Policy are treated earnestly, impartially, respectfully, and confidentially. Employees are kept apprised of the progress of the grievance and the process ensures strict timeframes for resolution.

Employees are informed of the Whistle-blower and Reporting Policy at their induction.

OMAS has an Employee Grievance Procedure (OMAS-HR-PRC-002) that sets out the procedures to be followed in the case of employee grievances. Contractors working for OMAS will be required to implement similar employee grievance procedures.

6.5 Workers Accommodation and Transportation

Worker Houses

There are no plans for an on-site mine camp. If a temporary contractor camp is required during construction it will be built in line with Turkish requirements and IFC/EBRD *Workers Accommodation Guidelines*. All offsite worker accommodation will be reviewed by OMAS to ensure they are in line with the *Workers Accommodation Guidelines*.

OMAS aims to recruit 100% of unskilled and 70% of semi-skilled employees from local villages. These workers will continue to live at home and will travel to the mine site by bus each day.

It is expected that the remainder of employees will be recruited nationally and will live in Develi. A shuttle bus system will transport staff between the mine and residential areas.

Work Rotations and Transportation

The current plan for work rotations and transportation requirements can be summarised as follows:

- All Turkish workers recruited and employed from Develi District will work on a three shift basis and will be transported by bus (Bus-In Bus-Out ('BIBO')) from and to Develi centre.

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- All Turkish employees recruited and employed on a “non-local” basis will work on a range of different roster patters, and will be based in rented accommodation in Develi during their ‘on’ weeks. These employees will be commute to work by BIBO.

6.6 Unions and Bargaining

Unions and Workers Representation

The Project endeavours to work in good faith with trade unions and any other bodies that employees collectively choose for their formal representation. Organised workforces are common in Turkey.

OMAS has a range of policies in place and will implement, at minimum, the following:

- the Project will not seek to prevent by any means whatsoever the formation of trade unions or any other legally-established worker group(s);
- OMAS and its contractors will comply with Turkish Labour Law concerning relations with authorised labour organisations and workers representatives;
- in the case of a stoppage of work or strike, OMAS will ensure that relevant managers, contractors and other parties are informed promptly so that appropriate engagement and action can be undertaken to resolve the issue;
- in the event of stoppage or strike, OMAS will arrange meetings with designated labour/worker representatives to determine the cause and to discuss and agree on resolutions; and
- If necessary, the relevant requirements of the Labour Law will be exercised, including using legal mediation and other means of arbitration.

Collective Agreement

The right to negotiate collectively at different levels (including sector and enterprise) is recognised under Turkish Labour Law. In collective bargaining, workers will be represented by a trade union or, if there is no trade union, by representatives elected from a meeting of employees. If, in the future, there are multiple trade unions that are relevant to collective bargaining negotiations, the unions are required to form a single negotiating body with participation relative to the proportion of workers that they represent.

Collective agreements will be negotiated by OMAS and all major contractors working at Project sites, will be registered, and will be renegotiated as required, with an adequate period of notice given to Unions or workers representatives, as required by the Turkish Labour Law, before the formal renegotiation process starts.

6.7 Management of Contractors and Supply Chain

Management of Direct Contractors

Contractors and Sub-Contractors working at the Project sites shall comply with all OMAS standards and requirements (as appropriate and as defined in this plan, the Contract Management Framework and as set out in contractor contracts). OMAS shall ensure that contractual provisions reflect these requirements. Compliance by Contractors and Sub-Contractors will occur either by adopting OMAS policies and procedures or by implementing their own equivalent procedures that are approved by OMAS.

The contractor workforce will be accommodated in local towns, such as Develi. OMAS and the main Contractors will approve sub-contractor accommodation and facilities to ensure that they meet applicable

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OMAS standards for worker accommodation. Labour and working conditions for contractors and their adherence to the applicable policies and requirements will be monitored by the Human Resources Department.

Compliance verification will be used to assess contractors' performance against OMAS procedures, applicable Turkish Law, and international standards (particularly those of EBRD). Audits may be conducted directly by the OMAS Human Resources Department or by authorised government inspection agencies.

During construction, audits of Contractor HR policies, procedures and performance will be undertaken on a quarterly basis against Turkish regulatory requirements and OMAS requirements. During operations, audits will be undertaken on an annual basis as a minimum.

The focus of Contractor monitoring will be on ensuring that employment arrangements do not contravene applicable Turkish Law or international standards and on monitoring the working and living conditions at Project work sites and in construction camps and accommodation.

Supply Chain Management

All suppliers to the Project will be expected to comply with the Turkish labour standards, with the applicable standards of the ILO and the EBRD's Performance Requirement 4.

Selected supplier standards include the following:

- **Supplier Standards for Employment:** As a minimum, the OMAS suppliers are required to maintain and implement policies to comply with Turkish laws and regulations, and prohibit the employment of forced, bonded or child labour, with a process for assuring compliance.
- **Supplier Standards for Human Rights:** As a minimum, the OMAS suppliers are required to maintain and implement policies that respect basic human rights and dignity, without distinction on any basis, including the rights to life, liberty, and security of person, freedom from slavery and cruelty, and equal protection under applicable Turkish and International laws and constitutions and a process to assure compliance.
- **Supplier Standards for Health and Safety:** As a minimum, the OMAS suppliers are required to maintain compliance with all Health, Safety and Environment (HSE) requirements of OMAS and to demonstrate strong organisational commitment to responsible HSE management and the elimination of workplace injuries and illnesses, with a process for obtaining assurance on compliance with those policies, both internally and externally, by regular audits, reviews and reports.
- **Supplier Standards for Community Relations:** As a minimum, the OMAS suppliers are required to demonstrate organisational commitment to responsible and productive community relationships. Suppliers will commit to this standard by maintaining business relationships that will have a positive and enduring effect on the local communities and neighbours affected by OMAS's operations.

OMAS requires that all suppliers pay specific attention to the management of their subcontractors. All subcontractors must be approved in writing by the Procurement team, and must meet the strict HSE and quality requirements of the contract. Subcontractors failing to comply with OMAS safety requirements will be prevented from future works on the Project OMAS and its associated businesses if they cannot meet the requirements set out above after being requested to bring their procedures into compliance.

Contractor Verification Process

Labour and working conditions for contractors and their adherence to the applicable policies and requirements will be monitored by the Procurement Department. Compliance verification covers recruitment,

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hiring and employment practices, as well as working conditions and training within OMAS Departments and for all key Contractors.

Compliance verification will assess OMAS and Contractors performance against OMAS procedures, Turkish Law, and international standards (particularly those of the EBRD). Compliance verification may be conducted directly by the OMAS Audit Department or externally by third parties hired by OMAS for this function.

Post Mining and Workforce Demobilisation

At the end of the commercial life of the Project OMAS will help its local workforce to transition from an operating mine into the post-closure period, specifically to deal with the impacts of loss of employment and discontinuation of other spin off revenue to local businesses and to governments through taxes. Further details are provided in the Conceptual Closure Framework and Community Development Framework.

The Human Resources Department will work closely with government and private recruitment and training agencies to establish career transition or employee mitigation programmes to ease the impact of closure. Regular community and employee consultation will be critical in establishing the best adjustment programmes to transition effectively from an operating mine to the post closure period, while maintaining local sustainable development.

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 Affairs 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 have access to the latest version of this Management Plan

8 MONITORING

8.1 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).

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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 3: Key Performance Indicators and Monitoring Measures

ID	KPI	Target
L-KPI 01	% of Turkish people in the workforce	<p>As per the terms of OMAS Labour Targets:</p> <ul style="list-style-type: none"> 100% of unskilled and 50% of skilled workforce to be Turkish employees sourced from the local communities surrounding the mine. 100% of unskilled and semi-skilled workforce and 90% of skilled workforce to be Turkish employees for mining and mining related work.
L-KPI 02	% of women in the workforce	<ul style="list-style-type: none"> Increased hiring and employment of women in all employment grades year on year
L-KPI 03	Number of worker grievances not closed out within the target timeframe	<ul style="list-style-type: none"> Zero worker grievances not closed out within the target timeframe set out within the procedure

8.3 Key Monitoring Activities

Monitoring will focus on the following activities:

- the employment and development of employees and those from directly affected settlements and Develi District;
- ensuring discrimination and harassment is not taking place;
- worker/management relations and worker grievances;
- health and safety;
- worker accommodation, particularly in relation with applicable Turkish standards and the guidance contained in the EBRD Guidance Note “Workers Accommodation. Processes and Standards”.

Key monitoring measures are set out below.

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Table 4: Key Monitoring Measures

ID	Topic/Aspects	Methods	Periodicity	Location
LMPm01	Employment	Analysis of records of male/female workforce ratio, including those in managerial positions (supervisors and above)	Annual	OMAS site Ankara Headquarters
LMPm02	Employment	Number of worker grievances submitted, processed and resolved,	Annual	OMAS site Ankara Headquarters
LMPm03	Training	Percentage of employees completing mandatory training as outlined in Personal Training Profiles and the Annual Training Plan	Annual	OMAS site Ankara Headquarters
LMPm04	Policy Implementation	Number of cases of discrimination or harassment reported	Annual	OMAS site Ankara Headquarters
LMPm05	Policy and Procedure Implementation	Review of procedure implementation records	Annual	OMAS site Ankara Headquarters
LMPm06	Contractor Compliance	Review of records by OMAS	Quarterly (construction) Annual (operations)	OMAS site Contractor offices

9 TRAINING

OMAS will ensure that all staff and Contractor employees will undergo induction training where they are made familiar with the Company Policies and Procedures, the relevant national legislation and international regulations. This will also include cultural sensitivity training in order to ensure that employees and contractors maintain respectful relationships with the local communities.

OMAS will provide access to vocational training as a means of building local capacity and ensuring that OMAS meets its skills needs. In addition to the vocational training, employees will receive on-the-job training to build their capacity in specifically identified fields of work. The Training Coordinator will be responsible to organize and carry out the training programs in cooperation with the local organizations, and authorities if necessary.

Contractors will be required to develop and deliver training plans that focus on the transfer skills to their workers.

The Local Employment and Training Procedure (OMAS-HR-PRC-004) sets out requirements for training and career development, which should include provision for on-the-job training and identify the contribution that this strategy will make to the local content of employment and to the future employability of workers. It should therefore focus on skills that are transferable or where there is a future market in the local area (e.g. construction, driving etc.).

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10 AUDIT AND REPORTING

10.1 Auditing

Conformance with this plan will be subject to internal inspection and audit on an annual basis.

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 as described in the ESMS Framework Document.

10.2 Contractor Auditing

Contractors will be subject to inspection and audit by OMAS prior to a contractor's initial appointment and then on an annual basis as outlined in the Contractor Management Framework.

10.3 External Auditing

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

10.4 Record Keeping

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

11 DOCUMENT CONTROL

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