



CONTRACTOR ENVIRONMENTAL MANAGEMENT HANDBOOK



THE PURPOSE OF THIS HANDBOOK IS TO BRIEF CONTRACTORS AND THEIR STAFF ABOUT HOW TO COMPLY WITH HELLAS GOLD S.A.'S ENVIRONMENTAL REQUIREMENTS AND WITH THE LAW.

COPIES OF THIS HANDBOOK ARE PROVIDED AND SIGNED BY ASSOCIATED CONTRACTORS WHEN THE CONTRACT IS SIGNED, BEFORE WORK COMMENCES.



THINK GREEN

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1. INTRODUCTION

The Contractor Environmental Management Handbook is included in all tender notices or projects awarded at Hellas Gold S.A.'s mining facilities, and forms an integral part of the relevant contracts. The primary objective is to ensure compliance with legislative and other requirements and compliance with the requirements of our company's Environmental Management System and Environmental Policy and Energy Efficiency Management Policy.

This Handbook does not release contractors from their legal obligations set out in Greek law, the Mining and Quarrying Operations Regulations (MQOL) relating to environmental issues, and their obligations and duties as contractors. It is self-evident that this Handbook cannot include all possible eventualities and there could be situations which require additional safety measures which the contractor is obliged to agree to implement. It should be pointed out that contractors are obliged to train their staff about environmental and energy management issues at regular intervals, and in all events before the project commences. This Contractor Environmental Management Handbook must form part of the core staff training materials.

2. OBJECTIVES

The company undertakes to provide all assistance to associates / contractors and their staff and offer them a safe environment. To achieve that objective it is essential that:

- ◆ All associates / contractors must be aware of and comply with the procedures deriving from **HELLAS GOLD'S** Environmental Management System implemented and certified in accordance with the ISO 14001:2015 standard and the ISO 50001:2011 standard.
- ◆ All associates / contractors must be aware of and comply with legislative and other regulatory requirements.
- ◆ All associates / contractors must be briefed about and comply with **Hellas Gold S.A.'s Environmental Policy** and **Energy Efficiency Management Policy**.

3. DEFINITIONS

SUPERVISED CONTRACTORS: Employees of associated companies who carry out work, whose duties are similar to those of our own employees, and who work under our supervision. These companies are responsible for selecting and recruiting their own staff and for covering all benefits staff are entitled to.

INDEPENDENT CONTRACTORS: Associated companies who undertake to carry out entire projects using their own staff and equipment, used each year or periodically.

4. BEFORE CONTRACTORS START WORK

Before contractors start work it is essential to ensure that:

No work is carried out without the relevant contract having first been signed or the purchase order having been placed with a company mutually acceptable to the contracting parties. The contract automatically gives the contractor the power to carry out the agreed tasks.

The contractor's staff will receive induction training from our company's Environment Manager.

Before starting work contractors must assess their own environmental risk and if necessary must provide our Company with a Written Environmental Risk Assessment.

If necessary, contractors must provide our Company with certificates, licenses, Materials Safety Data Sheets, drawings, etc.

5. INDUCTION TRAINING

After work is assigned but before it starts, the Contractor's staff will be trained / briefed by our company's Environment Manager about the Environmental Management System requirements.

They will be briefed about how to deal with emergencies and the location of muster points, fire-fighting equipment and infirmaries will be indicated to them.

6. SITE DETAILS

Before work commences, the contractor's representative will be briefed and taken around by the project manager to show him the predefined site at which the work crews can set up and the site for equipment and vehicles.

The contractor's manager will brief the project manager about the schedule of works and the time at which equipment and materials will start to arrive. All necessary measures must be taken to safely store them temporarily to avoid any spills and, if necessary, essential spill kits must be provided.

7. GENERAL RULES

No work is carried out without the relevant contract having first been signed or the purchase order having been placed with a company mutually acceptable to the contracting parties. The contract automatically gives the contractor the power to carry out the agreed tasks.

There will be an **authorised representative** of the Company for all tasks, who will be the liaison between the contractor and **Hellas Gold S.A.** Likewise, the contractor is obliged to have an **engineer of record** for each project being carried out. The names of these persons on both sides will be recorded in the relevant contract or purchase order.

In line with Presidential Decree 17/1996 (Government Gazette 11/A/18.1.1996) as supplemented by Presidential Decree 159/1999 (Government Gazette 157/A/3.8.1999) each contractor is obliged to train its permanent or part-time staff and any new recruits about the content of the Contractor Environmental Management Handbook which is part of the core training materials for the contractor's staff. That training must be provided at least twice a year for each employee by the engineer or engineers' on the contractor's staff responsible for the project, in cooperation with Hellas Gold S.A.'s Environment Department.

8. COMMUNICATION AND CONSULTATION

Contractors must maintain effective communication with the Environment Department and provide briefings – make suggestions about issues arising during implementation of the project.

When requested, Contractors must participate in meetings to improve environmental management.

9. EMPLOYEES

The contractor's staff must comply with all rules on environmental protection, comply with suggestions from the Company's managers and must not prevent the problem-free operation of sites.

They must be trained and hold suitable certificates / licenses for each case.

10. HOUSEKEEPING

The contractor's staff must keep the worksite clean and tidy.

Floors and access routes must be kept free of obstacles and materials, to allow employees to pass safely.

Safe access and exit from the worksite must be guaranteed.

Waste from staff activities must be managed in a way that complies with the Company's waste management procedure.

At the end of each task Contractors must restore the worksite to its original condition.

11. EQUIPMENT

Contractors are obliged to use the appropriate equipment for each case, to ensure that equipment is in excellent conditions and certified for the work tasks it is to be used for. Certificates must be available upon request.

Contractors are also responsible for maintaining equipment and products generated must be managed in accordance with the legislative and other regulatory environmental requirements.

Contractors must ensure that there are adequate spill kits depending to the materials being used and the work being carried out.

Contractors are responsible for ensuring that their employees are supplied with the equipment required based on the project's technical specifications. Where there is defective equipment, the Company's manager shall be entitled to prohibit its use.

12. VEHICLES

Vehicles must have all licenses and certificates required and must be handed over to the project manager. Contractors are responsible for keeping vehicles operational and safe. They must clearly display their company logo.

All project vehicles must be fitted with spill control systems.

Drivers must have the necessary licenses which must be handed over to the project manager, and they must be trained in all to deal with environmental degradation emergencies.

Contractor vehicles must follow preordained routes and park at predefined locations set by the Company's representative, and must not drive around without special permission of main roads at the site.

The speed at site must not exceed **20km/hour**.

All vehicles must give way to heavy-duty vehicles and to Company vehicles.

It is not permitted for the employees of contractors to drive or use **Hellas Gold S.A.'s** vehicles unless this is deemed necessary and special authorisation has been given by the project manager.

Before vehicles leave the site, they must necessarily first go through the vehicle tyre wash.

13. CHEMICALS

No task involving chemicals may be carried out unless special permission has been obtained.

Contractors must take into account all special terms included in the work permit.

Contractors are obliged to report any hazardous substances which will be used, the quantity of materials to be used and to provide the project manager with the relevant Materials Safety Data Sheets (MSDS).

Those materials are to be used and stored in accordance with the Hellas Gold manager's instructions, at a location indicated to the contractor, with all measures to ensure safe usage, storage and spill control being taken. Containers must be marked and be in good condition and leak-free. The contractor must remove empty containers in accordance with the procedure set out the MSDS and the legislative requirements. Evidence of safe disposal must be available to the Project Manager upon demand.

If there are any leaks, contractors must immediately shut off the leak at source, prevent or contain the spread of the leak and immediately implement the spill control procedure using equipment suitable in each case, as specified in the MSDS.

All materials used to control and collect spilled liquids must be removed by the contractor in compliance with the legislative requirements.

The project manager must be immediately notified about any spillage no matter how unimportant it is thought to be. All necessary information must be provided to allow the Environmental Incident Report form to be filled out as part of Hellas Gold's Environmental Management System.

14. PPE

Use of basic personal protective equipment (dungarees, safety boots, helmets, phosphorescent orange waistcoats bearing the company name) is mandatory.

Special PPE must be used depending on the work area and nature of the work. The PPE needed may depend on the special nature of the project, the work permits, or the technical description for how work is to be carried out.

Contractors are responsible for providing the PPE needed in each case. PPE must be in good condition and there must be additional PPE available in the case where certain items are damaged, so that it can be immediately replaced.

15. FIRE

Fires are the most dangerous situation that can happen at the project site and even the smallest fires must be dealt with immediately.

All contractor staff must be briefed and training about how to deal with fires and use fire-fighting equipment. Fire-fighting equipment may either belong to the contractor if that is considered necessary and is required, or may belong to **Hellas Gold S.A.**

If the fire is limited in size, contractors must use the appropriate equipment to deal with it, and must also contact the project manager.

If the fire is extensive, immediately notify the project manager or the nearest company employee to initiate the emergency response procedure.

16. EVACUATION

In the event of an environmental accident/ degradation the competent staff of **Hellas Gold S.A.** must be notified. In all events, contractors are obliged to have an emergency plan in place which must be in line with Hellas Gold's general emergency plan and a crisis manager must be appointed who will liaise with Hellas Gold's managers and the authorities.

If emergencies require total or partial evacuation, the contractor's employees must:

- Immediately stop all work. Disconnect equipment from any electrical or other supply.
- Leave the site by the closest exit following the escape route. Leave on foot, without running.
- Move to the nearest muster point and provide their particulars to the Company employee recording who is present.
- Provide particulars of the materials and equipment being stored that could result in the situation worsening.

17. ENVIRONMENT

Contractors are responsible for protecting the environment and implementing all Company requirements deriving from its ISO 14001:2015 certified Environmental Management System and ISO 500001:2011 Energy Management System, and for complying with legislative and other regulatory requirements.

Learn about Hellas Gold S.A.'s Environmental Policy and Energy Efficiency Management Policy. It is your obligation to comply with Company policy.

18. WASTE MANAGEMENT

Contractors must ensure that waste is managed in a manner compatible with the environmental regulations and the applicable legislation and with the procedures implemented by **Hellas Gold S.A.**

To protect the environment, waste needs to be reduced and as much possible should be re-used / recycled.

Make sure in each case that waste is disposed of in a suitable container or temporary storage site, with the consent of the project manager.

Contractors are responsible for managing hazardous waste or waste requiring special treatment.

Remember: *Ask for advice before disposing of any waste.*

19. GENERAL

Environmental Protection by everyone working at **Hellas Gold S.A.** is of primary importance.

We are proud of our indicators and the results we have managed to achieve and we want you to help us remain proud.

If you have any doubts or queries **ASK FOR INFORMATION OR ASSISTANCE.**