STAKEHOLDER ENGAGEMENT PLAN for LAPSEKİ PROJECT

by TÜMAD Madencilik San. ve Tic. AŞ

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STAKEHOLDER ENGAGEMENT PLAN for LAPSEKİ PROJECT

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ABBREVIATIONS AND DEFINITIONS

Project : Lapseki Gold and Silver Mine and Processing Project
TÜMAD : TÜMAD Madencilik San. ve Tic. A.Ş.
CBO : Civil Business Organisations
CR : Community Relations
EBRD : European Bank for Reconstruction and Development
EIA : Environmental Impact Assessment
ESMS : Environmental and Social Management System
GRM : Grievance Mechanism
HR : Human Resources
IFC : International Finance Corporation
IMS : Integrated Management System
KPI : Key Performance Indicator
MoEU : Ministry of Environment and Urbanization
OHS : Occupational Health and Safety
PR(s) : Performance Requirement(s)
SIP : Supplementary Information Package
1 INTRODUCTION

TÜMAD Madencilik San. ve Tic. A.Ş. (TÜMAD) plans to establish the Lapseki Gold and Silver Mine and Processing Plant Project (the Lapseki Project) within the administrative boundaries of the Şahinli and Kocabaşlar Villages of the Lapseki District in the Province of Çanakkale. The construction phase of the Lapseki Project has been at completion stage and the operation phase will start in October, 2017.

The project is seeking finance and this document is produced as a part of studies conducted to assess the Environmental and Social Impacts of the Project as per the EBRD Performance Requirements (PRs).

TÜMAD prepared this Stakeholder Engagement Management Plan (SEP) for Lapseki Mine operations in line with EBRD PR 10 requirements and it is based on an evaluation of the stakeholder engagement programme to date. The SEP identifies target groups and the specific range of engagement activities required for each group during the operations phase.

This Management Plan is based on the Project Environmental & Social Management System (ESMS) Framework (TMD_EYS_PLN.004) of TÜMAD, which is owned by the TÜMAD General Manager. Any subsequent changes to the TÜMAD ESMS may result in the changes to this document.

This Management Plan will be reviewed at a minimum on an annual basis to ensure that it remains valid and meets the needs of TÜMAD, local communities and other relevant stakeholders as identified in this SEP and to determine whether any changes or updates are required to the Management Framework unless a more frequent update is required to reflect changing project design or ESMS requirements and 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 Procedure (TMD_EYS_PRD.006).

2 PROJECT CONTEXT

2.1 Project Description:

Lapseki Gold and Silver Mine and Processing Plant Project has been planned to be within the borders of Çanakkale Province, Lapseki District, Şahinli and Kocabaşlar villages by TÜMAD. TÜMAD, which is a company owned by 100 percent Turkish capital, belong to Nurol group of companies comprising of more than 40 subsidiaries and affiliations that are active in various economic sectors.

The Turkish Mining Exploration and Research Directorate started mineral exploration activities in the region in the early 90s. In 1998 TÜPRAG also commenced separate exploration activities. Later, Chesser Resources engaged in the area. Chasser Resources was renamed as Batı Anadolu Madencilik (Western Anatolia Mining Co) in 2012 and in the year 2015 TÜMAD bought Batı Anadolu Madencilik (Western Anatolia Mining Co).

Within the scope of the project, it has been planned to extract gold and silver ores from 4 separate mines by applying open-pit mining methods. Ores extracted from mines shall be processed by applying tank leach process in order to produce dore gold-silver as final product. Gold will be processed using cyanide, and all transport, storage and handling will be undertaken in accordance with the International Cyanide Management Code, to which TÜMAD is a signatory.

The Project will have a short mine-life of approximately 10 years, after which a closure, decommissioning and after-care programme will be implemented to ensure the safety and stability of the mining area and to return as much land as possible to its former land-use.

The EIA (Environmental Impact Assessment Report) has been approved by the Ministry of Environment and Urbanization (MoEU) on 14 August 2015 and activities at the Project Site have started with mobilization and the construction of some office buildings.

Project layout and designs were revised-optimized with the NI-43-101 compliant Feasibility study (FS) completed in September 2016. Since the FS was completed after the approval of the EIA report, there are various differences between the two documents/designs. The consent of MoEU was acquired on the design revisions. MoEU has provided the consent of the validity of the EIA positive decision with these changes and did not require additional impact assessment studies with the letter dated 26 May 2017.

2.2 Social Area of Influence (AoI) of the Project

The Social AoI is defined as the villages and land between them, surrounding the Project Area (the EIA Permitted Area and infrastructure corridors the power line corridor, access road corridor and water pipeline corridor).
Lapseki Gold and Silver Mine is located at Çanakkale province in Aegean region. Project site is 35 km far from Çanakkale city centre and 7 km far from Lapseki district centre.

The electricity demand of the Project Site will be supplied from the 154 kV 1272 MCM Koru WPP Transformer Station via a transmission lines to the TÜMAD Lapseki Transformer Station located at the Site. A connection agreement has been signed between TÜMAD and TEİAŞ in January 2016 to establish the overhead transmission lines (OTL) to transmit electricity between the 154 kV 1272 MCM Koru WPP Transformer Station and the TÜMAD Lapseki Transformer Station as stated in the Environmental Impact Assessment. The construction of this OTL has been completed and the OTL is in operation as of September 2017.

The roads to be used within the scope of Lapseki Project are the access roads to the mine site and the service roads within the mine site. The access to the mine site will be through E-90 Çanakkale highway to Lapseki district centre, and then through Şahinli village road to get to the mine site. No new access road will be constructed.

The service roads are to be used for transport between the main access road, pit, the tailings, the dumping site, the ore preparation and enrichment plants.

TÜMAD signed a water supply agreement with the Lapseki Municipality in 2016. The process water requirements of the project will be supplied from the sources of the Lapseki Municipality through a water pipeline of 10.12 km, the construction of which has already been completed.

![Project Location](image)

**Figure 1: Project Location**

3 PURPOSE

Objective of this document is to identify all stakeholders and their interest in the project, determine at what stage and lay out procedures and principles to be applied during engagement with the stakeholders of TÜMAD Lapseki Gold and Silver Mine.

The purpose of this Plan is to:

- Identify all stakeholders and their interest in the project
- Define the scope of the Plan and set out applicable management interfaces;
- Define roles and responsibilities;
- Outline the applicable Project Standards relevant to this Plan;
• Define Project commitments, operational procedures relevant to this Management Plan;
• Define monitoring and reporting procedures, including Key Performance Indicators;
• Define training requirements.

Targets of the plan:
• To define project affected settlements/stakeholders of Çanakkale Lapseki Gold and Silver Mine;
• To describe the most effective methods, depending on degrees of effects, for keeping the management of operation fully informed on the issues related to external affairs and concerns;
• To develop the most effective methods and means in order for understanding the concerns of stakeholders and to establish fair, transparent and clear dialog with them on the basis of their concerns;
• To make an evaluation over engagement with stakeholders by means of monitoring and evaluation;
• To provide a communication and an action plan for proper engagement of stakeholders on the basis of mutual respect and confidence and win-win principle;
• To establish an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed in order for comprehending stakeholders problems and concerns;
• To establish long term relations between TÜMAD and local communities on the basis of mutual trust and transparency;
• To make sure that stakeholders have access to information on the project, investment, construction works and operation activities on a timely manner;
• To make sure that information and data being disclosed are fully understandable for targeted group, and that everybody has access to consultation areas and places;
• To make sure that disadvantageous groups have been identified and these groups have been included in ongoing consultation and engagement processes;
• To ensure all relevant parties have been engaged and no group have been excluded.

4 SCOPE
This plan embraces all activities of those including TÜMAD Mining, including associated facilities and all Contractors both during construction and operation phases of the mine. Contractors shall work in compliance with related requirements, standards been set in this Plan. This Management Plan is part of the overall suite of Management Plans developed for the TÜMAD Lapseki Project and Overlaps with other Management Plans:

4.1 Overlaps with Other Management Plans
• Livelihood Restoration Framework (TMD_EYS_PLN.008)
• Community Development Framework (TMD_EYS_PLN.007)
• Community Health, Safety and Security Plan (TMD_EYS_PLN.006)
• Labour Management Plan (TMD_IK_PLN.002)
• Local Procurement Management plan (TMD_EYS_PLN.005)
• Cultural Heritage Management plan (TMD_KTİ_PRD.004)
• Contractor Management Plan (TMD_ISG_PLN.003)
• Conceptual Mine Closure Framework (TMD_CEV_PLN.001)
• Framework Biodiversity Action Plan Appendix B of the Critical Habitat Assessment
• Biodiversity Offsets Strategy (TMD_CEV_PLN.012)
• Traffic Management Plan (TMD_ISG_PLN.005)
To be prepared
Cumulative Impacts Management Plan
  • Communications Strategy for national and international CSOs and Media
Community Development Management Plan
  • Livelihoods Restoration Management Plan

5 PROJECT STANDARDS
All activities and implementations, within the scope of projects and operations, of TÜMAD shall comply with relevant standards. These are as follow:
  • Applicable Turkish Legislation
  • Requirements by the Ministry of Environment and Urbanization
  • International Standards (ISO9001, ISO14001, OHSAS18001, ISO31000, EBRD PR10, IFC PS1 and others)
  • Commitments made to and requirements of, in accordance with relevant laws and regulations, relevant subsidiaries and institutions of Ministries of Turkish Republic
  • All policies, standards, directives, plans, lists and standard operation procedures of TÜMAD and Integrated Management Systems
  • ICMC International Cyanide Management Code

5.1 Applicable Turkish National Standards

I. THE CONSTITUTION OF THE REPUBLIC OF TURKEY
“The Constitution of the Republic of Turkey” is the main document related to the stakeholder engagement component of the project. The articles of the Constitution related to engagement issues are listed below:

VII. Freedom of Thought and Opinion
ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.

VIII. Freedom of Expression and Dissemination of Thought
ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

VIII. Health, the Environment and Housing
A. Health Services and Conservation of the Environment
ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution.

XI. Conservation of Historical, Cultural and Natural Wealth
ARTICLE 63. The state shall ensure the conservation of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.

VII. Right of Petition
ARTICLE 74. Citizens and foreigners resident considering the principle of reciprocity have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to the requests and complaints concerning themselves or the public.

II. CIVIL LAW
Real property rights and restrictions are defined under relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.
III. LAW ON THE RIGHT TO INFORMATION

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has right to information on the activities of the public institutions and the professional organisations, which qualify as public institutions.

IV. LAW ON THE USE OF RIGHT TO PETITION

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities with regard to the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreigners resident have this right considering the principle of reciprocity and drawing up petitions in Turkish.

V. EXPROPRIATION LAW

The other law related to involvement of stakeholders to the Project include the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is done in line with the Expropriation Law No 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorization, procedure, reason and subject of the action.

VI. ENVIRONMENTAL LAW

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No.2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to Environmental Law, citizens as well as the State bear responsibility for the protection of environment based on the “polluter pays” and “user pays” principles. The Law is supported by numerous Regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment (EIA) (25.11.2014, OG No. 29186 amended 09.02.2016, 26.05.2017).

The projects requiring an Environmental Impact Assessment Report, the EIA process and other relevant principles and procedures are detailed in the Environmental Impact Assessment Regulation. The first Turkish EIA Regulation was put into force in 1993 and it was amended in 1997, 2002 and 2003, 2008 and finally last EIA Regulation came into force on November 25, 2014 and lastly amended 26.05.2017.

5.2 **Turkish EIA Requirements**

In accordance with Turkish Republic Ministry of Environment and Urbanization Environmental Impact Assessment (EIA) Regulation (Official Gazette Nov. 25, 2014; No: 29186), relevant requirements in relation with EIA Process have been disclosed to the public.

5.3 **Applicable International Standards and Guidelines**

International standards to be observed by TÜMAD are ISO9001, ISO14001, OHSAS18001, ISO31000 and other similar ones. In relation with stakeholder engagement, EBRD Performance requirement 10, IFC: Performance Standard 1 shall be complied with.

Basic objectives are as follow:

- To define peoples and communities and other relevant parties having effect on, and having been effected from, and potentially to be affected by the projects and operations of, and to develop an appropriate procedure to certify them and to implement it.

- To prepare a database comprising of relevant stakeholder of the projects and operations of TÜMAD and to continuously update it.

- To comprehensively review this database by TÜMAD in consultation with relevant parties.

- To provide necessary information and consultancy services to the stakeholders in order to facilitate their required contributions on environmental and social issues that may have impact on them.

- To make significant contributions during implementation and operation phases of the projects of TÜMAD, and to continuously protect respectful and constructive relations with stakeholders on the basis of mutual confidence and honesty, and by respecting values of the stakeholders.

Basic requirements are as follow:
- Description of stakeholders,
- Preparation of a Stakeholder Engagement Plan,
- Provision of necessary information about the project and operation to the communities that have been affected or potentially to be affected,
- Provision of significant consultancy services by means of early and continuous engagement,
- TÜMAD Lapseki Project is a Category A project. Requirements in relation with these projects and operations shall be disclosed through formal evaluation process comprising of provision of necessary information in transparent, correct and open manner, and engagement of stakeholders,
- Participating to external reporting procedures during implementation and operation phases of the projects,
- A grievance and feedback mechanism aiming at concerns, discontents, requests and demands of the stakeholders, in relation with projects and operations of TÜMAD, being learned and handled on timely manner.

EBRD Requirement

The key requirements related to stakeholder engagement from EBRD PR10 are summarized below;
- Evidence that stakeholder engagement has been free of manipulation, interference, coercion and intimidation and the engagement was exercised based on timely, relevant, understandable and accessible information
- Stakeholders are individuals or groups who are affected or likely to be affected by the Lapseki project (affected-parties) or may have an interest (other interested-parties)
- Disclosure of environmental and social action plans or mitigation measures
- Documentation of the community consultation process
- Provision of EIA documents in the public domain and
- Grievance available and will not cause retribution

5.4 Applicable TÜMAD Standards, Policies and Procedures

Policies, standards, instructions, plans, lists and standard operation procedures of TÜMAD and Integrated Management Systems

This Management Plan has overlaps and cross-linkages to a number of other Management Plans which have community and stakeholder engagement implications and/or requirements as listed in Section 3.

Other key procedures referred in this Plan or are part of the implementation requirements of this Plan are described below;

Procedure for Engagement and Relations with Stakeholders (TMD_EYS_PRD.003)

This procedure describes the process for preparation and continuously update of a database comprising of stakeholders, and periodical and comprehensive review and update of the database by consulting with stakeholders.

TÜMAD Procedure for Grievance and Feedback (TMD_KTİ_PRD.001)

The purpose of this procedure is to define a transparent and comprehensive procedure to be implemented, on all exploration and operation areas and project sites of TÜMAD, for collecting, recording, reporting, monitoring and evaluating any kind of complaint, demand and feedback of local communities or relevant parties, project stakeholders in relation with environmental, occupational and safety, social or economic issues, commitments, and for resolving them through corrective and preventive measures.

This procedure shall be disclosed to all stakeholders.

Procedure for Local Employment and Procurement (TMD_KTİ_PRD.002)

The purpose of this procedure is to ensure compliance with TÜMAD local employment and procurement commitments. Local employment requirements for operations and projects shall be met from local communities, fairly and justly without discriminating against any group, as long as candidates for such employment positions available in that community have necessary qualifications for those positions or will have such qualifications after taking necessary training.

Procedure for Management of Sites Having Cultural Importance for Local Community (TMD_KTİ_PRD.003)
The purpose of the procedure is to the protection of sites having cultural importance for local community in areas affected by the Project.

**Procedure for Internal Communication and Consultation (TMD_EYS_PRD.005)**

The purpose is to ensure effective communication and consultation with the TÜMAD and contractor workers on Occupational Health and Safety, Environment and Community Relations issues, Labour Working conditions, Labour Rights.

**Procedure for Relations with Government**

It defines the requirements for creating an effective engagement with governmental institutions and organization that are included in the Project Stakeholders.

**Procedure for Relations with Media (TMD_KTİ_PRD.002)**

The purpose is to attract effective and positive interest of printed, visual and social media and to ensure that there is a transparent communication with local and national media on the projects and operations of TÜMAD.

**International Cyanide Management Code**

TÜMAD shall carry out its all design, construction, operation and closure works and activities in accordance with terms and principles of *International Cyanide Management Code in relation with Cyanide Production, Transportation and Usage for Gold Extraction* and shall stay in application standards.

### 6 ROLES AND RESPONSIBILITIES

The TÜMAD Executive Committee (Board) approved this Management Plan on September 2017. The roles and responsibilities in relation to the implementation of this plan are presented in the following table.
Table 1: Roles and Responsibilities

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<tr>
<td>General Manager</td>
<td>• Approval of this Plan and provision of resources required for implementation.</td>
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<tr>
<td>Lapseki Mine Operations Manager</td>
<td>• Responsible for employing required number of personnel and resources required for the implementation of this Plan.</td>
</tr>
<tr>
<td>TÜMAD Integrated Management System and Sustainability Manager</td>
<td>• Ensuring Project compliance with the Project Standards and other requirements set out in this Plan;</td>
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<td></td>
<td>• Overall responsibility for successful delivery of this plan;</td>
</tr>
<tr>
<td></td>
<td>• Overall responsibility in ensuring consistency in both mines;</td>
</tr>
<tr>
<td></td>
<td>• Developing, Monitoring and Revision of the Plan;</td>
</tr>
<tr>
<td></td>
<td>• Development, monitoring and revision of the plan as required.</td>
</tr>
<tr>
<td>Head of Community Relations Department</td>
<td>• Implementation of this plan including coordination with TÜMAD personnel and other stakeholders.</td>
</tr>
<tr>
<td>Head of Corporate Communications Department (part of the IMS and sustainability team)</td>
<td>• Coordinating media relations to ensure transparent communication with local and national press and other media institutions through appropriate means as such press statements, meetings.</td>
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<td>• Preparation of annual communication strategy.</td>
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7 STAKEHOLDER IDENTIFICATION

Activities of engagement with relevant parties and stakeholders and introduction of the Çanakkale- Lapseki project to the local community was started, in 2009, by Batı Anadolu Madencilik Company, from which TÜMAD has taken over the licenses, at the time when geophysical surveys, surface samples collecting works and drilling works were performed. These works have gained pace and momentum after the project was taken over by TÜMAD in 2014. TÜMAD initiated a comprehensive process for identification and engagement of stakeholders, as a part of socio-economic, cultural and basic data collection work, within the social project area.

7.1 Methodology

Relevant parties and stakeholders have been described according to their relations with the project features, potential degree of effect and their relevant interests in association with the project, their expectations and concerns including governmental authorities and other public or private organizations.

7.2 Stakeholder Categorisation

TÜMAD defines communities and stakeholders as two distinct groups:

- The term community is generally applied to the inhabitants of immediate and surrounding areas that may be affected in some way by a company’s activities; these effects may be economic and social as well as environmental in nature. Stakeholders are those who have an interest in a particular decision, either as individuals or representatives of a group including people who influence a decision or can influence it, as well as those affected by it.
- Other Stakeholders include non-governmental organisations, governments, shareholders and employees as well as non-affected community members.

The categories of stakeholder are presented below. **If you are not on the list below and would like to be kept informed about the project, please contact TÜMAD through the contact details provided at the end of this SEP below:**

1. **Communities:**
   - Settlements around and within Çanakkale Lapseki Gold Mine operation;
     - Şahinli,
STAKEHOLDER ENGAGEMENT PLAN for Lapseki Project

- Kocabaşlar,
- Yenice,
- Subaşı
- Çamyurt Village
- Mukhtar Offices
- Lapseki Municipality

- Society comprising of local people, local villagers and farmers who would be addressed through Livelihood Restoration Framework and Plan in addition to the Stakeholder Engagement Plan.
  - The people being effected from project activities and requiring special attention
    - Land owners and users having land in the Project Area, along power line and access road,
    - Owners of lands leased by contractors in order to construct storage, mechanical workshops, residential and social buildings for workers,
    - House, plot and land owners and/ or user who might be negatively affected from open pit mining and operation activities such as dust, noise, vibration and traffic.

2. Other Stakeholders:
   a. State agencies and relevant authorities
      i. Local State agencies and relevant authorities
         - Canakkale Governorships
         - Mayors
         - Offices of chief public prosecutors
         - Provincial gendarmerie commands
         - Provincial security directorates
         - General secretaries for provincial special administrations
         - Speakers’ offices for provincial assemblies
         - Provincial managements of employment agencies
         - Provincial managements of social security institutions
         - Environment and urbanization provincial managements
         - Canakkale Operational Unit of Uludağ EDAŞ
         - TEİAŞ Operation Maintenance Units
         - Food Agriculture Husbandry provincial managements
         - Provincial coordinator ships of Agriculture and Rural Development Support Institution
         - Provincial Finance Offices
         - Provincial directorate for National Education
         - Provincial Directorates of Health
         - Board of Directorates of Chamber Commerce and Industry
         - Provincial offices of Union of Chambers of Turkish Architects and Engineers
         - Representative offices of national gazettes and TVs
         - Canakkale regional directorates of forestry
         - DSİ 25th Regional Management and DSİ 252th Branch Management
i. Stakeholder Engagement Plan for Lapseki Project

- Lapseki Municipality
- Other neighbouring Municipalities
- Forest sub-district directorates
- District health directorates
- Heads of emergency services, police, fire station, health and gendarmerie

ii. National State agencies and relevant authorities

- Members of the parliament (TBMM)
- Ministry of Forestry and Water Management
- Ministry of Energy and Natural Resources/ General Directorate of Mining Affairs
- Ministry of Food, Agriculture and Husbandry
- Ministry of Environment and Urbanization
- Ministry of Interior
- Ministry of Culture and Tourism
- Ministry of Industry and Commerce

b. Other Institutions

- Çanakkale 18 Mart University
- Industrial institutions and organizations
- Gold Mine Association
- Unions
- Political parties
- Directorates for Chambers of Farmers, Merchants and Craftsmen
- Civil departments and courts
- Chamber of Agricultural Engineers-Çanakkale Branch

c. Non-governmental Organizations (NGOs) and Civil Society Organisations (CSOs)

- TEMA Branch office
- ÇASIAD Branch office
- TÜSİAD Branch office
- Union of Fruit Growers
- Şahinli Village Agricultural Development Union
- Güney Marmara Çevre Derneği (GÜMDER)
- Kazdağları ve Madra Belediyeler Birliği
- Çanakkale Çevre Platformu,

d. Media and Press

e. TÜMAD employees, TÜMAD contractors
3. Vulnerable People

In the context of this Stakeholder Engagement Plan, vulnerable groups refer to those who by virtue of particular characteristics (ethnicity, age, disability, gender identity, economic disadvantage etc.) may be more adversely affected by project impacts and more limited in their ability to claim or take part in project benefits.

Vulnerability is context specific and the nature and extent of vulnerability will differ according to area and project.

For the purpose of this project, vulnerable groups are defined as the following: female headed households, disabled persons, and those who are not under coverage of social security, and illiterate people, and very poor people, and rural area dwellers not having safe access to land.

It will be ensured that these people are given full opportunity to be informed of and to inform the project. Engagement activities will be designed to enable full participation of these groups.

8 STAKEHOLDER ENGAGEMENT TO DATE

8.1 Early Engagement

Stakeholder engagement activities started in the year of 2009 by Chesser Resources which is License holder, then the licenses were taken over by TÜMAD (2014). And, the works gained momentum after the licenses were taken over, and continued increasingly up to today. The photographs taken during the engagement activities and other relevant visual material are presented in Appendix 3.

During this period, TÜMAD has engaged with stakeholders in order to present the Project, collect opinions and views of stakeholder on the Project, respond complaints and grievances and where possible to provide solutions to raised complaints and to understand expectations of stakeholders.

Stakeholder meetings that have been materialized in the direction of stated principles and targets:

- 36 introductory meetings,
- 141 regular stakeholder meetings,
- 123 regularly held local community meetings, 3 of which are public briefing meetings,
- 58 meetings and interviews with relevant organizations, people and groups over water resources, water problems and result of analysis of collected water samples.
- 6 interviews local employment and workers,
- 62 meetings and interviews over environment and social responsibility projects, and moral and material support to the area,
- Briefing meetings with state agencies and authorities, 4 meetings with governorship, 3 meeting with local representatives of political parties, 2 with members of provincial assembly, and 11 with Special Provincial Administration,
- Eid visits to various groups and organizations including villagers at Lapseki villages, veterinary, craftsmen, gendarmerie command, Special Regional Authority, Directorate of Health, etc.
- 53 meetings with Lapseki villages
- Visits to village schools, tours and banquets have been held.

8.2 Engagement with Authorities during Permitting Process

TÜMAD has engaged with the Public Authorities during Permitting Process. The following table summarises this particular engagement activities.

<table>
<thead>
<tr>
<th>Authority</th>
<th>Date</th>
<th>Subject</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ministry of Environment and Urbanisation Waste Management Directorate</td>
<td>15.05.2015</td>
<td>EIA Requirements</td>
</tr>
<tr>
<td>Mine Technical Investigation Authority (MTA)</td>
<td>14.05.2015</td>
<td>Seismicity</td>
</tr>
</tbody>
</table>
8.3 Public Consultation Meetings under Ministry of Environment and Urbanization, EIA Regulation

In accordance with Turkish environment legislation, Public Consultation Meetings have been held together with public institutions in order to give information on the Project, and to collect opinions and suggestions of the people.

As part of the EIA studies a total 16 individual interviews (6 in Şahinli village, 5 in Kocabaşlar village and 5 in Çamyurt village) have been held with community members.

The EIA meeting held in Şahinli in 2014 was protested by the Çanakkale Environment Platform. One of the major concerns of the villagers as outspoken during this incident was the use of cyanide for the mining activities.

TÜMAD has developed a Cyanide Management Plan aligned with Cyanide Management Code will provide details of this Plan during the disclosure period and stakeholder engagement activities.

8.4 Other Engagements after EIA permit

A group of NGOs/CSOs represented by a Municipality Unions, Çanakkale Environmental Platform, the Bar had raised a case in civil court on the cancellation of the EIA positive decision in relation to the unavoidable environmental impacts of the Project on water sources and other components of the environment.

During the process the court has assigned discipline experts including academicians.

Not only to respond to the court process but also as an acknowledgement of the concerns of these NGOs/CSOs TÜMAD has presented the Project details and production process at site and on Project drawings to these experts, the

representative of suitors (Municipality Unions, Çanakkale Environmental Platform, the Bar), Representative of the Court at the date and time defined by the Courts.

Considering the concerns of the suitors and also referring to the outspoken concerns of the community members during the public consultation on use of cyanide TÜMAD has presented the details of the production process with additional studies during this meeting.

These additional studies are:

- INCO SO2/Air Chemical Treatment Process: Evaluation studies by academic experts on this process, examples of use in international projects, performance data, process chemistry
- Use of Cyanide on Gold Mines
- Environmental and Social Management System Documentation
- Examples of expert reports on other mines prepared by Academic Institutions in Turkey
- Report of TUBITAK (The Scientific and Technological Research Council of Turkey) on use of cyanide in mines at other countries
- Toxicological risk assessment of Cyanide (prepared by President of World Toxicology Association and academic institutions)
- The court’s final decision was to reject the case raised by the NGOs/CSOs.

TÜMAD will continue the engagement with the suitors and the other concerned NGOs/CSOs through various activities summarised in this stakeholder engagement plan (SEP) and acknowledge their concerns on the Project environmental and social risks and develop the responsive actions in the form of engineering and management controls and provision of technical information in relation to their concerns.

8.5 Engagement in relation with socio-economic baseline data collection during the preparation of SIA

For the preparation Social Impact Assessment socio-economic surveys baseline data collection activities have been performed in April – May, 2017. These are:

- Household investigations at Şahinli and Kocabaşlar villages, which are closest settlements to the Çanakkale-Lapseki mine site,
- Focus Group Meetings (focus group meeting with young men, focus group meeting with young men women, focus group meeting with young men elderly people) in Şahinli Village.
- Village headmen (Mukhtar) Meetings

Some of the major findings of the Community based stakeholder engagement activities are;

**Concerns on Cyanide Use**

The focus group interviews at the villages (Şahinli and Kocabaşlar) showed that the perception of community members on the cyanide is mixed. Some of the participants have concerns with regards to cyanide use and its potential impacts on both the environment and community health, while others think that the Company has taken the necessary precautions in this regard and will not mix any harmful waste with the soil and/or water. TÜMAD will continue to engage with these villagers and provide comprehensive information on the use of cyanide at the project and the measures in place to prevent any impact on the environment and community health.

**Grievance Mechanism**

One of the other outcomes of the social impact assessment study is the fact the members of the villages are not aware of the details of the grievance mechanism. TÜMAD has included the provision of information to the villagers on the grievance mechanism in to the stakeholder engagement programme.

**Road Safety**

Communities raised concerns on the traffic increase and the potential impact of the increased traffic especially on the children. TÜMAD will implement road safety training programme targeting the settlements along the access roads. TÜMAD will inform the community members on the traffic routes and traffic increases induced by the Project during the engagement meeting. The details of the developed Traffic Management Plan will be disclosed to the public through SIP disclosure process and stakeholder engagement activities.
Recruitment and Local employment

Communities stated their expectations on the transparent employment by TÜMAD. With that respect TÜMAD has defined the local employment targets and labour management plan and will share these details during disclosure process.

TÜMAD has a commitment to consider all the concerns during early consultations and during various other consultation meetings held in the SIA process and addressed concerns in the project mitigation measures (engineering and management controls). The details of these measures will be shared with all stakeholders during the disclosure process (as detailed in the following sections of the Plan).

8.6 Social Responsibility Projects Implemented by TÜMAD

Community engagement activities were also held in relation to a number of social responsibility projects including amongst others the construction of water pipelines, Şahinli Village Wedding Hall and a village transportation company.

8.6.1 Construction of Water Pipelines

TÜMAD completed construction of 22.48 km Şahinli water distribution pipeline which provide water from the Dumanlı Village. The Şahinli pipeline has gravitational flow and is considered as an alternative water source for the Şahinli village.

TÜMAD will use the water from Lapseki wells for process water supply and to provide water to Şahinli and Kocabaşlar Villages to meet the village water requirements. In this context, 10.12 km Lapseki pipeline including two parallel water distribution pipelines (one of them is main line and the other is spare) have been constructed from the Lapseki district network to the Şahinli village within the framework of the protocol made with the Lapseki Municipality.

All workmanship required for these projects has been purchased from the villagers in accordance with the terms of Procedure for Local procurement, and necessary payments have been made directly to those being employed.

8.6.2 Construction of Şahinli Village Wedding Hall

TÜMAD purchased a building from Mehmet Çetin, who is a resident of the village, and donated to village legal entity. Thereafter, building was designed and built as a wedding hall.

8.6.3 Kocabaşlar Village Water Exploration Works

Water exploration works over 6 water springs located at Kızılağaç area and flow-rate measurements have been carried out by TÜMAD. Route for water pipeline has been determined together with Special Provincial Administration, and cost estimate of the project has been made, and a contract for construction of the pipeline has been awarded. Official construction process shall be initiated by Kocabaşlar village mukhtar ship in the near future. Project cost will be paid by TÜMAD.

8.6.4 Construction Machinery and Land Vehicle Grant to Lapseki Municipality

TÜMAD has granted one unit of rubber wheeled excavator and one unit of four-wheel drive land vehicle to Lapseki Municipality.

8.6.5 Incorporation of Şahinli Village Transportation Company

TÜMAD has endorsed the establishment of a transportation company at Şahinli village which has been incorporated by 60 shareholders. This company will be employed for TÜMAD transportation needs. As a support for local economy, all shuttling services and trucking needs of the mine operation will be procured from this company.

8.6.6 Other activities

- Water exploration works for the villages around the project site, and water supply works when required,
- Maintenance, repair and infrastructure works for buildings such as mosque, cemetery, café, fountain, imam house, primary school, and village house, cooperative storage building, toilets, etc. at nearby villages,
- Contributions for upgrading or maintaining village service buildings.
8.7 Summaries of the Issues Raised by Stakeholders

A list of issues has been raised during household interviews and various other stakeholder engagement activities. Main issues have been listed below as Frequently Asked Questions. TÜMAD developed responses for these Questions at all stages of engagement listed.

Table 3: Issues Raised by Stakeholders during Early Engagement

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Frequently Asked Questions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Communities</td>
<td>Will all living beings within an area of 50 km in diameter diminish because of cyanide to be used in mining activities? Does cyanide causes cancer?</td>
</tr>
<tr>
<td>Local Communities</td>
<td>Will cyanide have any impact over our living environment and our health by means of vaporization and rain? Will heavy metals become active and cause pollution? What are the potential impacts of cyanide and heavy metals over our lives and our livelihood?</td>
</tr>
<tr>
<td>Local Communities</td>
<td>What are the basic environmental precautions in order to protect water resources and agricultural products from dust and chemicals? Will dust and chemicals have any impact over our livelihood vegetables, fruits, and other crops?</td>
</tr>
<tr>
<td>Local Communities</td>
<td>Will our residential areas be damaged because of blasts in mining activities? Will our villages need to be moved somewhere else? Will cyanide be transported to Greek Islands via Çanakkale, Aegean Sea, and pollute the sea?</td>
</tr>
<tr>
<td>Local Communities</td>
<td>What are the basic measurements for protecting our new water supply replacing our water sources within the borders of mine site? Will water sources be enough? Is it possible to have water shortage during summer seasons?</td>
</tr>
<tr>
<td>Relationship between Local Communities and Local Governments</td>
<td>What is the volume of water required for construction and operation of the mine? Will there be any change in water supply levels of existing settlements? Does the company make any contribution to the investments that might be required for alternative sources? Is there fire risk for forests near mine site? Will the company take any precaution for this risk?</td>
</tr>
<tr>
<td>Local Communities</td>
<td>Will village roads be used in order to Access to the mine sites? Are these roads sufficient to overcome potential traffic intensity? What is accident risk? And, what kinds of precautions are considered?</td>
</tr>
<tr>
<td>Relationship between Local Communities and Local Governments</td>
<td>What are potential contributions of the mine to the people in the area in terms of employment and commerce? What will be done for unskilled workers?</td>
</tr>
<tr>
<td>Local Communities</td>
<td>Are the tailing dams to be constructed for wastes strong enough? What happens in case any dam is damaged? How will waste piles be kept after the mine is closed?</td>
</tr>
<tr>
<td>NGOS/CSOs</td>
<td>Use of cyanide, impact on biodiversity, distance to Kaz Dağları National Park</td>
</tr>
</tbody>
</table>

8.8 Summary of Stakeholder Engagement Methods, Tools & Activities

TÜMAD has been employing various stakeholder engagement vehicles and methodologies for an effective stakeholder engagement. Table below shows which key methods and tools defined to engage with different stakeholder groups.
Table 4: Engagement Methods

<table>
<thead>
<tr>
<th>Stakeholder group</th>
<th>Key engagement and disclosure methods</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local communities</td>
<td>Posters, brochures, annual reports, contact group meetings, public meetings, cafe meetings, mine tours, women meetings, media, focus group meeting, surveys</td>
</tr>
<tr>
<td>Local villagers</td>
<td>Production, Administrative, Department meeting, notice boards, intranet, face to face interview, Toolbox conversations, Surveys, engagement of 3rd parties, Notice board, Intranet</td>
</tr>
<tr>
<td>Project workers/Contractors</td>
<td>Official meetings, particular meetings, focus groups, seminars, TÜMAD worksite visits, local informative materials</td>
</tr>
<tr>
<td>Local/Regional Authorities</td>
<td>Particular discussions, surveys, focus groups, seminars, supplier development programs</td>
</tr>
<tr>
<td>Local businesses</td>
<td>Working days, TÜMAD Information Office, thematic/issue focus meetings, focus group meetings and seminars, community development programs (as partners)</td>
</tr>
<tr>
<td>Local NGOs/CSOs</td>
<td>Regular community meetings, individual face to face meetings, Newspapers, radio, public meetings, web site, information brochures, complaint mechanism, Community Advisory Committee, through various project activities such as trainings, awareness raising campaigns, community development projects, and special tools targeting youth such as social media, sports and cultural events etc.</td>
</tr>
<tr>
<td>Community Members</td>
<td>Chambers of commerce meetings, industrial activities, particular meetings, supplier development programs</td>
</tr>
<tr>
<td>Business and Industry Unions</td>
<td>Worksite visits, particular meeting, web site, seminars, society development programs (as partners)</td>
</tr>
<tr>
<td>National/International Non-governmental organizations</td>
<td>Particular meetings, web site, seminars</td>
</tr>
<tr>
<td>Financial Institutions</td>
<td>Interviews, press meetings, press releases/ newspaper articles, web site, social media</td>
</tr>
</tbody>
</table>

9 STAKEHOLDER ENGAGEMENT PROGRAMME GOING FORWARD

Stakeholder engagement is an ongoing activity throughout planning, construction, operations and closure. The following tables summaries key planned stakeholder engagement activities during commissioning and operation phase.

TÜMAD has the overarching goal of developing sustainable relations with stakeholder through the life time of the project and therefore will continue to engage stakeholders through various activities as detailed in the following Stakeholder Engagement Programme.

The programme will be reviewed annually during operations, to ensure that it remains valid and meets the needs of TÜMAD, communities and other relevant stakeholders as identified in this SEP.
### Table 5: External Stakeholder Engagement during Commissioning and Operation Phases of Lapseki Mine

<table>
<thead>
<tr>
<th>Target Group</th>
<th>Topics of Interest in the Project</th>
<th>Purpose of Engagement</th>
<th>Engagement Vehicle/Meth ods</th>
<th>Schedule or Frequency during commissioning and operation</th>
<th>Responsible Person</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communities</td>
<td>Project Information on design, schedule, environmental and social impacts of the project commissioning and operation</td>
<td>Provision of information on</td>
<td>Posters, Brochures, Annual reports, Contact group meetings, Community meetings, Community Monitoring Committee meetings, Mine tours, Media, Open door activities</td>
<td>Daily, Weekly, Monthly, When required</td>
<td>Head of CR Department, Operation manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Objective and structure of investment and ongoing construction activities</td>
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<tr>
<td></td>
<td></td>
<td>• Production and environment technology selected, operational precautions taken</td>
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<tr>
<td></td>
<td></td>
<td>• Scheduling for commissioning activities and Potential impacts on health and safety measures/mechanisms Closure options, socio-economic and cultural impacts of rehabilitation and mine closure over local community,</td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td>• Precautions preventing damages over infrastructure and public and private properties (road, water, electric network, wall, fence, pole, etc.)</td>
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<tr>
<td></td>
<td></td>
<td>• Precautions against dust, noise, vibration</td>
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<td></td>
<td></td>
<td>• Blasting applications and conditions</td>
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</tr>
<tr>
<td>Communities</td>
<td>Recruitment and Procurement Strategies of Project</td>
<td>Provision of information on</td>
<td>Information leaflet (policies and strategies), Community Meetings, Media releases, Community Monitoring Committee meetings</td>
<td>Monthly, When Needed / When Requested</td>
<td>Project Team, CR Department, HR Department, Procurement</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Recruitment of employees</td>
<td></td>
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<td></td>
<td></td>
<td>• Training of staff</td>
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<tr>
<td></td>
<td></td>
<td>• Procurement of supplies and services</td>
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<td></td>
<td></td>
<td>• Design of Capacity development program for local people through targeted training programs internally and with key external training partners</td>
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</tr>
<tr>
<td>Target Group</td>
<td>Topics of Interest in the Project</td>
<td>Purpose of Engagement</td>
<td>Engagement Vehicle/Methods</td>
<td>Schedule or Frequency during commissioning and operation</td>
<td>Responsible Person</td>
</tr>
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<td>--------------------------------------------------------------------------------------------------</td>
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<td>------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------</td>
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</tr>
<tr>
<td>Communities</td>
<td>Procedures on how to submit comments to and raise grievances to Project</td>
<td>Provision of information on:</td>
<td></td>
<td>Monthly basis</td>
<td>CR Department</td>
</tr>
<tr>
<td></td>
<td>Procedures of the Project on responding community comments and grievances</td>
<td>• Training on Grievance Procedure</td>
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<td></td>
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<td>• Grievance Resolution Process (including in response to security, construction or</td>
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<td></td>
<td></td>
<td>mining contractor issues)</td>
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<td></td>
<td></td>
<td>• Provide training on Company policies (employees and contractors) on respectful and</td>
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<tr>
<td></td>
<td></td>
<td>appropriate behaviours with communities</td>
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<tr>
<td></td>
<td></td>
<td>• Periodic monitoring of contract implementation with communities.</td>
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<tr>
<td></td>
<td></td>
<td>• Grievance resolution and monitoring of agreed compensation measures</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pastoral Farmers</td>
<td>Livelihood impact</td>
<td>Provision of information on</td>
<td></td>
<td></td>
<td>CR Department</td>
</tr>
<tr>
<td>Livestock Owners grazing</td>
<td></td>
<td>• Livelihood Restoration Framework</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>animals</td>
<td></td>
<td>• Livelihood Restoration Plan</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>• Community Development Project</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>• Livelihood Restoration Close out Audit</td>
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</tbody>
</table>

|                |                                                                                                 |                                                                                         |                                                        |                                                        |                   |

Grievance register
Interviews
Suggestion boxes
Mails and calls
Community Meetings
Grievance mechanism
Community Monitoring Committee meetings

Community Meetings
Face to face Meetings
Community Monitoring Committee meetings
Grievance mechanism

Daily weekly
Monthly basis
When required
LRP close out audit -2 years after completion of the LRP activities

CR Department
<table>
<thead>
<tr>
<th>Target Group</th>
<th>Topics of Interest in the Project</th>
<th>Purpose of Engagement</th>
<th>Engagement Vehicle/Meth ods</th>
<th>Schedule or Frequency during commissioning and operation</th>
<th>Responsible Person</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communities &amp; local state agencies and relevant authorities and NGOs</td>
<td>The design, implementation and monitoring of community development Plan of the Project</td>
<td>Provision of information on community development by the Project</td>
<td>Workshops</td>
<td>daily weekly</td>
<td>CR Department</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Identification and prioritization of community needs</td>
<td>Survey</td>
<td>weekly</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Assessment of available and required resources</td>
<td>Community Meetings</td>
<td>monthly</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Formation of partnerships with government and community groups for development and implementation of sustainable community development projects in partnership with key stakeholders</td>
<td>Meetings with NGOs</td>
<td>and when required</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Promotion of positive interactions and promote social cohesion</td>
<td>Posters</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>between the workforce and Lapseki municipality citizens, (e.g. sport, recreation, worship, or other activities.)</td>
<td>Media</td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Community Monitoring Committee</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Communities &amp; NGOs, Local State agencies and relevant authorities (specifically, heads of emergency services, police, fire station, health and gendarmerie)</td>
<td>Use of cyanide in the Project Emergency preparedness of the Project</td>
<td>Provision of information on cyanide code compliance / emergency preparedness</td>
<td>Workshops</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Develop appropriate emergency response strategies and capabilities with potentially affected stakeholders</td>
<td>Joint drilling</td>
<td></td>
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<td></td>
<td></td>
<td>• Engage in public consultation and disclosure about issues of concern with potentially affected stakeholders</td>
<td>exercises</td>
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<td></td>
<td></td>
<td>• Ongoing stakeholder engagement with emergency response organisations (including the Turkish Crisis Brigade)</td>
<td>Community and local authority Meetings</td>
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<td></td>
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<td>Posters</td>
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<td>Target Group</td>
<td>Topics of Interest in the Project</td>
<td>Purpose of Engagement</td>
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<tr>
<td>Affected land users and land owners Canakkale Operational Unit of Uludağ EDAS TELAŞ Operation Maintenance Units Construction contractors Employees</td>
<td>Management of risks on the biodiversity components by the Project</td>
<td>Provision of information on biodiversity management</td>
</tr>
<tr>
<td>Group including Farmers and producers Land owners and users having land</td>
<td>Management of environmental and social risks by the Project Employment and Procurement Strategies of the Project</td>
<td>Provision of information on</td>
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<tr>
<td>Target Group</td>
<td>Topics of Interest in the Project</td>
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</table>
| along power line and Access road Owners of lands leased by contractors | • Transportation of hazardous chemicals and wastes  
• Waste piling and waste treatment facilities  
• Heavy vehicle traffic on public roads  
• Production stimulating activities in the area, projects and incentives related to storage and transportation of fruits and vegetables | Community Meetings  
Face to face meetings | | | |
| Non-governmental organizations (NGOs)              | Social progress, Economic and Social Development, Environmental Protection                     | **Provision of information on:**  
• Mitigation measures against potential environmental and social risks  
• Sustainability criteria  
• Social responsibility projects implementation principles  
• Description of social needs and determination of priorities  
• Assessment of existing and required resources  
• Establishment of new partnerships with government, social groups and key stakeholders in order for development and implantation of sustainable development projects.  
• Cumulative impacts of mines in the regions | Focus Group meetings with interest groups/NGOs  
Sponsorships  
Workshops  
Surveys  
Monthly public meetings  
Meetings with non-governmental organizations  
Regular E&S progress update reports through website  
Posters  
Media  
Sectoral fairs and conferences  
Activities through Gold Mine Association | When required/When demanded  
In social activities  
Regular meeting in every 6 months | Head of CR department |
<table>
<thead>
<tr>
<th>Target Group</th>
<th>Topics of Interest in the Project</th>
<th>Purpose of Engagement</th>
<th>Engagement Vehicle/Meth ods</th>
<th>Schedule or Frequency during commissioning and operation</th>
<th>Responsible Person</th>
</tr>
</thead>
</table>
| Municipalities and Mukhtar offices | Management of environmental risks of the Project | **Provision of information on;**  
- Environmental monitoring programme  
- Environmental monitoring results  
- Overall information about progress of the project  
- Support in reaching vulnerable groups. Cumulative impacts of mines in the regions | Planned Meetings, Brochures, Workshops | Monthly When required | Head of CR Department Operations Manager, General Manager |
| Municipalities and Mukhtar offices | Management of social risks of the Project | **Provision of information on**  
- Speculative migration of job seekers  
- Population dynamics  
- Employment Statistics  
- Procurement Statistics  
- Cumulative impacts of mines in the regions | Planned Meetings, Brochures, Workshops | Monthly When required | Head of CR Department Operations Manager, General Manager |
| Local and National State agencies and relevant authorities | Project activities and schedule Management of environmental and social risks by the Project | **Provision of information on**  
- Project activities and schedule  
- Management and monitoring plans for environment, health and social issues,  
- Closure alternatives and their effects on local communities  
- Establishment of new partnerships with government, social groups and key stakeholders for development and implantation of sustainable development projects  
- Cumulative impacts of mines in the regions | Meeting with governmental institutions | Minimum six monthly When required | CR Department IMS Mining rights and licenses |
| Emergency services, police, fire station, health and gendarmerie | Accident, Emergency, Compliance with Cyanide Code, Public Health | **Provision of information on**  
- Development of appropriate emergency action strategies and capacities together with stakeholders under risk,  
- Providing consultancy services to the public and knowledge sharing about accidental risks,  
- Continuous cooperation between emergency response agencies and stakeholders, | Meetings with state agencies and non-governmental organizations Posters Public meetings | Once every 3 months When required | CR Department OHS Department Environment Department |

**STAKEHOLDER ENGAGEMENT PLAN for LAPSEKİ PROJECT**

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<tr>
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<tr>
<td>Target Group</td>
<td>Topics of Interest in the Project</td>
<td>Purpose of Engagement</td>
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</tbody>
</table>
| Industrial institutions and organizations Gold Mine Association | Management of environmental and social impacts of the Project                                    | • Road safety awareness training, including safely passage side roads and access roads, activities targeting sensitive groups such as children.  
• Activities aiming at raising awareness of people about kinds, numbers and intensity of vehicles that would be on stage at different phases of the project.  
• Determination of opportunities for providing support to local health campaigns focusing on contagious and sexually transmissible diseases,  
• Training programs focusing on alcohol, personal and food hygiene, contagious diseases (including sexually transmissible ones, those related to sexual activities and reproduction) and noncontagious diseases, and on raising awareness for life style, and on minimizing risky behaviours, and on receiving medical assistance when required | Technological informing  
All quality standard compliance certification | Annually                                    | General Manager  
Operation Manager  
Head of CR Department |
| Unions                                           | Labour Working Conditions                                                                       | Provision of information on:  
• Coordination on management of cumulative impacts, to discuss sector standards, knowledge/experience sharing  
• Cumulative impacts of mines in the regions | Oversight meetings                                       | Every six months                                   | General Manager  
Deputy HR Manager |
| Media                                            | Project activities Management of environmental and social risks by the Project                   | Provision of information on;  
• Transparent communication connection and positive reaction of printed and visual media | Press conferences, Press releases, Media follow-up | When required                                    | CR Department Operations Manager  
General Manager |

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**STAKEHOLDER ENGAGEMENT PLAN for LAPSEKİ PROJECT**

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</table>
### Target Group: Vulnerable Groups

**Topics of Interest in the Project**
- Project activities
- Management of environmental and social risks by the Project
- Grievance mechanism
- Employment
- Any other interest of vulnerable groups

**Purpose of Engagement**
- Provision of information on:
  - Recruitment of employees
  - Training of staff
  - Procurement of supplies and services
  - Design of Capacity development program for local people through targeted training programs internally and with key external training partners
  - Use of roads, water and other infrastructure, increase in traffic density
  - Air, vibration, noise and dust emissions, visual impact
  - Use of roads, water and other infrastructure, increase in traffic density
  - Local employment
  - Important commercial opportunities
  - Air, vibration, noise and dust emissions, visual impact
  - Youth inclusion

**Engagement Vehicle/Meth ods**
- Planned meetings targeting vulnerable groups
- Women only meetings
- Workshops
- Individual and community meetings
- Focus group discussions
- Leaflets and information sheets

**Schedule or Frequency during commissioning and operation**
- Monthly
- When required

**Responsible Person**
- Head of CR Department
- Operations Manager
- General Manager

---

### Target Group: TÜMAD employees

**Topics of Interest in the Project**
- Employee welfare

**Purpose of Engagement**
- Provision of information on:
  - Employee Grievance Mechanism
  - Labour rights
  - OHS procedures

**Engagement Vehicle/Meth ods**
- Bulletin
- Face to face interview
- OHS Committee Trainings
- Company social events for employees
- Employee Grievance Mechanism

**Schedule or Frequency during commissioning and operation**
- Monthly
- When required
- With the grievance

**Responsible Person**
- Head of CR Department
- Deputy HR Manager
- Operation Manager
<table>
<thead>
<tr>
<th>Target Group</th>
<th>Topics of Interest in the Project</th>
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<th>Schedule or Frequency during commissioning and operation</th>
<th>Responsible Person</th>
</tr>
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<tbody>
<tr>
<td>TÜMAD contractor employees</td>
<td>Employee welfare</td>
<td>Provision of information on:</td>
<td>Bulletin face to face interview OHS Committee Labour audits/reviews</td>
<td>Monthly When required With the grievance</td>
<td>Deputy HR Manager Construction Managers</td>
</tr>
<tr>
<td></td>
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<td>• Employee Grievance Mechanism</td>
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<td>• Labour rights</td>
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<tr>
<td></td>
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<td>• OHS procedures</td>
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<td>• Contractor management</td>
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10 **TOOLS & METHODS FOR INFORMATION DISCLOSURE DURING OPERATIONS OF LAPSEKİ MINE**

TÜMAD will develop open, consistent information provision material that will be timely and available for local communities. Prior to any information provision activity, TÜMAD will prepare a pre-information provision plan that describe information sharing process in order to give opportunity to all main groups to get information on the project and to make comment on.

10.1 **Internet/Web Site**

TÜMAD will keep information on the Project updated on its website in Turkish and English.

10.2 **Information sheets**

Information sheets on key project issues and TÜMAD’s approaches to minimise, mitigate and manage, will be prepared and made available on the TÜMAD web site and at its Şahinli office. Their copies will be available at Şahinli and Kocabaşlar mukhtar offices and cafes as well.

10.3 **Responding to Local Communities and Publications for people**

As is indicated in the Procedure for Grievances and Feedback (TMD_KTİ_PRD.001), TÜMAD will immediately give full and timely responses to expectations, comments and questions of local communities as well as pursuing grievance procedure that would be implemented for certain problems and expectations. All expectations shall be treated respectfully, and people shall be convinced through explaining the reasons, and by referring to social plan if it is not possible to meet expectations of the people.

Both at community relations office and company web site, booklets, CDs, films, brochures, posters and similar material providing information about different stages of the project will be available, and stakeholders will be kept posted by company officials.

Time to time, particular matrices and informative documents will be prepared as a response to concerns, discontents and expectations of stakeholders and local communities on the basis of impact assessment surveys carried out by upper management of the company and meetings participated by them to ensure effective consultation. As long it is appropriate, relevant project information will be disclosed to the public.

10.4 **Public media**

Project information will be supplied to public media in a way it is considered appropriate such as interviews, press releases and similar. This will be especially done during commissioning and operation stages, and when any major change that may affect local communities and land users occurs in the project. These activities will be coordinated with Corporate Communications Department.

10.5 **Disclosure of the Supplementary Information Package (SIP) on environmental and social impacts and management plans for Lapseki mine operations**

In addition to the Environmental Impact Assessment prepared and approved in line with Turkish EIA Regulation, TÜMAD has produced a supplementary information package in accordance with EBRD Environmental and Social Policy and Requirements on Environment and social impacts and management plans for operation phase of the Lapseki Mine SIP and Environmental with Environmental and Social Management Plans will be disclosed to the Public prior to operation in 29th September 2017 for 60 days.

**This SIP will consist of the following key documents:**

1. The EIA study prepared and approved in line with Turkish EIA Legislation
2. Description of the Project Study Area and associated facilities
3. A summary of physical and biological impacts of the Project over the Project Study Area and associated facilities
4. Critical Habitat Assessment over the Project Study Area and associated facilities
5. Social Impact Assessment (SIA) over the Project Study Area and associated facilities
6. Hydrogeological Impact Assessment over the Project Study Area and associated facilities

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7. Non-technical summary of the Project (NTS)
8. Commitments Register of the Project
9. Environmental and Social Management Framework (ESMSF)
10. Environmental and Social Management Plans ad Frameworks including:
   - Air Quality Management Plan
   - Framework Biodiversity Action Plan
   - Biodiversity Offsets Strategy
   - Community Health and Safety Security Management Plan
   - Community Development Framework
   - Conceptual Mine Closure Framework
   - Contractor Management Plan
   - Cultural Heritage Management Plan
   - Cyanide Management Plan
   - Emergency Action Plan
   - Explosives and Hazardous Materials Management Plan
   - Labour Management Plan
   - Livelihood Restoration Framework (LRF)
   - Local Procurement Management Plan
   - This Stakeholder Engagement Plan (SEP)
   - Waste Management Plan
   - Water Resources Management Plan
   - Noise and Vibration Management Plan
   - Traffic Management Plan
   - Water Resources Management Plan
11. ESAP – which includes actions to structure the project in line with lender requirements and will form part of the loan agreements.

Disclosure and consultation of the SIP is beyond national legislative requirements and it will be undertaken to ensure that the affected parties and all other stakeholders are fully aware of the environmental and social impacts that may affect them and TÜMAD’s commitments towards minimising and managing such impacts. Disclosure and consultation also will allow other interested parties to see the SIP documentation and make comments on the content and receive feedback from TÜMAD in terms of comments received.

10.6 Disclosure Activities (October-November 2017)

Key activities during the SIP disclosure period includes the following:

A. Information Disclosure:

Supplementary Information Package (SIP) including the EIA, SIA and E&S Management Plans, Non-technical summary (NTS), ESMS Framework and ESAP will be made available at the websites of TUMAD and hard copies will be maintained at various locations for the review and comments of stakeholders for 60 days between 29th September – end November 2017. The full ESIA disclosure package can be found at the following addresses:

**TÜMAD Head Quarter in Ankara/Turkey:**
Address: TÜMAD Madencilik A.Ş. General Directorate, Buğday Sokak No: 9 Kavaklidere Çankaya ANKARA
Email: info@tumad.com.tr
Telephone: 0 312 455 16 10
Fax: 0 312 455 16 01

**TÜMAD office in Lapseki/Canakkale:**
Address: TÜMAD Madencilik A.Ş. Lapseki Altın Madeni İşletmesi Beyçayır Yolu 12.Km Lapseki / ÇANAKKALE
Email: info@tumad.com.tr
Telephone: 0312 505 00 06

**TÜMAD office in Ivrindi/Balıkesir:**
Address: İğdeburnu Mevkii Burhaniye Balıkesir
Email: info@tumad.com.tr
Telephone: 0312 505 00 06

**Nurol Holding/Istanbul:**
Address: Büyükdere Caddesi No:255 Kat: 19 Maslak /İSTANBUL
Email: info@tumad.com.tr
Telephone: +90 312 455 10 00
Fax: +90 312 455 10 60

**EBRD website:** In accordance with EBRD’s own information provision policy, project information and connection with TÜMAD web site will be provided. In addition EBRD will upload SIP documentation in English and Turkish to its own web site at [http://www.ebrd.com/esia/html](http://www.ebrd.com/esia/html).

Also hard copies of the full disclosure package will be available at:

- **EBRD Resident Office in Ankara** (Esängezir Yolu, Armada İş Merkezi, No:6 Kat:4, Söğütözü, 06520 Ankara)
- **at the office of the Ivrindi Governship** (Sakarya Mah. Atatürk Meydanı Hükümet Konağı İvrindi, Balıkesir)
- **at the office of the Ivrindi Municipality** (Bedrettin Mahallesı, Hükümet cad. No:68, 10770 İvrindi/Balıkesir)
- **at the office of the Balıkesir Governship** (Eski Kuyumcular Mah. Hükümet Cad. No:2 Kareşi / BALIKESİR)
- **at the office of the Lapseki Governship** (Cumhuriyet Mah. Zübeyde Hanım Caddesi No:13 Lapseki / ÇANAKKALE)
- **at the office of the Lapseki Municipality** (Gazi Süleymanpaşa Mah. Çanakkale Cad. No:32 Lapseki/ ÇANAKKALE)
- **at the office of the Lapseki Çanakkale Governship** (Cevatpaşa Mahallesı,, Kayserili Ahmet Paşa Caddesi, No:26, Hükümet Konağı, Çanakkale)

Electronic copies will be sent to the 18 Mart University in Çanakkale and Balıkesir University in as wel as key Governmental institutions including Ministry of Environment.

**B. Disclosure Meetings:**
TÜMAD will conduct disclosure meetings with the affected communities October and November 2017 at the below locations. There will also be women only disclosure meetings at these locations.

- Şahinli village,
- Kocabaşlar village
- Çamyurt village
- Lapseki District Center

Exact dates and venues of these meetings will be announced minimum one week prior to the meetings dates in order to ensure participation of the communities and other regional stakeholders to these meetings.

During this engagement phase, disclosure and consultation activities will be designed along the following general principles:

- Consultation events and opportunities must be widely and proactively publicised, especially among Project affected parties, at least 1 week prior to any meeting;
- The non-technical summary must be accessible prior to any event to ensure that people are informed of the assessment content and conclusions in advance of the meeting;
- The location and timing of any meeting will be designed to maximise accessibility to Project affected stakeholders;
- Information presented will be clear and non-technical, and will be presented in the local language understood by those in the communities;
- Facilitation will be provided to ensure that stakeholders are able to raise their concerns;
- Issues raised are answered at the meeting or actively followed up.

Information provision meetings will be open to all public and be announced at local media. And, they will be held at village mukhtar offices or village cafes depending on availability.

TÜMAD will inform the public, via newspapers, meetings, media and other similar means, about how people access to SIP documents and project time table, and how they can make comment over SIP.

TÜMAD welcomes comments and observations on the Supplementary Information Package (Environmental Social Impacts and Management Plans) for Operations phase of Lapseki Mine and will endeavour to provide responses to all queries and comments received during the 60-day Disclosure period. (October-November 2017)

You are welcomed to contact us through the contact details provided below.

11 MANAGEMENT OF GRIEVANCES

TÜMAD have an established external grievance mechanism which is available for every stakeholder to use. Any comments or concerns can be brought to our attention either verbally or in writing (by post or e-mail) or by filling in a grievance form (an example is include in Appendix 1) the grievance form will be made available in on the Project website (www.tumad.com.tr) alongside this description of the grievance mechanism. Grievance forms can then be submitted to the Company through contact details provided in Section Procedure for Grievance and Feedback.

TÜMAD has developed a detailed Grievance and Feedback Procedure (TMD_KTI_PRD.001) and provided information about it to the stakeholders. TÜMAD will continue to provide information about the grievance mechanism during the lifetime of the Project.

According to TÜMAD Grievance Procedure all grievances will be:

- Acknowledged within 3 days; and
- Responded to no later than 30 days.

Grievance information is recorded in a grievance log by specifically nominated and trained members of staff. TÜMAD logs the following information:
• Name and contact details,

Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out. Relevant parties and stakeholders are recommended to fill out the following grievance and request form (TMD_KTİ_FRM.001). These grievances and requests are responded in accordance with the Procedure.

The Grievance Forms are provided in Appendix 1, Flow chart of grievance mechanism presented in Appendix 2.

The stakeholders have been so far informed on the Grievance mechanism through the stakeholder engagement activities performed up to date as described in Section 8.

Stakeholders can raise their grievances directly during any stakeholder and consultation meeting and through the submission of the grievance form to the address above.

More specifically the owners and users of the lands that to be potentially effected and the vulnerable groups will be specifically informed through the stakeholder engagement activities (as detailed in Section 9) on:

• Procedure for grievance and feedback
• Training on grievances procedure
• Process for Grievance Solution (including security and responses to problems of construction or mining contractors)
• Accident grievance and expectation form,
• Suggestions and complaints boxes, letters and telephone conversations

11.1 Contact Details of TÜMAD Madencilik A.Ş.

In order to ask a question, to make a comment and to complaint, stakeholders may reach General Directorate and Operations’ Formal Communication departments by using following contact information.

<table>
<thead>
<tr>
<th>CONTACTS OF TÜMAD Madencilik A.Ş.</th>
</tr>
</thead>
<tbody>
<tr>
<td>TÜMAD Madencilik A.Ş. General Directorate:</td>
</tr>
<tr>
<td>Address: Buğday Sokak No:9 Kavaklıdere Çankaya ANKARA</td>
</tr>
<tr>
<td>Tel : 0 312 455 16 10</td>
</tr>
<tr>
<td>Fax: 0 312 455 16 01</td>
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</tbody>
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<thead>
<tr>
<th>TÜMAD Madencilik A.Ş. Lapseki Gold Mine Operation</th>
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</thead>
<tbody>
<tr>
<td>Address: Beyçayır Yolu 12.km No:210 Şahinli /Lapseki /ÇANAKKALE</td>
</tr>
<tr>
<td>Tel: 0312 505 00 06</td>
</tr>
<tr>
<td>e-mail: <a href="mailto:info@tumad.com.tr">info@tumad.com.tr</a></td>
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12 MONITORING

12.1 General Overview on Monitoring Requirements

Project standards and monitoring measures to be applied during construction and operation stages in order assess appropriateness are explained in Environmental and Social Management and Monitoring Plan.

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

TÜMAD is committed to creating a participatory monitoring mechanism to create a committee of local stakeholders to conduct in situ monitoring of mining activities during the operating period. The functioning of the board, membership structure, meeting frequency, how the secretariat will be executed, tasks, etc. will be further be clarified further with a specific analysis on the local expectations and local stakeholders. TÜMAD will share the regular Project monitoring reports on such as water quality, ambient environmental conditions, traffic incidents, cyanide consumption. TÜMAD will engage with this committee on the design and implementation of the community development projects.
12.2 Key Monitoring Activities

TÜMAD will monitor the implementation of the stakeholder engagement process. The outputs of this monitoring would also provide input on the management and monitoring of the overall environment and social performance of the project mainly through:

- Revision, improvement or extension of the monitoring activities, parameters, locations and frequency (dust, water, noise and similar)
- Review and revise the management plans and procedure.

TÜMAD will monitor the effectiveness of the engagement processes by analysing the feedback received from engagement activities thus involving the engaged stakeholders into the monitoring process.

Where appropriate, during all engagement activities, questions will be asked to stakeholders to on the effectiveness of the meeting and the process of stakeholder engagement. These questions will be tailored for the engaged stakeholder but would address mainly:

- Transparency of the engagement process
- Provision of relevant information
- Timely response on questions
- Clarity of the information provided
- Applicability and relevancy of the information provided

Table 6: Key Monitoring Activities

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<tr>
<th>No</th>
<th>Topic/Aspects</th>
<th>Methods</th>
<th>Responsible Parties</th>
<th>Frequency</th>
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</table>
| SEP-LAP-01 | Community Complaints          | TÜMAD will review Grievance Log/Database, including complaints closed and those unresolved per period (at a minimum monthly but more likely as they occur) to include:  
  - number of outstanding complaints and grievances opened in the month;  
  - number of complaints and grievances opened in the month and evolution since Project start (graphic presentation);  
  - number of complaints grievances closed in the month; and  
  - type of grievance.  

  The TÜMAD CR team will provide regular reporting back to the community on the treatment of community grievances (including the type of grievance, how they have been addressed and the outcomes arising). An annual audit will be conducted of the Grievance Procedure. The Mediation Committee will be used to facilitate the implementation and monitoring of the Grievance Procedure. | Head of CR Department | Monthly |
| SEP-LAP-02 | Visitors to TÜMAD Çanakkale office | Community Relations Officers record visitors to TÜMAD offices and report in Monthly Departmental performance report. Include visitor numbers, type of visitor, reason for visit etc. | Head of CR Department | Monthly |
| SEP-LAP-03 | Community engagement activities | Community Relations Officers record formal and informal engagement with local communities in Stakeholder Management System. This will include interactions with committees and working groups. Summarise in Monthly Department performance report. A stakeholder Engagement Tracker will be set up to record and track all engagement activities and actions from those engagements. The engagement activities will be reported | Head of CR Department | Monthly 6 monthly |
12.3 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>
<thead>
<tr>
<th>ID</th>
<th>KPI</th>
<th>Target</th>
<th>Monitoring Measure</th>
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<tbody>
<tr>
<td>SEP-LAP-KPI-01</td>
<td>Number of community complaints or grievances</td>
<td>Total number reduced year on year</td>
<td>Complaints Log/Database</td>
</tr>
<tr>
<td>SEP-LAP-KPI-02</td>
<td>Number complaints resolved within one month</td>
<td>Target of 100%</td>
<td>Complaints Log/Database</td>
</tr>
<tr>
<td>SEP-LAP-KPI-03</td>
<td>Reporting back to stakeholders on implementation of the Grievance Procedure</td>
<td>Delivery of regular reports to stakeholders on the outcomes of the Grievance Procedure</td>
<td>Reporting</td>
</tr>
<tr>
<td>SEP-LAP-KPI-04</td>
<td>Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.</td>
<td>Bi-annual audit complete Target of 100% of grievances closed out to satisfaction of complainant within one month</td>
<td>Audit report.</td>
</tr>
</tbody>
</table>

13 TRAINING

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

13.2 Induction Training
All employees of TÜMAD and contractors are required to participate in community relations and human rights training as part of the standard induction programme. This training is designed to help Turkish and foreign workers on the TÜMAD Project understand and respect different cultures and points of view and operate effectively as team members, as well as and behave appropriately when they are within local communities.

13.3 Job-Specific Training
Specific training on stakeholder engagement and the application of the Grievance Procedure will be provided to Community Relations Officers and other personnel and supervisors of TÜMAD and contractors involved in or overseeing activities with local communities.

13.4 Other Training Requirements
Additional specialist training shall be provided to key personnel involved in community and stakeholder engagement on an “as needed” basis.
14 AUDIT AND REPORTING

14.1 Internal Auditing

Conformance will be monitored in accordance with Auditing Procedure of TÜMAD. All incidents and non-conformances will be reported as per the requirements of the TÜMAD ESMS Management System as described in the ESMS Framework Document.

14.2 Contractor Auditing

Contractors will be subject to inspection and audit by TÜMAD prior to a contractor’s initial appointment and then on an annual basis as outlined in the Contractor Management Plan (TMD_IsG_PLN.003).

14.3 External Auditing

Conformance with this plan will be subject to periodic assessment by Nurol Group corporate audit and assurance programmes and separately by Project Lenders.

14.4 Record Keeping

The following records will be kept in accordance with TÜMAD procedures:

1. Consultation meetings
2. Stakeholder engagement activities
3. Raised grievances
4. Opinions/suggestions/comments provided by community members during consultation meetings and stakeholder engagement activities (to be recorded in the grievance mechanism)
5. Press releases and interviews
6. Records of audits, inspections and incidents.
# APPENDIX 1 - GRIEVANCE FORMS

## GRIEVANCE FORM

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Grievance Number</td>
</tr>
<tr>
<td>2.</td>
<td>Date: ( .../.../20)</td>
</tr>
<tr>
<td></td>
<td>First Name</td>
</tr>
<tr>
<td></td>
<td>Last Name</td>
</tr>
<tr>
<td></td>
<td>Occupation</td>
</tr>
<tr>
<td></td>
<td>Telephone Number:</td>
</tr>
<tr>
<td></td>
<td>E-mail address (if available):</td>
</tr>
<tr>
<td></td>
<td>Address:</td>
</tr>
<tr>
<td>3.</td>
<td>Contact Information:</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4. Description of Grievance including when it happened

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>5.</td>
<td>Signature of Aggrieved</td>
</tr>
<tr>
<td>6.</td>
<td>Received by</td>
</tr>
</tbody>
</table>

---

**TU MAD**

MADENCILIK SAMANYL VE İCRAAT A.Ş.
<table>
<thead>
<tr>
<th><strong>A- General Information</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grievance/Request Form Record No:</strong></td>
</tr>
<tr>
<td>(It should be same with the number on grievance/request admittance form)</td>
</tr>
<tr>
<td><strong>Recording Person:</strong></td>
</tr>
<tr>
<td><strong>Date:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>B- Concluding Grievance/ Request</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>This section shall be filled out and signed by the complaining/requesting person and Tümad Authority when the file is closed. In this section, information about how the grievance has been resolved or request has been met will be given; remarks stating that it has been agreed with grievance/request owner and signature will take placed. (Replies to the grievances received via internet will be expected by e-mail instead of signature)</td>
</tr>
<tr>
<td><strong>Remarks:</strong></td>
</tr>
<tr>
<td><strong>Date:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Name- Surname and Signature of Grievance/ Request Owner</strong></th>
<th><strong>On Behalf of TÜMAD</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Title- Name- Surname and Signature</strong></td>
<td></td>
</tr>
</tbody>
</table>
GRIEVANCE AND FEEDBACK RECORDING LIST (TMD_KTİ_LST_.001)

<table>
<thead>
<tr>
<th>ŞİAYET Tarihı</th>
<th>ŞİAYET Tarihi</th>
<th>ŞİAYET Eden</th>
<th>ŞİAYET Konusu</th>
<th>İlgili Brüt Kararı</th>
<th>Ruku Beraatı</th>
<th>Aşılama</th>
<th>Durumu</th>
<th>ŞİAYET Qadınması</th>
</tr>
</thead>
</table>
APPENDIX 2 - FLOWCHART OF GRIEVANCE MECHANISM
APPENDIX 3 - STAKEHOLDER ENGAGEMENT ACTIVITIES UP TO DATE AND MEDIA NEWS ABOUT THE PROJECT

24 December 2014, Çanakkale Lapseki Public Engagement Meeting

School visit, charity and participation to social activities by General Manager and Assistant Operation Manager

TÜMAD Madencilik A.Ş. General Manager has been informing relevant parties and stakeholders about the Project and local employment, at an economy program on a national TV channel named Kanal A.
Two best seller newspapers on Turkey, General Manager of TÜMAD and, Board of Director of Turkish Gold Miners Association (Let’s look at underground instead of cushion of capital)

A ceremony organized for vehicles granted by TÜMAD Madencililik

Transportation company incorporation establishment meeting