

MACOM

ENVIRONMENT & ENERGY

MUTLU HYBRID POWER PLANT (WPP & SPP) PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Plan Code
ESMP-F-2015630-01

Owner of Activity
Mutluer Enerji Üretim
Yatırım İnşaat Madencilik
Sanayi ve Ticaret A.Ş.

Date
19.11.2024



MACOM

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PROJECT NAME : MUTLU HYBRID POWER PLANT (WPP & SPP) PROJECT
SCOPE OF PLAN : ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Owner of Activity Mutluer Enerji Üretim Yatırım İnşaat Madencilik Sanayi ve Ticaret A.Ş.
Location of Activity Selçuklu / Konya

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Plan Issuance History

Version	Explanation	Date
1	Plan Presentation	19.11.2024

Date of Plan :19-Nov-2024

Plan Code : ESMP-F-2015630-01

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DICTIONARY AND ABBREVIATIONS

Word	Description
ADR	: European Agreement Concerning the International Transport of Hazardous Goods by Road
CHS	: Community Health and Safety
CHSMP	: Community Health and Safety Management Plan
CMMP	: Contractor Management and Monitoring Plan
CoC	: Code of Conduct
CPA	: Corrective-Preventive Action
CSMP	: Construction Site Management Plan
E&S	: Environmental and Social
EHS	: Environmental, Health and Safety
EIA	: Environmental Impact Assessment
EPRP	: Emergency Preparedness and Response Plan
ESHS	: Environmental, Social, Health and Safety
ESMP	: Environmental and Social Management Plan
ESS	: Environmental and Social Standard
GBV	: Gender-Based Violence
GM	: Grievance Mechanism
HGSA or TMGD	: Hazardous Goods Safety Advisor
HMMP	: Hazardous Material Management Plan
HR	: Human Resources
HS or H&S	: Health and Safety
HSE	: Health, Safety and Environment
IEIS	: Integrated Environmental Information System
IFC	: International Finance Corporation
ILO	: International Labour Organisation
KDS	: Mass Balance System
KPI	: Key Performance Indicator
MACOM	: MACOM Çevre Enerji ve Teknoloji Yatırımları Limited Şirketi
MOTAT	: Mobile Waste Tracking System
MSDS	: Material Safety Data Sheet
Mutluer Enerji	: Mutluer Enerji Üretim Yatırım İnşaat Madencilik Sanayi ve Ticaret A.Ş.
OHS	: Occupational Health and Safety
OHSMP	: Occupational Health and Safety Management Plan
OSS	: Occupational Safety Specialist
PPE	: Personal Protective Equipment
PS	: Performance Standards
REPPP	: Resource Efficiency and Pollution Prevention Plan
SCMP	: Supply Chain Management Plan
SEA	: Sexual Exploitation and Abuse

Word	Description
SEP	: Stakeholder Engagement Plan
SERP	: Spill Emergency Response Procedure
SH	: Sexual Harassment
SoW	: Scope of Work
SP	: Security Plan
SPP	: Solar Power Plant
SSI	: Social Security Institution
TABS	: Waste Declaration System
TMP	: Traffic Management Plan
TP	: Training Plan
UN	: United Nations
WB	: World Bank
WBG	: World Bank Group
WPP	: Wind Power Plant
WWMP	: Waste and Wastewater Management Plan

1. INTRODUCTION

This Environmental and Social Management Plan (hereinafter will be referred as “**the Plan**” or “**the ESMP**”) has been prepared by MACOM Çevre Enerji ve Teknoloji Yatırımları Limited Şirketi (MACOM) for the Mutlu 5 Wind Power Plant (WPP) and Solar Power Plant (SPP) Project (“hereinafter will be referred as “**the Project**” or “**Mutlu 5 Hybrid**”) operated for the owner of the activity company Mutluer Enerji Üretim Yatırım İnşaat Madencilik Sanayi ve Ticaret A.Ş. (**Mutluer Enerji**) within the administrative borders of Selçuklu District of Konya Province.

1.1 Objectives

The main objective of the Plan is to set the applicable national and international standards, determine the roles and responsibilities, identify the mitigation measures and monitoring activities, and specify the Key Performance Indicators, concerning all environmental and social aspects and their implementations. The Plan also provides relevant major training and reporting requirements.

1.2 Scope

This Plan covers all construction and operation activities (including the Contractors’ and subcontractors’) performed for Mutlu Hybrid. All Project employees are responsible for complying with the provisions of this ESMP.

This ESMP is closely related to and will be implemented together with the following sub-management plans:

- Construction Site Management Plan (CSMP)
- Stakeholder Engagement Plan (SEP)
- Grievance Mechanism (GM)
- Waste and Wastewater Management Plan (WWMP)
- Biodiversity Action Plan (BAP)
- Hazardous Material Management Plan (HMMP)
- Spill Emergency Response Procedure (SERP)
- Traffic Management Plan (TMP)
- Emergency Preparedness and Response Plan (EPRP)
- Occupational Health and Safety Management Plan (OHSMP)
- Community Health and Safety Management Plan (CHSMP)
- Resource Efficiency and Pollution Prevention Plan (REPPP)
- Contractor Management and Monitoring Plan (CMMP)
- Security Plan (SP)
- Training Plan (TP)

2. PROJECT BACKGROUND

2.1 General Information

Mutlu 5 Wind Power Plant (WPP) stands as the central pillar of the Mutlu 5 Project, operating as a WPP since obtaining its production license in 2011. Featuring 13 turbines supplied by Vestas, the plant boasts a combined capacity of 46.84 MWm/44 MWe, effectively contributing to Türkiye's renewable energy landscape. Its seamless integration into the national grid aligns with regulatory standards, with Mutluer Enerji maintaining full ownership of the project.

To bolster energy production during periods of low wind activity, Mutlu 5 WPP is complemented by Mutlu 5 Solar Power Plant (SPP). This strategic addition ensures a continuous and reliable energy supply. The SPP spans two polygons (SPP-1 and SPP-2), covering a total area of 37.1 hectares and contributes 25 MWm/MWe. Operating within the framework of environmental and social regulations, the combined Renewable Energy Source, Mutlu 5 Hybrid, adhere to international guidelines, emphasizing their commitment to sustainable practices.

The energy generated by Mutlu 5 Hybrid is seamlessly integrated into the national grid through a 154 kV TCDD Gözlü TM – Aşağıpınarbaşı TM Energy Transmission Line.

To increase the capacity of Mutlu 5 Hybrid, it has been planned the construction and installation of 7 additional wind turbines (T14, T15, T16, T17, T18, T19 and T22) and an additional 28.4-hectare solar polygon (SPP-3) with 19-MWm capacity.

2.2 Project Location

The Project is located within the boundaries of Bağrıkurt Neighborhood, Meydanköy Neighborhood, Çandır Neighborhood and Çaltı Neighborhood. The capacity increase project regarding the additional turbines will be within the borders of Meydanköy Neighborhood and the additional solar polygon, SPP-3, in the borders of Çaltı Neighborhood. The Project Location Map showing all components of Mutlu 5 Hybrid including the capacity increase elements is given in Figure 2-1.

Close settlement around the Project is given in Table 2-1.

Table 2-1: Settlements Around the Project

Settlement	Latitude	Longitude	Nearest Project Component	Distance (m)
Bahçesaray	38.152949	32.459674	T19	4,329
Bağrıkurt	38.131667	32.476776	T18	4,114
Dağdere	38.173073	32.482903	T19	2,402
Meydanköy	38.171509	32.526634	T15	1,220
Kınık	38.201476	32.546836	T22	2,013
Çaltı	38.104430	32.553229	SPP-3	3,647
Çandır	38.132331	32.606884	T13	4,035
Güvenç	38.163699	32.654998	T13	7,466

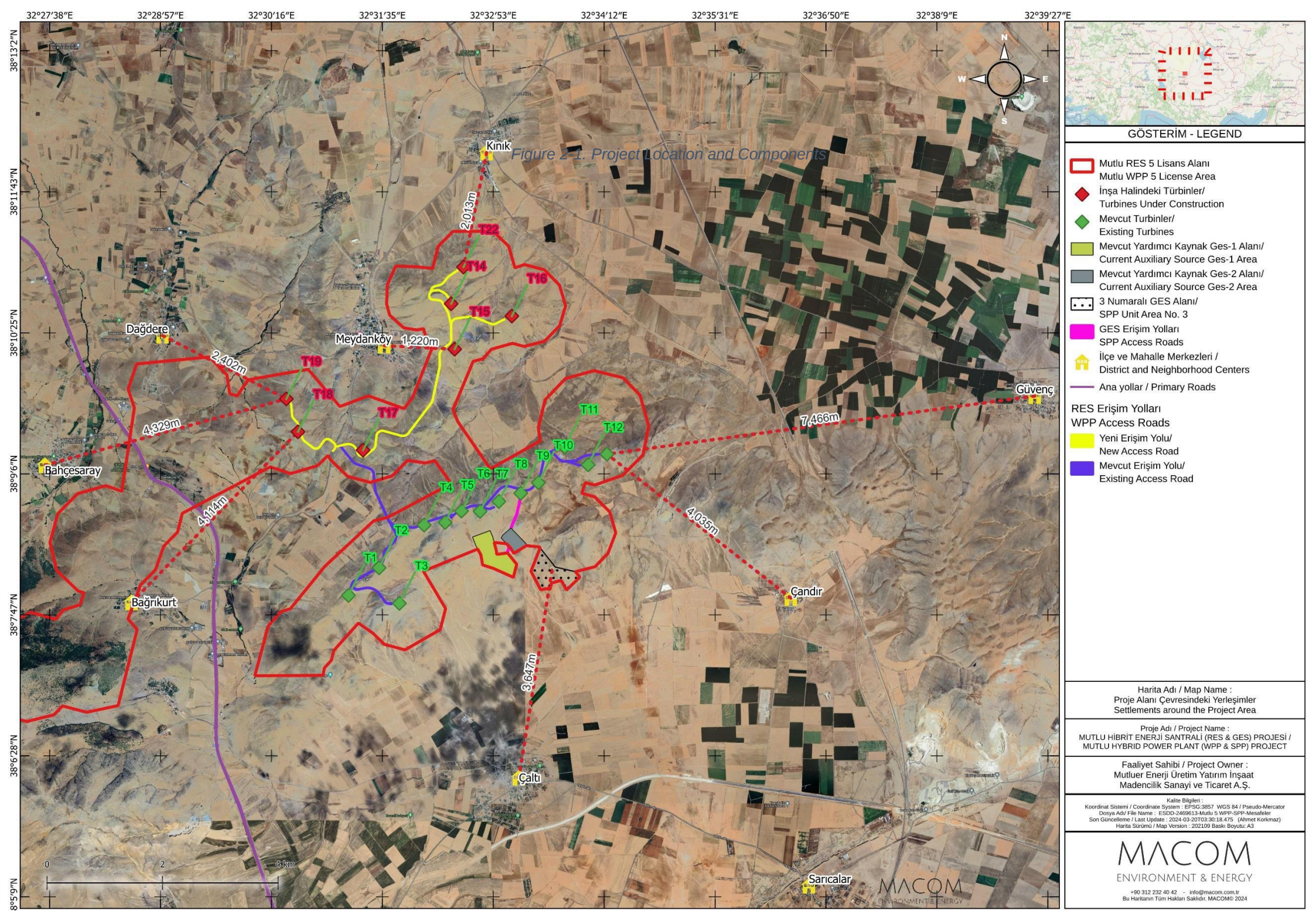


Figure 2-1. Project Location and Components

GÖSTERİM - LEGEND

- ▭ Mutlu RES 5 Lisans Alanı
Mutlu WPP 5 License Area
- ◆ İnşa Halindeki Türbinler/
Turbines Under Construction
- ◆ Mevcut Türbinler/
Existing Turbines
- ▭ Mevcut Yardımcı Kaynak Ges-1 Alanı/
Current Auxiliary Source Ges-1 Area
- ▭ Mevcut Yardımcı Kaynak Ges-2 Alanı/
Current Auxiliary Source Ges-2 Area
- ▭ 3 Numaralı GES Alanı/
SPP Unit Area No. 3
- ▬ GES Erişim Yolları
SPP Access Roads
- 🏠 İlçe ve Mahalle Merkezleri /
District and Neighborhood Centers
- ▬ Ana yollar / Primary Roads
- ▬ RES Erişim Yolları
WPP Access Roads
- ▬ Yeni Erişim Yolu/
New Access Road
- ▬ Mevcut Erişim Yolu/
Existing Access Road

Harita Adı / Map Name :
Proje Alanı Çevresindeki Yerleşimler
Settlements around the Project Area

Proje Adı / Project Name :
MUTLU HİBRİT ENERJİ SANTRALİ (RES & GES) PROJESİ /
MUTLU HYBRID POWER PLANT (WPP & SPP) PROJECT

Faaliyet Sahibi / Project Owner :
Mutluer Enerji Üretim Yatırım İnşaat
Madencilik Sanayi ve Ticaret A.Ş.

Kalite Bilgileri
Koordinat Sistemi / Coordinate System : EPSG:3857 WGS 84 / Pseudo-Mercator
Dosya Adı / File Name : ESDD-2469613-Mutlu 5 WPP-SPP-Mesafeler
Son Güncelleme / Last Update : 2024-03-20 10:30:18.475 (Ahmet Korkmaz)
Harita Ölçümü / Map Version : 202309 Basık Boyut: A3

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3. NATIONAL AND INTERNATIONAL PROJECT STANDARDS

3.1 Applicable National Laws and Regulations

National laws and regulations regarding environmental, social and health and safety aspects, which are applicable to the Project, are summarized in Table 3-1.

Table 3-1. Applicable National Laws and Regulations

Law/Regulation Name (English)	Law/Regulation Name (Turkish)	Official Gazette Date	Official Gazette Number
Environmental Management			
Environmental Law	Çevre Kanunu	11.08.1983	18132
Groundwater Law	Yeraltı Suları Hakkında Kanun	23.12.1960	10688
Environmental Impact Assessment (EIA) Regulation	Çevresel Etki Değerlendirmesi Yönetmeliği	29.07.2022	31907
Regulation Concerning Environmental Management Services	Çevre Yönetimi Hizmetleri Hakkında Yönetmelik	01.11.2022	32000
Waste Management			
Waste Management Regulation	Atık Yönetimi Yönetmeliği	02.04.2015	29314
Regulation on Zero Waste	Sıfır Atık Yönetmeliği	12.07.2019	30829
Regulation on Control of Excavated Soil, Construction and Demolition Wastes	Hafriyat Toprağı, İnşaat ve Yıkıntı Atıklarının Kontrolü Yönetmeliği	18.03.2004	25406
Regulation on the Control of Packaging Waste	Ambalaj Atıklarının Kontrolü Yönetmeliği	26.06.2021	31523
Regulation on Control of Medical Wastes	Tıbbi Atıkların Kontrolü Yönetmeliği	25.01.2017	29959
Regulation on the Control of End-of-Life Tires	Ömrünü Tamamlamış Lastiklerin Kontrolü Yönetmeliği	25.11.2006	26357
Regulation of the Control of End-of-Life Vehicles	Ömrünü Tamamlamış Araçların Kontrolü Hakkında Yönetmelik	30.12.2009	27448
Regulation on Control of Waste Batteries and Accumulators	Atık Pil ve Akümülatörleri Kontrolü Yönetmeliği	31.08.2004	25569
Regulation on the Management of Waste Electrical and Electronic Appliance	Atık Elektrikli ve Elektronik Eşyaların Yönetimi Hakkında Yönetmelik	26.12.2022	32055
Regulation on the Management of Waste Oils	Atık Yağların Yönetimi Yönetmeliği	21.12.2019	30985
Regulation on Control of Waste Vegetable Oils	Bitkisel Atık Yağların Kontrolü Yönetmeliği	06.06.2015	29378
Communiqué on Waste Derived Fuel, Additional Fuel and Alternative Raw Materials	Atıktan Üretilmiş Yakıt, Ek Yakıt ve Alternatif Hammadde Tebliği	20.06.2014	29036
Water and Wastewater			
Regulation on Water Pollution Control	Su Kirliliği Kontrolü Yönetmeliği	31.12.2004	25687
Regulation on Protection of Groundwater Against Pollution and Deterioration	Yeraltı Sularının Kirlenmeye ve Bozulmaya Karşı Korunması Hakkında Yönetmelik	07.04.2012	28257
Regulation on Surface Water Quality	Yerüstü Su Kalitesi Yönetmeliği	30.11.2012	28483

Law/Regulation Name (English)	Law/Regulation Name (Turkish)	Official Gazette Date	Official Gazette Number
Regulation on Pits to be Constructed in Places Where Construction of Sewage Channels is Not Possible	Lağım Mecrası İnşası Mümkün Olmayan Yerlerde Yapılacak Çukurlara Ait Yönetmelik	09.03.1971	13783
Regulation on Water Intended for Human Consumption	İnsani Tüketim Amaçlı Sular Hakkında Yönetmelik	17.02.2005	25730
Regulation on Transportation of Hazardous Substances via Highways	Tehlikeli Maddelerin Karayoluyla Taşınmasına İlişkin Yönetmelik	24.04.2019	30754
Regulation on Control of Pollution Caused by Hazardous Substances in the Aquatic Environment and Its Surroundings	Tehlikeli Maddelerin Su ve Çevresinde Neden Olduğu Kirliliğin Kontrolü Yönetmeliği	26.11.2005	26005
Air Quality and Air Emissions			
Regulation on the Control of Industrial Air Pollution	Sanayi Kaynaklı Hava Kirliliği Kontrolü Yönetmeliği	03.07.2009	27277
Exhaust Gas Emission Control Regulation	Egzoz Gazı Emisyonu Kontrolü Yönetmeliği	11.03.2017	30004
Environmental Noise			
Environmental Noise Control Regulation	Çevresel Gürültü Kontrolü Yönetmeliği	30.11.2022	32029
Traffic Management and Safety			
Highway Traffic Law (No.2918)	Karayolları Trafik Kanunu (No.2918)	18.10.1983	18195
Road Transport Law (No.4925)	Karayolu Taşıma Kanunu (No.4925)	19.07.2003	25173
Law on Assigning Organizations Other than the General Directorate of Highways to the Construction, Maintenance and Operation of Access Controlled Highways (Motorways) (No.3465)	Karayolları Genel Müdürlüğü Dışındaki Kuruluşların Erişme Kontrollü Karayolu (Otoyol) Yapımı, Bakımı ve İşletilmesi ile Görevlendirilmesi Hakkında Kanun (No.3465)	02.06.1988	19830
Regulation on Highway Infrastructure Safety Management	Karayolu Altyapısı Güvenlik Yönetimi Hakkında Yönetmelik	21.10.2018	30572
Road Transport Regulation	Karayolu Taşıma Yönetmeliği	08.01.2018	30295
Highway Traffic Regulation	Karayolları Trafik Yönetmeliği	18.07.1997	23053 (repeated)
Regulation on the Transport of Hazardous Goods by Road	Tehlikeli Maddelerin Karayoluyla Taşınması Hakkında Yönetmelik	18.06.2022	31870
Regulation on Traffic Signs	Trafik İşaretleri Hakkında Yönetmelik	19.06.1985	18789
Regulation on the Precautions to be Taken in All Kinds of Works to be Done on the Structure of the Road in Terms of Ensuring Highway Traffic Safety and Other Signs, Lights and Markings Outside, on the Side or on the Highway	Karayolu Trafik Güvenliğinin Sağlanması Yönünden, Yolun Yapısında Yapılacak Her Türü Çalışmalarda Alınacak Tedbirler ile Karayolu Dışında, Kenarında veya Üzerindeki Diğer Levhalar, Işıklar ve İşaretlemeler Hakkında Yönetmelik	19.06.1985	18789

Law/Regulation Name (English)	Law/Regulation Name (Turkish)	Official Gazette Date	Official Gazette Number
Regulation on Facilities to be Built and Opened Alongside Highways	Karayolları Kenarında Yapılacak ve Açılacak Tesisler Hakkında Yönetmelik	15.05.1997	22990
Exhaust Gas Emission Control Regulation	Egzoz Gazı Emisyonu Kontrolü Yönetmeliği	11.03.2017	30004
Hazardous Material Management			
Regulation on Transportation of Hazardous Substances via Highways	Tehlikeli Maddelerin Karayoluyla Taşınmasına İlişkin Yönetmelik	24.04.2019	30754
Regulation on Control of Pollution Caused by Hazardous Substances in the Aquatic Environment and Its Surroundings	Tehlikeli Maddelerin Su ve Çevresinde Neden Olduğu Kirliliğin Kontrolü Yönetmeliği	26.11.2005	26005
Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals	Kimyasalların Kaydı, Değerlendirilmesi, İzni ve Kısıtlanması Hakkında Yönetmelik	23.06.2017	30105 (repeated)
Regulation on Inventory and Control of Chemicals	Kimyasalların Envanteri ve Kontrolü Hakkında Yönetmelik	26.12.2008	27092 (repeated)
Regulation on Classification, Packaging and Labeling of Hazardous Substances and Preparations	Tehlikeli Maddeler ve Müstahzarların Sınıflandırılması, Ambalajlanması ve Etiketlenmesi Hakkında Yönetmelik	26.12.2008	27092 (repeated)
Regulation on Safety Data Sheets for Harmful Substances and Mixtures	Zararlı Maddeler ve Karışımlara İlişkin Güvenlik Bilgi Formları Hakkında Yönetmelik	13.12.2014	29204
Regulation on Health and Safety Measures in Working with Chemical Substances	Kimyasal Maddelerle Çalışmalarda Sağlık ve Güvenlik Önlemleri Hakkında Yönetmelik	12.08.2013	28733
Regulation on the Vocational Training of Those to be Employed in Jobs Classified as Hazardous and Very Hazardous	Tehlikeli ve Çok Tehlikeli Sınıfta Yer Alan İşlerde Çalıştırılacakların Mesleki Eğitimlerine Dair Yönetmelik	13.07.2013	28706
Regulation on the Transport of Hazardous Goods by Road	Tehlikeli Maddelerin Karayoluyla Taşınması Hakkında Yönetmelik	18.06.2022	31870
Labor Management and Occupational Health and Safety			
Labor Law (No.4857)	İş Kanunu (No.4857)	10.06.2003	25135
Occupational Health and Safety Law (No.6331)	İş Sağlığı ve Güvenliği Kanunu (No.6331)	30.06.2012	28339
Social Insurance and General Health Insurance Law (No.5510)	Sosyal Sigortalar ve Genel Sağlık Sigortası Kanunu (No.5510)	16.06.2006	26200
Occupational Health and Safety Regulation in Construction Works	Yapı İşlerinde İş Sağlığı ve Güvenliği Yönetmeliği	05.10.2013	28786
Regulation on Duties, Authorities, Responsibilities and Training of Occupational Safety Specialists	İş Güvenliği Uzmanlarının Görev, Yetki, Sorumluluk ve Eğitimleri Hakkında Yönetmelik	29.12.2012	28512

Law/Regulation Name (English)	Law/Regulation Name (Turkish)	Official Gazette Date	Official Gazette Number
Regulation on Occupational Health and Safety in Temporary or Fixed-Term Works	Geçici veya Belirli Süreli İşlerde İş Sağlığı ve Güvenliği Hakkında Yönetmelik	23.08.2013	28744
Personal Protective Equipment (PPE) Regulation	Kişisel Koruyucu Donanım Yönetmeliği	01.05.2019	30761
Regulation on the Use of PPE in Workplaces	Kişisel Koruyucu Donanımların İşyerlerinde Kullanılması Hakkında Yönetmelik	02.07.2013	28695
Occupational Health and Safety Risk Assessment Regulation	İş Sağlığı ve Güvenliği Risk Değerlendirmesi Yönetmeliği	29.12.2012	28512
Regulation on the Procedures and Principles of Occupational Health and Safety Training of Employees	Çalışanların İş Sağlığı ve Güvenliği Eğitimlerinin Usul ve Esasları Hakkında Yönetmelik	15.05.2013	28648
Regulation on Occupational Health and Safety Boards	İş Sağlığı ve Güvenliği Kurulları Hakkında Yönetmelik	18.01.2013	28532
Regulation on Health and Safety Measures to be Taken in Workplace Buildings and Extensions	İşyeri Bina ve Eklentilerinde Alınacak Sağlık ve Güvenlik Önlemlerine İlişkin Yönetmelik	17.07.2013	28710
Regulation on Fire Protection of Buildings	Binaların Yangından Korunması Hakkında Yönetmelik	19.12.2007	26735
Regulation on Emergency Situations in Workplaces	İşyerlerinde Acil Durumlar Hakkında Yönetmelik	18.06.2013	28681
First Aid Regulation	İlk Yardım Yönetmeliği	29.07.2015	29429
Regulation on the Protection of Employees from the Dangers of Explosive Environments	Çalışanların Patlayıcı Ortamların Tehlikelerinden Korunması Hakkında Yönetmelik	30.04.2013	28633
Workplace Hazard Classes Communiqué on Occupational Health and Safety	İş Sağlığı ve Güvenliğine İlişkin İşyeri Tehlike Sınıfları Tebliği	26.12.2012	28509
Regulation on the Protection of Employees from Noise-Related Risks	Çalışanların Gürültü ile İlgili Risklerden Korunmalarına Dair Yönetmelik	28.07.2013	28721
Regulation on the Protection of Employees from Vibration Related Risks	Çalışanların Titreşimle İlgili Risklerden Korunmalarına Dair Yönetmelik	22.08.2013	28743
Regulation on Health and Safety Conditions in the Use of Work Equipment	İş Ekipmanlarının Kullanımında Sağlık ve Güvenlik Şartları Yönetmeliği	25.04.2013	28628
Regulation on Health and Safety Measures in Working with Chemical Substances	Kimyasal Maddelerle Çalışmalarda Sağlık ve Güvenlik Önlemleri Hakkında Yönetmelik	12.08.2013	28733
Health and Safety Signs Regulation	Sağlık ve Güvenlik İşaretleri Yönetmeliği	11.09.2013	28762
Dust Control Regulation	Tozla Mücadele Yönetmeliği	05.11.2013	28812
Regulation on the Vocational Training of Those to be Employed in Dangerous and Very Dangerous Classes of Work	Tehlikeli ve Çok Tehlikeli Sınıfta Yer Alan İşlerde Çalıştırılacakların Mesleki Eğitimlerine Dair Yönetmelik	13.07.2013	28706
Cultural Heritage			

Law/Regulation Name (English)	Law/Regulation Name (Turkish)	Official Gazette Date	Official Gazette Number
Law on the Protection of Cultural and Natural Assets (No. 2863)	Kültür ve Tabiat Varlıklarını Koruma Kanunu (No. 2863)	23.07.1983	18113

3.2 Applicable International Standards and Guidelines

The fundamental international standards and guidelines applied within the scope of Mutlu 5 Hybrid activities are given as follows:

- International Finance Corporation (IFC) Performance Standards (PSs),
- IFC Environmental, Health and Safety (EHS) General Guidelines,
- World Bank (WB) Environmental and Social Standards (ESSs),
- EHS Guidelines for Electric Power Transmission and Distribution,
- EHS Guidelines for Wind Energy (August 7, 2015),
- Relevant European Union legislation provisions,
- International Conventions and Protocols to which Türkiye is a party.

Within the scope of the Project the applicable IFC PSs are listed below:

- PS 1: Assessment and Management of Environmental and Social Risks and Impacts
- PS 2: Labor and Working Conditions
- PS 3: Resource Efficiency and Pollution Prevention
- PS 4: Community Health, Safety, and Security
- PS 5: Land Acquisition and Involuntary Resettlement
- PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PS 8: Cultural Heritage

4. HSE AND SOCIAL ORGANIZATION

Mutluer Enerji has the overall responsibility for the work of all environmental and social issues, implementations, and management. The HSE Responsible will be responsible for implementing this Plan. Roles and responsibilities for E&S management for the Mutlu 5 Hybrid are described in detail in the following section of this document.

The requirements set out in this Plan apply to all Mutlu 5 WPP and SPP activities, including those carried out by contractors.

Detailed operating procedures will be developed by Mutluer Enerji to set out specific instructions for implementation of the requirements of this Plan.

4.1 General Organizational Structure

The general organizational structure of Mutlu 5 Hybrid Project is given in Figure 4-1, and key roles regarding the resource efficiency and pollution prevention within Mutluer Enerji is marked on the following figure.

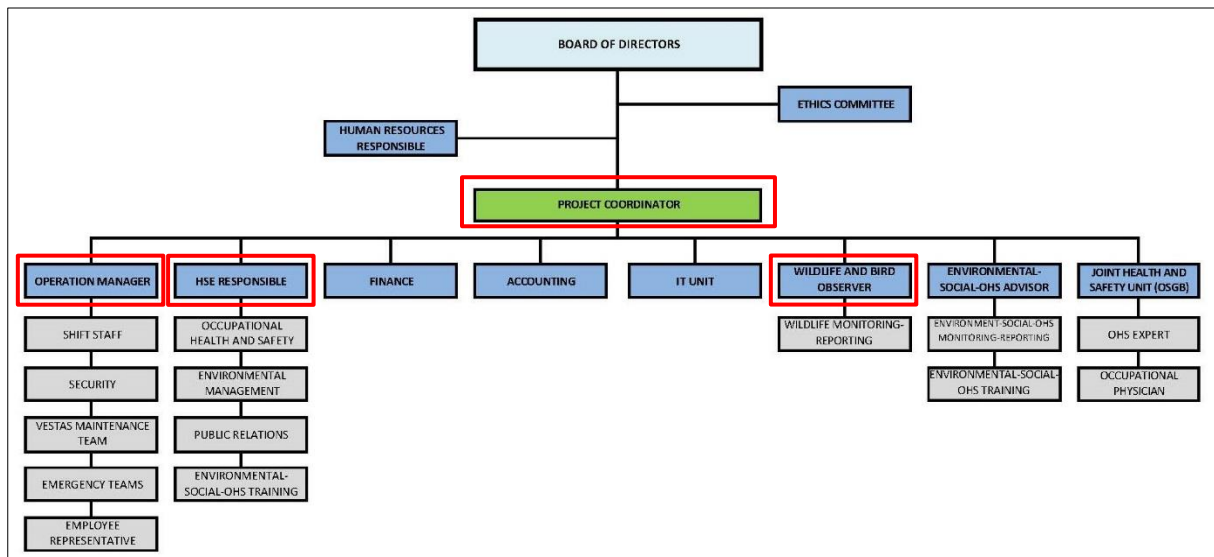


Figure 4-1: General Organizational Structure of Mutlu 5 Hybrid Project

4.2 Roles and Responsibilities

The key roles and responsibilities regarding the resource efficiency and pollution prevention is given in the following table:

Table 4-1. Key Roles and Responsibilities

Roles	Responsibilities
Project Coordinator	Provides the necessary resources for the approval and implementation of this Plan. Increases staff skills and motivation and manages the workforce. Provides resources for personnel training and ensures performance evaluations. Ensures that provisions on environmental, HSE and social requirements are included in subcontractor assignments to ensure compliance with national legislation and relevant international standards by contractors and subcontractors. Gives approval on matters requiring notification as a result of possible accidents.
Operations Manager (Site Chief during construction)	Leads to the execution of the system related to this Plan, monitors and evaluates its performance and ensures continuous improvement. Transfers information regarding the implementation performance of this Plan to the Project Coordinator. Provides necessary information to employees/subcontractors regarding this Plan. Controls the permissions and notifications to be received. Accompanies the consultants and the personnel of the institution who come for the audit.
HSE Responsible (and Occupational Safety Specialist (OSS))	Coordinates the Project's activities related to this Plan Provides necessary information to employees/subcontractors regarding this Plan. After detecting the subcontractors' deficiencies/errors in the implementation of the plan, communicates the situation to the subcontractor in writing and provides the necessary technical support to take the relevant measures/arrangements. Determines the necessary measurements and ensures that they are made. Develops and monitors this Plan to improve it, and makes relevant audits and revisions. Provides/ensures necessary training. Conducts internal audits and reports any nonconformities detected during internal audits. Opens requests to provide suitable and sufficient recycling containers to minimize waste generation. Informs subcontractors of their obligations in waste management. Records natural resource consumption and follows the determined reduction targets. Prepares a monthly report and submits it to the Project Coordinator/Operations Manager. Accompanies consultants and institution personnel who come for inspection. Ensures that Environmental Files are complete and up to date.

Roles	Responsibilities
<p>Environmental Consultant</p>	<p>Registers the business in the Integrated Environmental Information System (ECIS) of the Ministry of Environment, Urbanization and Climate Change.</p> <p>Provides environmental awareness, waste and zero waste management training.</p> <p>Ensures that the waste management plan is kept up to date.</p> <p>Informs the Employer of changes regarding the monitoring of national environmental legislation.</p> <p>Makes Annual Waste Declaration.</p> <p>Follows up on eliminating deficiencies in the hazardous waste temporary storage area and obtaining insurance.</p> <p>Checks leak-proof septic tank and sewage tank records.</p> <p>Provides support in collecting offers from licensed facilities.</p> <p>Establishes the leak-spill emergency response plan and team, provides practical training, and monitors and organizes the provision of equipment.</p> <p>Controls leak-spill response equipment.</p> <p>Provides technical support for the provision of suitable containers for waste collection.</p> <p>Creates transportation requests through ECBS for the shipment of hazardous wastes to licensed companies and organizes waste deliveries.</p> <p>Prepares and keeps up to date the environmental dimension impact analysis and life cycle.</p> <p>Ensures that the necessary work is carried out to obtain the Basic Zero waste certificate.</p> <p>Supports annual generator operating hour notifications.</p> <p>Checks the temporary waste storage area for compliance with legislation.</p> <p>Monitors that all waste generated is sent to licensed facilities appropriately.</p> <p>Checks that records are kept of the waste coming to and sent from the waste area.</p> <p>Makes annual entries into the Waste Declaration system.</p> <p>Ensures that Environmental Files are complete and up to date.</p>
<p>Environmental Managers/Responsibles of the Contractor</p>	<p>Ensures compliance with project standards and contracts.</p> <p>Ensures that relevant incompatibilities are recorded and resolved immediately.</p> <p>Conducts internal audits and reports any nonconformities detected during internal audits.</p> <p>Participates in the development of corrective or preventive actions when necessary.</p> <p>Ensures that relevant training is provided.</p> <p>Ensures that Environmental-Social-OHS and workforce issues are included in the monthly Environmental-Social-OHS review and that incident reports are prepared for Project Management.</p> <p>Ensures that pollution prevention management is carried out in accordance with this plan.</p> <p>Informs the Employer of natural resource consumption,</p> <p>In contracts made with subcontractors, the subcontractor is given the responsibility of removing all kinds of waste resulting from their</p>

Roles	Responsibilities
	<p>operations from the field in accordance with the legislation. Follows up subcontractors accordingly.</p> <p>The subcontractor will not discharge cement residue and other wastes into discharge channels or waterways during the works carried out in and around the workplace site. It carries out the necessary follow-ups in this regard.</p> <p>Prepares a monthly report and submits it to the Employer.</p>
Human Resources (HR) Responsible	<p>Coordinates the activities of the project related to this Plan.</p> <p>Fulfills assigned responsibilities in line with the plan.</p> <p>Ensures effective communication with local people within the scope of the project.</p> <p>Coordinates communication with local people in emergency situations.</p> <p>Monitors and makes relevant inspections and revisions in order to develop and improve this Plan.</p>
Wildlife and Bird Observer	<p>In cases where there is intense migration during migration periods in the field, it notifies the operation of risky turbines and ensures that they are stopped.</p> <p>Observes the movements of wildlife and birds in the region and makes the necessary reports.</p>
All Employees, Contractors and Subcontractors	<p>Ensure compliance with project standards and contracts.</p> <p>Ensure that relevant incompatibilities are recorded and resolved immediately.</p> <p>Participate in the development of corrective or preventive actions when necessary.</p> <p>Ensure that relevant training is provided.</p> <p>Act in accordance with this ESMP and other sub-management plans.</p> <p>In the contracts made with subcontractors, the subcontractor is given the responsibility of removing all kinds of waste resulting from their operations from the field in accordance with the legislation.</p>

5. GENERAL PRINCIPLES

5.1 General Waste Management Principles

The primary objectives of Waste Management are:

- To identify different waste types defined by international and local regulations;
- To define separation methods;
- To be the main source in obtaining waste transportation and disposal permits;
- To establish and monitor the general criteria necessary to prevent or minimize any environmental impact or pollution that may occur during the works;
- Define recording, observation and waste monitoring instructions;
- Potential pollutants, spills, etc. that may arise from construction activities. predicting accidents, determining their effects and developing appropriate arrangements for safety controls;
- Define waste management and responsibilities, including proper disposal.

Waste management practices will occur in a hierarchical way that includes the following:

- Prevention of the waste generation,
- Minimization of the waste at the source,
- Reuse of the waste,
- Recycle of the waste,
- Energy recovery from the waste,
- Proper disposal of the waste.

In the contracts made with the Subcontractors for the construction and operation activities within the scope of the project, the Subcontractor is given the responsibility of removing all kinds of waste arising from the operations carried out from the site in accordance with the legislation.

Within the scope of the Project, food needs for employees during the construction and operation phases are met from outside, and no cooking is done on site. Therefore, there is no generation of waste vegetable oil.

For important elements of waste management; which are classifying waste by type, collecting waste in appropriate containers, storing the waste storage area appropriately and sending it to licensed facilities (recycling, recovery or disposal), recording of waste and making relevant legal notifications, and preparing an Industrial Waste Management Plan; please refer to WWMP.

5.2 General Wastewater Management Principles

The general principles of wastewater management are similar to waste management:

- In the first place, reducing wastewater generation and thus reducing unnecessary water use,
- Preventing the discharge of wastewater to soil, surface water or groundwater resources without treatment,
- Preventing wastewater from mixing with other types of wastewaters (e.g. industrial wastewater, rainwater, etc.),
- Collection of wastewaters in sealed septic tanks or directly discharged to sewage systems ending with a wastewater treatment plant to prevent wastewater from mixing with the soil and other clean water resources,
- Processing the wastewater by the necessary treatment procedures according to its type, i.e. its pollutant load,
- Reuse of wastewater that has been treated in accordance with standards and meets limit values in different ways (such as plant irrigation).

Please refer to WWMP for details regarding principles and mitigation measures of water use and wastewater management.

5.3 General Principles on Noise Management

Noise impacts should not exceed a maximum of 3 dB increase in background levels at the nearest receiving location off-site. If it is exceeded, measures will be taken to reduce the noise level.

The following issues will be taken into consideration in order to prevent the noise that will occur in the project site from spreading too much.

- Machines will be shut down when in standby and not in operation.
- Periodic maintenance of vehicles and equipment will be carried out.
- Turbines will be maintained regularly.

Noise limits determined by national legislation and international standards are given in Table 8. Among the existing legislation, standards and International Good Industrial Practices (GIIP) documents, only the Turkish Environmental Noise Control Regulation contains specific noise limits for the construction phase, while others have limits valid for the operation phase.

There are no settlements within the operational area of Mutlu 5 WPP and auxiliary source SPP. The closest settlement centers are Meydanköy Neighborhood Center and Çaltı Neighborhood Center, 3 km away. Since it is more than 500 meters away from residential areas, environmental noise measurements were not made during the construction phase. No complaints were received regarding this issue during construction.

5.4 General Principles on Air Quality Management

There is no emission source in the RES and auxiliary source SPP operation. Therefore, there are no legal and/or IFC requirements for the operational phase.

The heating of the business building is provided by air conditioning. There is no central heating system.

The vehicles used have exhaust gas emission controls and are periodically checked and maintained to ensure efficient operation of the vehicles.

During the construction of the auxiliary source SPP, the excavation operations to be carried out were aimed at organizing the land, due to the topographic structure of the area. The ground arrangement process will be carried out at a depth of 0.10 m, and the excess excavation material, other than the topsoil resulting from surface stripping, will be temporarily kept in areas where panel installation will not be carried out within the designated SPP area and will be used in the project area for filling purposes. The resulting topsoil was spread around the turbine at the WPP site and used for landscaping works. Dust emissions and exhaust emissions will occur during excavation, filling and vehicle traffic. For this purpose, work will be carried out in accordance with the Regulation on Control of Industrial Air Pollution during the construction phase. The following emission reduction measures will be taken.

- Reducing the effects of dust (moistening with water sprinklers in dry seasons, etc.)
- Minimizing emissions from vehicles and construction equipment (imposing speed limits, using well-maintained vehicles, etc.)
- Keeping emission measurement stamps for the vehicles used in the project site,
- Minimizing dust by adhering to speed limits within the project area,
- In case of thin material that is at risk of dusting from bulk materials stored in the open, keeping the upper layer moist at least 10%, unloading and filling without blowing,
- Reducing (humidifying) dust formation during ground drilling operations
- Whichever of the national and international air quality standards is lower will be accepted as the limit value.

There are no settlements within the operational area of Mutlu 5 WPP and auxiliary source SPP. The closest settlement centers are Meydanköy Neighborhood Center and Çaltı Neighborhood Center, 3 km away. Since it is more than 500 meters away from residential areas, no emission measurements were made during the construction phase. No complaints were received regarding this issue during construction.

5.5 General Hazardous Material Management Principles

If chemicals are used during the work to be carried out by subcontractors within the scope of their contracts, there must be a chemical material warehouse belonging to the subcontractors. This warehouse will cover the regulatory requirements.

Turkish Material Safety Forms for each chemical substance used will be kept at the construction site and in the facility.

For hazardous chemicals coming to the construction site/facility, the necessary information for the vehicles and drivers specified in the ADR will be checked.

For hazardous wastes to be sent from the construction site/business, the documents specified in the ADR for the licensed vehicle driver and the vehicle will be checked. Forms prepared by HGSA company will be used in the controls.

The general principles regarding the transportation, packaging, storage and working with chemicals or hazardous substances, and general hazardous material management are presented in the sections of the HMMP.

Risks to the health and safety of employees when working with hazardous chemicals are eliminated or minimized by the following precautions;

- Proper arrangement and work organization will be made at the workplace.
- Work with hazardous chemicals will be carried out with a minimum number of employees.
- It will be ensured that the amount of substances to which employees will be exposed and the duration of exposure will be as minimal as possible.
- The amount of chemicals to be used in the workplace will be kept to a minimum.
- The workplace building and its annexes will always be kept tidy and clean.
- Appropriate and sufficient conditions will be provided for the personal hygiene of employees.
- Overloading will be avoided when transporting chemicals.
- Different groups will not be transported together. Chemicals will be transported and stored separately as organic, inorganic, oxidizing, reducing, acid, base and flammables.
- Necessary arrangements will be made for the most appropriate use, transportation and storage of hazardous chemicals, waste and residues in the workplace.
- By applying the substitution method, chemicals that are harmless or less hazardous to the health and safety of employees will be used instead of hazardous chemicals.
- If the substitution method cannot be used due to the nature of the work performed, the risk will be reduced by taking the additional measures according to the result of the risk assessment and in order of priority.

For further information and details such as transportation, packaging, safe storage and management of hazardous materials and wastes, please refer to the HMMP. Moreover, for management of spills and leakages please refer to SERP.

5.6 General Principles on Resource Efficiency and Pollution Prevention

There is no settlement within the Mutlu 5 Hybrid Project area. The closest settlements are Meydanköy District and Çaltı District, 3 km away. While determining the facility units within the scope of the project in question, the distance as air distance from the nearest house in the nearest settlement to the nearest point of the project boundaries was taken into account.

Resource efficiency and pollution prevention are intertwined concepts. It is necessary to use/consume natural resources or other resources produced using natural resources (such as electricity) carefully and efficiently, and to ensure continuity in their natural cycles by preventing the pollution of these natural resources. The general principles in this context are summarized as follows:

- Preventing unnecessary use as much as possible by keeping regular records of resource consumption (water, fuel, electricity, etc.).
- Selecting and using new environmentally friendly technologies that use as little energy and/or water as possible.

- The use of hazardous substances or chemicals (diesel fuel supply, oil change, etc.) should be carried out in sealed areas or, if this is not possible, alternative measures (oil trays, membranes, etc.) should be taken to prevent the chemicals in question from mixing into water or soil.
- Taking the necessary intervention immediately in cases of environmental accidents and providing awareness and intervention training to all employees in this regard; Making relevant notifications to the necessary state bodies depending on the severity of the accident
- Preventing natural habitat elements (flora and fauna) from being negatively affected by these risks by taking the necessary precautions against the risk of increased air pollution and noise levels.
- Taking necessary precautions against surface, groundwater and soil pollution
- Aiming for maximum efficiency with minimum water use by using water resources consciously and efficiently.
- Ensuring that waste is collected, stored, transported and disposed of by licensed companies and facilities in accordance with the waste management hierarchy
- Organizing training and awareness raising activities for employees regarding waste management
- Project designs should be designed and implemented in a way that will cause as little damage to the natural structure as possible.
- Efficient and careful storage and reuse of topsoil and excavation residue
- If necessary, carrying out restoration works of the natural structure such as afforestation.

Details for mitigation measures and related monitoring activities for resource efficiency and pollution prevention are given in Chapter 6 and REPPP.

5.7 General Principles Regarding Biodiversity Conservation

5.7.1 Natural Protected Areas

There are no natural protected areas in the immediate vicinity of Mutlu 5 Hybrid area. The closest protected areas are Tuz Lake at 35 km the northeast and Bozdağ Wildlife Development Area at 29 km the southeast.

5.7.2 Habitat and Biodiversity Management

The Project Site does not correspond to any critical, protected, important or rare feeding, breeding or accommodation habitat under the EU Habitat Directives Annex I, IFC PS6 natural or modified habitat classifications.

None of the species observed in the field are dependent on the habitat within the field, and they use better quality habitats outside the field for feeding, accommodation and reproduction. In addition, although the WPP site is close to the Hodulbaba Mountain KBA, it does not cause any habitat loss in the KBA. On the contrary, it is thought that it may show a "Refuge Effect" for some species due to industrial pressure near the region. In this respect, the WPP site is compatible with the EU Directives under the heading "Habitat Loss".

While it was stated that no flora species with a high level of concern according to IUCN were observed in previous ecosystem and monitoring reports, it was stated that 20 of the species detected were endemic to Türkiye, but they were common in all calcareous steppe habitats and their populations were in good condition.

In order to protect the flora species in question, during the construction phase, the species and their distribution areas will be determined before the topsoil is stripped, their seeds will be collected, and translocation operations will be carried out when necessary.

Photovoltaic solar panels attract insectivorous bird species to the area. Since this situation may increase the impact of solar panels close to the turbines on collision, especially for insectivorous songbird species, carcass scanning, and ornithological monitoring studies will be carried out. Apart from this, although it is said that migrating waterfowl descend on photovoltaic panels, thinking they are bodies of water, there is not enough evidence or incident record on this subject. On the other hand, if such a situation occurs, coatings will be applied to the panels to prevent polarized light pollution.

As a result of the studies carried out to determine the effects of the turbines in the project site, no risk of death as a result of collision was detected for the Gökçe Delice (*Circus cyaneus*) species, which is IUCN category NT. The photovoltaic panels to be installed are not expected to have an impact on the species' niche - according to experts.

There is Kurşunlu Monitoring Area approximately 10 km away from the project. The important and dominant species of the area is *Neophron percnopterus* (Little Vulture). The General Directorate of Nature Conservation and National Parks has requested to monitor the Solar Power Plant area together with WPP in 2022.

The little vulture (*Neophron percnopterus*) in the EN category was observed only in the spring ornithological monitoring studies of 2019, and observations of the species were limited to this period. Since the species has not been observed in any other period since then and does not breed in the region, no special protection measures are deemed necessary for the species. In addition, so far, there has been no case of death due to collision among the target species detected around the turbines, and there is no record of an incident that would require any of the active measures such as "Shut-Down On Demand".

Due to habitat conditions, the presence of the species in the field can be described as coincidental. The possible reason is that the species used to go back and forth between Kurşunlu Mountain and Hodulbaba Mountain to feed, but left this circulation area due to the noise and dust pollution caused by mining facilities etc. in the region and the decrease in habitat areas. In this case, the species may have moved to another region to find a new circulation route by leaving Kurşunlu Mountain, or it may have completely abandoned its habitat.

In line with the request of the General Directorate of Nature Conservation and National Parks during the EIA process, the SPP Project was included within the scope of WPP, whose monitoring process is ongoing and will be monitored in the spring and autumn periods, and the most important project will be carried out in the spring (1 March – 30 May) and autumn (10 August – 15 November) periods. It will be examined for at least 15 days, and the 8th Regional Directorate will be informed at least 10 days before the monitoring studies begin, and observations will be made with the participation of the relevant personnel.

As a result of ongoing observations, a permanent staff (bird observer) has been employed to observe the migrations of the *Neophron percnopterus* (Little vulture) species. The personnel submit their daily monitoring reports, especially during migration periods, to the 8th Regional Directorate. As a result of the monitoring studies, if the *Neophron percnopterus* (Little Vulture) species is observed and risk findings are reached in "extraordinary cases", if the species comes to the WPP/SPP area or its vicinity for feeding, the food resources should be moved regularly from the WPP/SPP site and even away from the WPP/SPP site (out of risk).

All additional measures that may be requested by the administration for both the species and the specific area will be taken, including the establishment of a "Vulture Restaurant" (in a region).

Successional development processes at the bottom and edges of the panels will be monitored, especially during vegetation periods.

For further details and action plan on biodiversity, please refer to the Biodiversity Action Plan (BAP).

5.8 General Principles on Preservation of Cultural Heritage

There is no cultural heritage area in the Mutlu 5 Hybrid project area and its immediate surroundings. Furthermore, no cultural heritage was encountered. There is a Chance Find Procedure and Chance Find Form prepared in case such a situation occurs. The Chance Find Procedure will continue to be used, and employees will be trained in what to do when a chance find is seen during the work.

Legal training is provided in health and safety. In addition, to have a corporate culture on environmental and social issues, environmental training and other security and biodiversity training, ethics training, and cultural heritage training will be added.

During the project activities, IFC Performance Standards will be followed and fulfilled along with the national legislation defined in Chapter 3.

IFC Performance Standard 8: Cultural Heritage defines the requirements for Cultural Heritage. Mutluer Enerji will comply with the requirements of IFC Performance Standard 8 when implementing its policies.

The basic requirements regarding the conservation of cultural heritage are as follows:

- Compliance with applicable laws for the protection of cultural heritage, including the laws of the country where the project is carried out implementing its obligations in the Convention on the Protection of the World Cultural and Natural Heritage. In addition, identifying and protecting cultural heritage using world-wide accepted practices for the preservation, field research and documentation of cultural heritage.
- If the project or project phase poses a serious risk or possible adverse impact to cultural heritage, disclose relevant project information to ensure that affected communities and relevant government organizations understand these risks and possible impacts, as well as proposed prevention and mitigation measures.

5.9 General Principles Regarding Construction Site

In construction site management, measures will be implemented to minimize the health and safety risks of workers as well as environment. Contractors and subcontractors will also comply with these measures and fulfil the plan requirements. The main issues to be addressed in construction site management are as follows:

- Transport
- Electricity
- Emergencies
- First aid and health
- Buildings and other temporary structures
- Water use
- Waste and wastewater management
- Pest control
- Rooms
- Showers and toilets
- Kitchen-dining hall, canteen and laundry room
- Social facilities
- Security
- Internal grievance mechanism

For details for the management of the construction site, please refer to CSMP.

5.10 General Principles of Labor Management

Labor management will

- (i) be based on national labor, social security and occupational health and safety laws,
- (ii) comply with the basic principles and standards contained in international conventions and standards,
- (iii) meet the requirements of the guidelines and standards that determine the basic needs of workers such as food, drink, shelter, etc.

In addition, the implementation of the necessary actions for labor management will be managed within the scope of the project's management plans. As a result of the implementation of these plans, improved OHS performance and a safe working environment will be established. HR Policies will be prepared and implemented by Mutluer Enerji. These will include provisions prohibiting child and forced labor and will also include rights for subcontractor workers. In accordance with labor management, the same standards will be applied to all employees and equal and fair wages, suitable working hours, welfare and social facilities will be provided to an equal labor.

Mutluer Enerji personnel, subcontractor personnel and supplier employees constitute the labor profile. Within the scope of the project, importance is given to local employment. Contracts will be made as fixed-term, indefinite-term, full-time or part-time contracts, depending on the scope and necessity of the work.

Since the work carried out in the project is technical and requires expertise, the workforce consists of certified, trained and expert personnel. Employment periods are determined as the period required by the job and, in some cases, the duration of the Project.

5.11 General Principles of Contractor Management

All Contractors/Suppliers are responsible for full compliance with project standards. In this context, the Project will have a contractor and supplier evaluation mechanism that includes criteria aimed at evaluating the competence of the contractor/supplier and compliance with current Environmental-Social-OHS (ESHS) requirements and workforce practices. Following the selection of the contractor and suppliers, the agreed Scope of Work (SoW) will ensure that the contractor/supplier complies with the Project standards through the terms of the contract.

After the work begins, monthly ESHS reports will be prepared by the Contractor to inform the Project Management about the Project's ESHS performance and workforce problems, and mitigation/corrective activities will be suggested for potential non-compliance situations. Project Management will review these reports and, if necessary, further develop the proposed actions with the relevant contractor. Subsequent reports will also include the performance of the actions taken. When urgent action needs to be taken in case of non-compliance, contractors are responsible for taking the necessary actions in a timely manner and reporting the results to the Project Management.

For further details, please refer to the CMMP.

5.12 General Principles Regarding Supply Chain Management

The following issues will be carefully considered throughout supply chain management:

- Companies whose primary source of income is the Project (e.g. food suppliers/meal preparers, cleaning, etc.) will be subject to review.
- Companies providing skilled or semi-skilled labor will be subject to review for characteristics that do not comply with Project standards, such as forced labor and child labor.

Aspects to consider when choosing a primary supplier:

- Potential suppliers will meet supplier selection requirements before any project-related contracts are awarded.
- Supplier selection procedures will be designed to assess a potential contractor's capacity and commitment to identify and control HSE risks.
- Within the scope of the bid evaluation procedure, the HSE performance of the supervisors assigned to the project will also be evaluated.

In primary supplier selection and evaluation, the supplier's HSE performance will be taken into account. If a decrease in the primary supplier's HSE performance is detected during the study, another supplier who certifies compliance with IFC performance standards will be selected.

For further details, please refer to the SCMP.

5.13 General OHS Principles

The following principles are the essential elements of an effective OHS Management Plan that prioritizes the health, safety, and well-being of workers in the workplace:

- **Risk Assessment and Hazard Identification:** The foundation of any OHS Management Plan is the identification and assessment of workplace hazards and risks. This involves systematically identifying potential sources of harm to workers, evaluating the likelihood and severity of these risks, and prioritizing actions to control or eliminate them.
- **Hierarchy of Controls:** The plan should follow the hierarchy of controls, which prioritizes risk control measures from most to least effective: elimination, substitution, engineering controls, administrative controls, and personal protective equipment (PPE). This ensures that efforts focus on eliminating or minimizing hazards at the source rather than solely relying on PPE.
- **Legal Compliance:** Compliance with relevant occupational health and safety legislation, regulations, and standards is a fundamental principle. The plan should outline how the organization will stay abreast of legal requirements and ensure that its practices and procedures align with them.
- **Management Leadership and Employee Participation:** Effective OHS management requires leadership commitment at all levels of the organization. Management should provide resources, set policies, and demonstrate a commitment to safety. Additionally, meaningful participation of workers in identifying hazards, assessing risks, and developing and implementing control measures is essential for success.
- **Training and Competency:** Providing adequate training and ensuring the competency of workers is crucial for maintaining a safe work environment. The plan should include provisions for initial and ongoing training on safety procedures, hazard recognition, emergency response, and the proper use of equipment.
- **Communication and Consultation:** Open communication channels between management, supervisors, and workers facilitate the exchange of safety-related information. Consultation with workers and their representatives ensures that their perspectives are considered in decision-making processes regarding health and safety matters.
- **Incident Reporting and Investigation:** Establishing clear procedures for reporting incidents, near misses, and hazards allows for timely response and corrective action. Thorough investigation of incidents helps to identify underlying causes and prevent recurrence.
- **Continuous Improvement:** The OHS Management Plan should be dynamic and subject to regular review and improvement. This involves monitoring performance, evaluating the effectiveness of control measures, and implementing corrective actions as needed to address deficiencies and capitalize on opportunities for enhancement.
- **Emergency Preparedness and Response:** Preparing for emergencies such as fires, chemical spills, or medical incidents is essential for safeguarding workers and minimizing harm. The plan should outline emergency response procedures, evacuation plans, communication protocols, and provisions for first aid and medical assistance.
- **Documentation and Recordkeeping:** Maintaining accurate records of risk assessments, training activities, incident reports, and compliance documentation is essential for accountability and demonstrating regulatory compliance. Proper documentation also facilitates learning from past experiences and informs future decision-making.

Please refer to the OHSMP for further details regarding OHS management.

5.14 General Principles of Emergency Preparedness and Response

Effective emergency preparedness and response hinge on clear definitions and categorization of potential emergencies. These encompass fires, explosions, acts of sabotage or terrorism, natural disasters like earthquakes and floods, and industrial accidents. Recognizing and categorizing these events allow for swift identification, enabling the allocation of appropriate resources to control and mitigate the incidents. Consequences of these emergencies can range from severe injuries and fatalities to substantial property damage, environmental pollution, and business interruptions.

A robust emergency alert and alarm system is critical for immediate response. Individuals who witness or are affected by an emergency must promptly inform their supervisors via available communication methods, such as phone or radio. The chain of communication extends to the Management Representative and, if necessary, the Employer. Regular drills, scheduled twice a year, ensure that the alarm systems are effective and that personnel are familiar with evacuation procedures. The designated emergency assembly area, located at the project's front entrance, is clearly marked to facilitate orderly gathering during an emergency.

Communication is a vital component during emergencies, requiring clear and efficient channels. Initial reports should be conveyed through phone or radio to immediate superiors, who then notify the Management Representative. Depending on the incident's scale, external emergency services like ambulances or the fire department may be contacted. The plan includes an extensive list of emergency contact numbers to ensure quick coordination with external agencies, reinforcing the communication network's reliability during crises.

Incident response methods emphasize prevention and preparedness. The project site is equipped with CO₂ portable fire extinguishers, adhering to national standards. Regular training and drills for employees focus on firefighting, first aid, and spill response, ensuring they are well-prepared for potential emergencies. These practices not only test the response plan's effectiveness but also highlight areas for improvement, ensuring continuous enhancement of the emergency preparedness and response strategy.

For further project specific details, please refer to the EPRP.

5.15 General Principles on Community Health and Safety

Community Health and Safety (CHS) is concerned with many environmental, health-safety and social impacts and risks. These may include:

- *Environmental issues* such as waste management, chemical/hazardous material management, water use and wastewater management, noise and air quality,
- *Health and safety issues* such as traffic safety, security, emergencies and natural disaster management, infectious and/or epidemic diseases such as Covid-19,
- *Social issues* such as social conflict/cultural differences, visual impacts, gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH).

Incomplete or poor management of the above-mentioned issues in a project area threatens the health and safety of both workers working in the project area and community members in nearby settlements.

Details and mitigation measures regarding the above-mentioned risks and impacts are given in the relevant chapters of the CHSMP, please refer to, if necessary.

5.16 General Principles of Traffic Management

Effective traffic management is built upon several foundational principles aimed at ensuring safety, minimizing environmental impacts, and maintaining efficient transportation systems. Firstly, understanding the sources and impacts of traffic is crucial. This involves identifying various types of vehicles and their movements, including company and contractor vehicles, heavy construction vehicles, supplier trucks, waste transporters, and pedestrians. Each category must be managed to prevent congestion, accidents, and disruptions.

Mitigating environmental and health impacts is a key principle. Traffic management must address the potential for noise pollution, exhaust emissions, and hazardous spills that can contaminate air, water, and soil. Additionally, it should incorporate measures to reduce the risk of traffic-related accidents, which can result in injuries, fatalities, and property damage. Implementing strict controls and rapid response protocols helps in minimizing these adverse effects.

Ensuring road safety is another fundamental principle. This involves conducting thorough road surveys to identify potential hazards such as rough terrain, sharp bends, and poor visibility. Necessary modifications and safety measures, such as improved signage, road markings, and the use of escort vehicles for large transports, are essential to ensure the safe passage of all vehicles. Regular maintenance of road infrastructure also plays a vital role in maintaining safety standards.

The utilization of appropriate traffic signage and safety equipment is critical. Clear and visible traffic signs, reflective vests, traffic cones, and blinkers are necessary to guide and warn road users effectively. Continuous training and education for drivers and operators on safety practices, combined with regular checks and updates of safety equipment, ensure that traffic management systems remain robust and effective. By adhering to these general principles, traffic management can achieve a safe, efficient, and environmentally responsible transportation system.

For further project specific details regarding the traffic management, please refer to the TMP.

5.17 General Principles on Gender Based Violence, Sexual Exploitation and Abuse / Sexual Harassment

Gender-Based Violence (GBV) and Abuse Prevention Plan has been prepared. In this context, it is discussed in this plan that exploitation, abuse and harassment are a form of discrimination arising from gender inequality, among other reasons, and are a frequently encountered phenomenon in all areas of social life, albeit in different forms and levels. In addition, it is clearly stated in the prepared plan that sexual exploitation and abuse/sexual harassment (SEA/SH) constitute a crime because it is a violation of rights that can negatively affect its victims in many ways.

SEA/SH in the workplace negatively affects people's working and educational lives in many ways and levels. In institutional environments where hierarchical relations prevail, SEA/SH is often made invisible due to the difficulties experienced by those who are harassed in expressing it, and both the person and the institutional environment are harmed by this situation. Although it is clear that it is mostly committed as a form of discrimination against women, some people are also affected by harassment due to sexual orientation and gender identity. How possible cases of GBV and SEA/SH will be handled in the Project and the procedures to be followed are explained within the Plan.

5.18 General Principles on Project Security

Within the scope of project security, there are 4 security personnel. These personnel are Mutluer Enerji's own insured personnel and an employment contract of indefinite duration has been made between them and Mutluer Enerji. Security personnel are unarmed and have Security Personnel Certificates.

A total of 2 security personnel work per day, 1 person in the morning shift and 1 person in the evening shift. Employees work 4 days and have 4 days off during their shifts. During the 4 days that the first group is off, 2 security personnel from the other group work.

Security personnel are paid overtime and receive annual leave, which is their legal right.

Possible sabotage, raid, etc. In such cases, they will contact the nearest Gendarmerie. In this context, the authority to intervene in emergency situations belongs to law enforcement forces.

5.19 General Principles regarding the Stakeholder Engagement and Grievance Mechanism

5.19.1 Stakeholder Engagement

Stakeholder participation is essential to establish the strong, constructive and sensitive relationships necessary to successfully manage the environmental and social impacts of a project. Stakeholder engagement is a continuous process. Stakeholder engagement, although varying in degree, consists of analyzing and planning stakeholders, informing stakeholders, providing consultation and participation, establishing a grievance mechanism, and providing ongoing reporting to Affected Communities.

Since there is no transportation road passing through the settlements, no significant negative impact is expected on the stakeholders in the immediate vicinity.

There are no settlements within the Mutlu 5 Hybrid project area. Nearest settlements are Meydanköy Neighborhood Center and Çaltı Neighborhood Center.

During the Mutlu SPP EIA process, a public information meeting was held in Çaltı neighborhood. Before the meeting, announcements regarding the meeting were published in two separate newspapers, published nationally on 30.06.2021 and locally published on 30.06.2021. The meeting place announcement text, approved by the Provincial Directorate of Environment and Urbanization, was sent in an official letter to interest groups such as village mukhtars' offices, and was announced to the public by being hung on the mukhtars' bulletin boards after consultation with the local people.

Similarly, during the EIA processes carried out within the scope of the Capacity Increase Project, a Public Information and Process Participation Meeting was held in Konya, where the project is located, in order to inform the public who may be affected by the project and to receive their opinions and suggestions regarding the project.

The meeting was held at the village mansion in Selçuklu District Çaltı Village on 28.03.2023, with the approval of the Konya Provincial Directorate of Environment, Urbanization and Climate Change. Before the meeting, announcements regarding the meeting were published in 2 different national and local newspapers dated 17.03.2023. In addition to the announcements, announcement texts approved by the provincial directorate were sent as official letters to relevant groups such as village mukhtars' offices and were hung on the mukhtars' notice boards.

The meeting started with the opening speech of the Provincial Directorate officials, and stakeholders were informed about the project with the presentation made by the representative of the environmental consultancy firm. Within the scope of the presentation the following issues are informed:

- The importance of the project for the country and local economy,
- Social and environmental impacts of the project and measures to be taken,
- Information about the work done during the process and the work to be done in the future,
- Employment opportunities,
- Information was given on land acquisition etc.

There is a Stakeholder Engagement Plan (SEP) prepared for the Mutlu 5 WPP project. During the EIA process, the SEP was updated to include the capacity increase project. The SEP will be implemented in accordance with the characteristics and interests of the affected communities, taking into account the risks, impacts and development stage of the project.

Sharing project-related information helps affected communities and other stakeholders understand the risks, impacts and opportunities of the project. Affected Communities will be provided access to information regarding the purpose, nature and scale of the project, the duration of the proposed project activities, the risks it will pose to the communities in question, its potential impacts and relevant mitigation measures, the envisaged stakeholder participation process and the grievance mechanism.

In addition, within the scope of Gold Standard studies, project and contact information were left to the mukhtars' offices.

In order to inform the communities, a Project Information Brochure will be prepared and distributed to the affected communities and will be kept ready next to the complaint boxes. Mutluer Enerji's website will also be used to share project information.

5.19.2 Consultations with Affected Communities

When Affected Communities are exposed to the risks and adverse impacts identified in the project, a consultation process should be carried out that allows the affected communities to express their views on the risks, impacts and mitigation measures in the project, and the company to evaluate and respond to these views. The scope and extent of participation required for the consultation process should be proportionate to the project's risks, adverse impacts and concerns expressed by affected communities. An effective consultation process should occur early in the process of identifying environmental and social risks and impacts and continue as risks and impacts occur, and should be based on previous exchanges and transparent, objective, meaningful, easily accessible information in a culturally appropriate local language or languages and in a format understandable by affected communities. Inclusive participation should focus on those directly affected rather than those indirectly affected, should not involve external manipulation, intervention, coercion or intimidation, should enable meaningful participation, where appropriate, and should be recorded. A consultation process will be conducted based on the needs of the affected communities.

Within the scope of the public information meeting and Gold Standard studies held during the EIA process, project and contact information were provided to the mukhtars' offices. Stakeholder meetings will be held regularly throughout the operation with the stakeholders identified in the revised SEP. In addition, complaint boxes and notification forms will be placed in nearby settlements and public opinions and suggestions will be received.

5.19.3 Grievance Mechanism

Any issues related to project activities need to be resolved or mitigated immediately to avoid unnecessary tension and conflict.

The main purpose of the grievance mechanism is to ensure that complaints/suggestions/requests submitted by project stakeholders are responded to in a timely and appropriate manner.

In accordance with IFC Environmental and Social Sustainability Performance Standards; Where there are affected communities, a grievance mechanism should be established by the customer to receive and facilitate resolution of concerns and complaints from affected communities regarding the customer's environmental and social performance.

It will be carried out within the scope of the Grievance Mechanism, including recording the complaints received in the follow-up list and resolving them within the specified time limits.

Complaint boxes will be placed in places where employees can easily reach them, and forms will be available in the complaint boxes. Complaint boxes will be checked routinely by a person authorized to open complaint boxes. Employees will be informed if the complaint is resolved or the reasons why it cannot be resolved. All complaints will be recorded, and each complaint will be recorded in the monitoring table.

Complaint notification forms will be kept in the complaint boxes to be placed in nearby settlements, and the complaint boxes will be checked monthly by a person authorized to open the complaint boxes. Mutluer Enerji will inform local people about the grievance mechanism.

The grievance mechanism will remain active throughout the life cycle of the project.

Visuals of the complaint boxes placed in Çaltı District and Meydanköy District are given below.



Figure 5-1. Complaint Box Placed in Çaltı Neighborhood



Figure 5-2. Complaint Box Placed in Meydanköy Neighborhood

6. MITIGATION MEASURES AND MONITORING ACTIVITIES

Project specific mitigation measures and monitoring activities are summarized in Table 6-1 below.

Table 6-1. Mitigation Measures and Monitoring Activities

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
Waste Management (WM)	<ul style="list-style-type: none"> Wastes will be collected and stored in separate, color-coded waste containers will be used for distinguishing different types of waste. Temporary Waste Storage Area will be designated. Temporary Waste Storage Area will have the physical features given in Waste and Wastewater Management Plan. Emergency precautions regarding fire/explosion risks and environmental incident risks such as spills or leakage. Waste and Wastewater Management Plan will be implemented. 	National legislation (Table 3-1) IFC PS1 & PS3	Existence of adequate and defined containers for waste separation	Visual inspection	Monthly during construction and operation	HSE Responsible Environmental Consultant Temporary Waste Storage Area Responsible
			Existence of a defined and standard-compliant waste area for hazardous and non-hazardous wastes	Visual inspection	Monthly during construction and operation	
WM	<ul style="list-style-type: none"> Oil changes of the vehicle will not be performed at the Project site. It will be performed in authorized services regularly. Spill response kits will be placed in waste storage areas, chemical storage areas and near the construction sites for fast intervention. 	National legislation (Table 3-1) IFC PS1 & PS3	Vehicle oil changes in services	Documentation control (service records)	Twice in a year during construction and operation	
			Presence of spill response kits in waste storage areas and chemical storage areas	Visual inspection	Monthly during construction and operation	

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
WM	<ul style="list-style-type: none"> All types of waste generated will be recorded with their amounts. The waste records will be notified through IEIS. All wastes will be transported, recycled, recovered or disposed of by the licensed companies/facilities. Necessary contracts, agreements or protocols will be signed with the licensed companies/facilities. Waste and Wastewater Management Plan will be implemented. 	National legislation (Table 3-1) IFC PS1 & PS3	Recording hazardous and non-hazardous waste amounts in IEIS-TABS (Waste Declarations)	Documentation control / Online control	Between January and March in every year for the previous year during operation	
WM	<ul style="list-style-type: none"> The awareness of the workers regarding the waste management and its importance will be raised. Training on waste management will be given to all Project employees including contractors and subcontractors. 	National legislation (Table 3-1) IFC PS1 & PS3	Providing training to employees about waste management	Documentation control (training records, participant list, materials, etc.)	Quarterly during construction and operation and as needed	
Water Use	<ul style="list-style-type: none"> Records of the amount of drinking water and utility water will be kept. Regular cleaning and maintenance of the utility water tank and its network will be performed and recorded. The utility water in the tank and in the system will be analyzed regularly 	National legislation (Table 3-1) IFC PS1 & PS3	Regular maintenance and cleaning of the utility water tank and ensuring its sterilization	Documentation control (maintenance and cleaning records) Visual inspection for any unusual change in the water tank	Twice a year during operation, and as needed	Site Chief HSE Responsible Environmental Consultant

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>for the compliance of national and international limit values for human health.</p> <ul style="list-style-type: none"> Necessary sterilization or disinfection methods will be implemented to the water network. Waste and Wastewater Management Plan will be implemented. 		Validity of utility water analysis	Documentation control (analysis report)	Quarterly / four times a year during operation, and as needed	Construction Contractor and subcontractors
Wastewater Management	<ul style="list-style-type: none"> Domestic wastewater due to the employees will be collected in the impermeable septic tank. The septic tank will be vacuumed regularly (at the level of 70%) by the licensed vacuum trucks belonging the Selçuklu Municipality for proper treatment. Records regarding the vacuuming of the septic tank will be kept. Regular inspections will be performed regarding the impermeability of the septic tank in case of leakage. Impermeability test will be performed if any suspicion of leakage. Waste and Wastewater Management Plan will be implemented. 	National legislation (Table 3-1) IFC PS1 & PS3	Presence of a sealed septic tank for domestic wastewater	Visual inspection and control of impermeability test	Once the sealed septic tank is constructed	
			Domestic wastewater sewage truck records	Documentation control (sewage truck records, bills, etc.)	Monthly during construction and operation	
Resource Efficiency	<ul style="list-style-type: none"> The amount of water, electricity and fuel used by employees will be monitored regularly, consumption 	National legislation (Table 3-1)	Natural resource consumption records	Documentation control (natural resource	Monthly during construction and operation	Site Chief/ Operation Manager

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>amounts will be checked regularly and early intervention will be possible in case of any leakage/loss. Improvement works will be planned and implemented to minimize consumption and losses.</p> <ul style="list-style-type: none"> • Water leaks and leaks will be eliminated as soon as possible and water usage will be kept at an optimum level. • Generators will be maintained regularly and appropriate fuel will be used. Regular maintenance of fuel tanks will be carried out in order to prevent leaks that may cause both resource loss and environmental pollution. • Photocell lighting and sink mixers will be used in appropriate areas, minimizing the amount of electricity used in the facility. • Malfunction and maintenance records of vehicles, machinery and equipment will be kept regularly. • The engines of vehicles and equipment will not be left running when not in use. • The hazardous materials in question to be used for maintenance-repair activities will be stored in accordance with the "Regulation on 	IFC PS1 & PS3		consumption records)		<p>HSE Responsible</p> <p>Environmental Manager/ Responsible of the Contractor</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>Health and Safety Precautions in Working with Chemical Substances", which came into force after being published in the Official Gazette dated 12.08.2013 and numbered 28733, and necessary precautions will be taken against spillage and leakage;</p> <ul style="list-style-type: none"> • Unnecessary lighting will be avoided and LED lighting will be used. • Unnecessary paper and printer use will be prevented. • Care will be taken not to use disposable, non-recyclable packaged materials. • The recycling rate will be increased by separating the wastes originating from the business on site. • Employees will be informed and encouraged by providing training on the main goals of resource management and consumption reduction. • In training, own resources and examples will be used as much as possible. Apart from this, on-the-job toolbox training will also be provided. • Trainings will be recorded with the Training Registration form. 					

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Natural resource consumption will be monitored every month. Natural resource consumption and electricity production registration form, the example of which is given in Appendix 1, will be used. Following these records, targets for reducing natural resource consumption will be determined every year. 					
Diesel Supply, Vehicle Washing and Traffic	<ul style="list-style-type: none"> Vehicle/work machine/transformer maintenance will be carried out regularly to prevent oil leaks, Leak response kits will be available in the facility, Fuel filling and lubrication of vehicles and oil changes will be done on drip pans or impermeable floors, It is forbidden to wash vehicles inside the project area. Trained personnel will respond to diesel/oil leaks and spills, Oil will not be changed on site. However, in case of oil change in fixed machines such as generators and turbines, necessary leakage-spill precautions will be taken. 	National legislation (Table 3-1) IFC PS1 & PS3	Vehicle/work machine maintenance records Leakage/spill records Spill kit checks Training records regarding spill intervention	Visual observation Documentation control	Quarterly during construction and operation	Site Chief/ Operation Manager HSE Responsible Environmental Manager/ Responsible of the Contractor
Working Near Surface and Groundwater	<ul style="list-style-type: none"> Preventing oil leaks by performing vehicle maintenance regularly, 	National legislation (Table 3-1)	Vehicle/work machine maintenance records	Visual observation Documentation control	Monthly during construction and operation	Site Chief/ Operation Manager

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Providing leak response kits that can intervene in vehicles leaking oil and diesel, Washing vehicles in designated areas with a grease trap at the end of the drainage system, Cleaning up debris on the roads Being prepared for diesel-oil leaks and spills, forming response teams, Controlling possible pollution resulting from concrete works to be carried out near water resources 	IFC PS1 & PS3	Leakage/spill records Spill kit checks Training records regarding spill intervention			HSE Responsible Environmental Manager/ Responsible of the Contractor
Air Quality	<ul style="list-style-type: none"> Reducing the effects of dust (moistening with water sprinklers in dry seasons, etc.) Minimizing emissions from vehicles and construction equipment (imposing speed limits, using well-maintained vehicles, etc.) Keeping emission measurement stamps for the vehicles used in the project site, To minimize dust by adhering to speed limits within the project area, In case of thin material that is at risk of dusting from bulk materials stored openly, keeping the upper layer moist at least 10%, unloading and filling without blowing, 	National legislation (Table 3-1) IFC PS1 & PS3	Water sprinkler records Exhaust emission inspection records of vehicles and machines Grievance records Air quality measurement results	Visual observation Documentation control	Monthly during construction and operation	Site Chief/ Operation Manager HSE Responsible Environmental Manager/ Responsible of the Contractor

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Reducing (humidifying) dust formation during ground drilling operations If a grievance is received regarding air quality, ambient air quality measurements will be performed and necessary additional measures will be taken, accordingly. 					
Environmental Noise	<ul style="list-style-type: none"> Machines will be shut down when in standby and not in operation. Periodic maintenance of vehicles and equipment will be carried out. Turbines will be maintained regularly. If a grievance is received regarding noise, environmental noise measurements will be performed and necessary additional measures will be taken, accordingly. 	National legislation (Table 3-1) IFC PS1 & PS3	Periodic maintenance records of vehicles and machines Grievance records Environmental noise measurement results	Visual observation Documentation control	Monthly during construction and operation	Site Chief/ Operation Manager HSE Responsible Environmental Manager/ Responsible of the Contractor
Hazardous Material Management and Leak/Spill Prevention and Control	<ul style="list-style-type: none"> Appropriate chemical storage will be provided for the chemicals used for maintenance in the facility. Current Material Safety Forms of the chemicals used will be posted in relevant places. Appropriate Personal Protective Equipment was delivered to the employees and they were ensured to be used. 	National legislation (Table 3-1) IFC PS1 & PS3	Leakage/spill records Spill kit checks Training records regarding spill intervention MSDS records	Visual observation Documentation control	Monthly during construction and operation	Site Chief/ Operation Manager HSE Responsible Environmental Manager/ Responsible of the Contractor

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Leak and spill response equipment will be provided for possible leaks and spills. Leak/spill intervention training will be provided to working personnel. Action will be taken in accordance with the leakage-spill response plan given in the annex of the ESMP. Leakage-spill prevention measures will be taken for the wastes that will be generated in the facility and the liquid chemicals to be used. A leak-spill team will be established. Leak-spill response equipment will be available in the temporary waste storage area. Leak-spill kits will also be available in the maintenance vehicles to be used in the operation. 					
Management of Topsoil and Excavation Residue Material	<ul style="list-style-type: none"> During the pre-construction surface stripping process, the vegetal soil will first be scraped and stored in a suitable place in the project area to be protected. At the end of the work, it will be used again for landscaping purposes. The material obtained after excavation and drilling will be used for filling purposes in the field as much as possible, and the unused 	National legislation (Table 3-1) IFC PS1 & PS3	<p>Records regarding the excavation materials sent to dump site</p> <p>Records of excavation material reused and stored at the site</p>	<p>Visual observation</p> <p>Documentation control</p>	Monthly during construction	<p>Site Chief/ Operation Manager</p> <p>HSE Responsible</p> <p>Environmental Manager/ Responsible of the Contractor</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>parts will be transported to licensed casting areas.</p> <ul style="list-style-type: none"> • A record of the materials transported to the excavation dump site will be kept. • During construction, the Regulation on the Control of Excavation Soil, Construction and Demolition Waste will be followed. 					
Transport	<ul style="list-style-type: none"> • Necessary measures will be taken to prevent and control accidents that may arise from traffic. • A TMP has been prepared to explain how vehicle and equipment traffic will be regulated on roads and work areas and how traffic management will be operated. • Safe and easy access will be provided for emergency vehicles. • Regarding traffic management, the conditions of the TMP will be complied with. • All necessary traffic warning signs will be placed within the work areas. • All staff will receive training on traffic management. • Accident records will be recorded regularly. After the accident, root cause analysis will be performed and records will be kept. 	<p>National legislation (Table 3-1)</p> <p>IFC PS1 & PS2</p> <p>Project TMP</p>	<p>Presence of traffic signs and warnings</p> <p>Employees provided with the traffic training</p> <p>Traffic accident records</p>	<p>Visual observation</p> <p>Documentation check</p>	<p>Monthly during construction and operation</p>	<p>Site Chief / Operations Manager</p> <p>HSE Responsible</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
Electricity	<ul style="list-style-type: none"> All electrical connections and equipment will be properly grounded and residual current relays will be installed. Regular checks of electrical devices and equipment will be made at intervals in accordance with the legislation. The use of heating and cooking devices will be prohibited on the entire construction site and unannounced controls will be carried out. Fire extinguishers suitable for electrical fires will be placed in appropriate locations. Electrical and grounding checks will be made and reports will be received. 	<p>National legislation (Table 3-1)</p> <p>IFC PS1 & PS2</p>	<p>Periodic controls of electrical devices and equipment</p> <p>Electrical and grounding check reports</p>	<p>Visual observation</p> <p>Documentation check</p>	<p>Annual during construction and operation</p>	<p>Site Chief / Operations Manager</p> <p>HSE Responsible</p>
Emergencies	<ul style="list-style-type: none"> Emergency exit routes will be identified and clearly marked. These roads will always be clean and open. Emergency meeting areas will be determined and announced to workers through drills. EPRP will be implemented. Drills will be held and recorded at intervals specified in the legislation. Fire extinguishers of the appropriate type and number will be placed in 	<p>National legislation (Table 3-1)</p> <p>IFC PS1 & PS2</p> <p>Project EPRP</p>	<p>Drill records</p> <p>Fire extinguishers check records</p>	<p>Visual observation</p> <p>Documentation check</p>	<p>Annual during construction and operation</p>	<p>Site Chief / Operations Manager</p> <p>HSE Responsible</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>appropriate places. Fire extinguishers will be checked and refilled periodically.</p> <ul style="list-style-type: none"> Smoking points will be determined on the construction site, and smoking will be prohibited in the construction site, except for these points. Measures will be taken to prevent fire in the waste storage area and chemical storage area. 					
First aid and health	<ul style="list-style-type: none"> There will be first aid points and necessary equipment at the construction site. According to the number of employees, the minimum legal number of people will receive First Aid training and certificates. An occupational physician will be appointed within the legal period. Employees will have health checks and tests within legal periods. Workers will be assigned according to their health conditions. Personnel who will work at heights and at night will not be allowed to work unless health reports are issued stating that they do not have any health problems that would prevent them from carrying out these works. 	<p>National legislation (Table 3-1)</p> <p>IFC PS1 & PS2</p> <p>Project EPRP and OHSMP</p>	<p>First aid kit checks</p> <p>Number of first aiders</p> <p>Health examinations of the workers</p> <p>Basic health and first aid training to all employees</p>	<p>Visual observation</p> <p>Documentation check</p>	<p>Annual during construction and operation</p>	<p>Site Chief / Operations Manager</p> <p>HSE Responsible</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> In case of possible accidents and injuries, the routes to the nearest hospital and the assigned vehicle and driver information will be announced to the workers on the notice boards. First aid equipment will be checked at routine intervals. If there is an infirmary, there will be medical waste bins in the infirmary and first aid rooms and the waste will be disposed of appropriately. Basic health and first aid training will be provided to employees. 					
Buildings and other temporary structures	<ul style="list-style-type: none"> Geological and climatic conditions will be taken into account in the placement of all buildings and prefabricated structures. Buildings and prefabricated structures will be selected and designed to be robust enough not to require major repairs or reconstruction. Floors will be non-slip and easy to clean. Appropriate lighting and infrastructure system will be provided. 	National legislation (Table 3-1) IFC PS1 & PS2	Occupational Hygiene measurements	Visual observation Documentation check	Annual during construction and operation	Site Chief / Operations Manager HSE Responsible
Water use	<ul style="list-style-type: none"> During the construction phase, drinking water will be purchased from the market and provided with 	National legislation (Table 3-1)	Water analysis reports	Documentation check	Annual during construction and operation	Site Chief / Operations Manager

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>demijohns, as is the current situation.</p> <ul style="list-style-type: none"> • Within the scope of the project, the provisions of the "Regulation on Water for Human Consumption", which came into force after being published in the Official Gazette dated 17.02.2005 and numbered 25730, will be complied with regarding the drinking water of the personnel. • Chemical, physical and microbiological analyzes will be performed periodically. 	IFC PS1, PS2 & PS3			and as needed	HSE Responsible
Waste and wastewater management	<ul style="list-style-type: none"> • There is a sealed septic tank in the area. It is emptied with the Selçuklu Municipality sewer truck and a receipt is obtained. • WWMP will be implemented. • Waste will be separated and sent to licensed facilities. • Packaging waste will be separated and delivered to the company that collects this waste. • Hazardous wastes will be delivered to licensed facilities by licensed vehicles. 	<p>National legislation (Table 3-1)</p> <p>IFC PS1, PS2 & PS3</p>	<p>Sewer truck receipts</p> <p>Waste register forms</p>	<p>Visual observation</p> <p>Documentation check</p>	Monthly during construction and operation	<p>Site Chief / Operations Manager</p> <p>HSE Responsible</p>
Pest control	<ul style="list-style-type: none"> • Within the scope of pest control, an agreement will be made with an authorized company and the 	National legislation (Table 3-1)	<p>Pest control records</p> <p>Disinfectant ingredients checks</p>	<p>Visual observation</p> <p>Documentation check</p>	Quarterly during construction and operation	Site Chief / Operations Manager

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	necessary practices will be carried out in the field. <ul style="list-style-type: none"> • A person or persons will be assigned to perform visual control for pests at the project site. • Disinfectant ingredients will be checked in advance and those that are not harmful to human and environmental health will be selected. • Disinfestation will be carried out periodically by certified companies. 	IFC PS1, PS2, PS3 & PS6			and as needed	HSE Responsible
Rooms	<ul style="list-style-type: none"> • There is no accommodation on the construction site. Houses have been rented in nearby settlements to workers coming from outside the region. • The following conditions will be met in the rooms where workers will stay. <ul style="list-style-type: none"> ○ The sufficient air volume in the bedroom will be 12 m³. ○ The rooms will have appropriate ventilation, the floor will be made of non-slip and easy-to-clean materials. ○ The rooms will have technical equipment such as internet, network connection, adequate lighting, heating, etc. 	National legislation (Table 3-1) IFC PS1 & PS2	Room checks, if necessary	Visual observation	Once before the renting, then as needed	Site Chief / Operations Manager HSE Responsible

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> ○ There will be sufficient shower and toilet facilities in the accommodation. ○ A shoe rack will be provided. ○ Emergency exit routes will be visibly marked, there will be no obstacles on these routes, there will be emergency lighting, and there will be a sufficient number of fire extinguishers of the correct quality. ○ It is strictly forbidden to use tea, coffee makers and stoves in bedrooms. ● There will be name tags on the bedroom doors with the names of the people staying in the room. 					
Showers and toilets	<ul style="list-style-type: none"> ● Separate toilets will be provided for male and female employees. ● All toilets and showers will be made of non-slip floors and easy-to-clean materials. ● Toilets and sinks will be provided in sufficient numbers according to the number of people and equipped with appropriate cleaning materials, as described below; <ul style="list-style-type: none"> ○ One toilet for 15 people ○ One urinal for 15 people ○ One sink for 15 people 	National legislation (Table 3-1) IFC PS1 & PS2	Cleaning control forms for toilets and showers	Visual observation Documentation check	Monthly during construction and operation and as needed	Site Chief / Operations Manager HSE Responsible

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Toilets will be easily accessible and have doors, walls, curtains, etc. to ensure personal privacy. will be provided. Toilet and shower areas will be cleaned every day and the cleaning will be recorded through cleaning control forms. 					
Kitchen – dining hall, canteen and laundry room	<ul style="list-style-type: none"> Food will not be cooked anywhere other than the kitchen. Kitchen, laundry room and food preparation counters will be chosen with easy-to-clean and non-slip floors. Lighting will be ex-proof (explosion protected) and natural light will be selected. The laundry room will consist of a sufficient number of washing machines and dryers. In case of a canteen, there will be 1-1.5 meters of floor space per person in the canteen. There will be sinks with water, soap, disinfectant and paper towels at the entrance of the dining hall. Kitchen equipment will be independent pieces that can be moved for cleaning. 	National legislation (Table 3-1) IFC PS1 & PS2	Compliance to the standards	Visual observation	Monthly during construction and operation and as needed	Site Chief / Operations Manager HSE Responsible

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Floors, ceilings and lighting will consist of cleanable surfaces. There will be waste containers in sufficient numbers and in appropriate places in the dining hall and kitchen. Closed waste containers will be kept outside the buildings. Collected waste will be stored in the central waste collection area and sent to appropriately licensed facilities. Calories have been calculated by the Food Engineer and monthly menus will be announced to the workers on the notice boards. If food is cooked on site, witness samples will be taken from the prepared meals and kept in the refrigerator for 72 hours. If ready meals are purchased from outside, the catering company's manufacturing site and hygiene controls will be inspected. 					
Social facilities	<ul style="list-style-type: none"> There will be sufficient and suitable rest areas on the construction site with internet access. Wireless use will be provided in locations where telephone reception is not available on the construction site. 	National legislation (Table 3-1) IFC PS1 & PS2	Compliance to the standards	Visual observation	Monthly during construction and operation and as needed	Site Chief / Operations Manager HSE Responsible

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> • Appropriate places will be provided for workers to fulfill their religious obligations. • Smoking areas will be created. • Alcohol consumption is prohibited on the construction site. 					
Security	<ul style="list-style-type: none"> • Security planning will be made for the construction phase of the project. • Within the scope of this planning, possible theft, sabotage, etc. Security risks will be evaluated and measures to be taken will be determined. • A procedure will be prepared to determine the entry and exit controls and practices of visitors to the construction site. Visitor Instructions have been prepared for visitors. • Competent and sufficient number of security personnel will be assigned. • Security planning will also include local population and community safety measures. • Within the scope of security planning, the following issues will be clearly determined; <ul style="list-style-type: none"> ○ Number of security personnel ○ Number of shifts ○ Armed or unarmed security personnel 	<p>National legislation (Table 3-1)</p> <p>IFC PS1, PS2 & PS4</p>	<p>Security plan</p> <p>Visitor records</p> <p>Certificate and training status of security personnel</p>	<p>Visual observation</p> <p>Documentation check</p>	<p>Quarterly during construction and operation</p> <p>and as needed</p>	<p>Site Chief / Operations Manager</p> <p>HSE Responsible</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> ○ Certificate and training status of security personnel ● Security personnel's intervention authority and limit 					
Internal grievance mechanism (GM)	<ul style="list-style-type: none"> ● Grievance boxes and Employee Grievances and Suggestion Forms will be placed in appropriate places on the construction site to receive employee complaints. ● Grievance boxes will be locked so that they cannot be opened except by an authorized person. ● Employee grievances will be evaluated, recorded and closed within the framework of the established GM. 	<p>National legislation (Table 3-1)</p> <p>IFC PS1 & PS2</p>	Number of grievances received from workers	Grievance records	Monthly during construction and operation	<p>Site Chief / Operations Manager</p> <p>HSE Responsible</p>
Hazardous and Nonhazardous Waste Management	<ul style="list-style-type: none"> ● Wastes will be collected and stored in separate, color-coded waste containers will be used for distinguishing different types of waste. ● Temporary Waste Storage Area will be designated. ● Temporary Waste Storage Area will have the physical features explained in Waste and Wastewater Management Plan. ● Emergency precautions regarding fire/explosion risks and environmental incident risks such as spills or leakage. 	<p>National legislation</p> <p>IFC PS1 & PS3</p>	Existence of adequate and defined containers for waste separation	Visual inspection	Monthly during construction and operation	<p>Operations Manager or Site Chief</p> <p>HSE Responsible</p>
			Existence of a defined and standard-compliant waste area for hazardous and non-hazardous wastes	Visual inspection	Monthly during construction and operation	<p>Construction Contractor and subcontractors</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
Hazardous Waste	<ul style="list-style-type: none"> Oil changes of the vehicle will not be performed at the Project site. It will be performed in authorized services regularly. Spill response kits will be placed in waste storage areas, chemical storage areas and near the construction sites for fast intervention. The Spill Emergency Response Procedure (SERP) will be implemented. 	National legislation IFC PS1 & PS3	Vehicle oil changes in services	Documentation control (service records)	Twice in a year during construction and operation	
			Presence of spill response kits in waste storage areas and chemical storage areas	Visual inspection	Monthly during construction and operation	
Evaluation and selection of Hazardous Materials	<ul style="list-style-type: none"> All hazardous substances will be evaluated according to legal regulations. These evaluations will be made by suitably qualified personnel and a joint decision should be made. General and substance-specific handling principles given within this HMMP will be implemented. 	National legislation (Table 3-1) IFC PS1, PS2, PS3 and PS4	Chemical and Hazardous material evaluation and purchasing records	Documentation check	Quarterly during construction and operation	HSE Responsible Purchasing department Contractors and Suppliers
Inventory of the hazardous materials	<ul style="list-style-type: none"> Turkish and English Safety Data Sheets (MSDS) will be provided for all hazardous materials, and these will be located in storage areas and points of use. An inventory form for the hazardous materials will be kept indicating features, amounts, type and location of the hazardous material. 	National legislation (Table 3-1) IFC PS1, PS2, PS3 and PS4	MSDS records Hazardous Materials Inventory Form	Documentation check	Quarterly during construction and operation	HSE Responsible Contractors and Suppliers

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> General and substance-specific handling principles given within this HMMP will be implemented. 					
Storage of the Hazardous Materials	<ul style="list-style-type: none"> Storage of liquid hazardous substances, including waste oil and solvents, will be provided with secondary containments with a volume of 10% of the total volume of the liquid. Waste oils will not be stored underground for a long time. Tanks and reservoirs will be visually inspected by emptying and refilling regularly every day to detect any signs of cracks or holes. If any damage is detected in the tanks, the repair work will be recorded. Spill kits, protective equipment and other necessary equipment will be available at the Construction Site/Project area to clean up spills and reduce their effects where hazardous substances are used. Appropriate first aid equipment, such as eyewash, showers and first aid kits, will be located near hazardous material storage areas. General and substance-specific handling principles given within this HMMP will be implemented. The SERP will be implemented. 	National legislation (Table 3-1) IFC PS1, PS2, PS3 and PS4	Repair records Spill kit records First aid kit records	Documentation check Visual observation	Quarterly during construction and operation And as needed	HSE Responsible Warehouse responsible Contractors and Suppliers

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
Transportation of hazardous materials	<ul style="list-style-type: none"> Hazardous substances will only be transported by operators licensed for that particular substance. 	National legislation (Table 3-1) IFC PS1, PS2, PS3 and PS4	Hazardous material transport records Agreements made with the licensed companies	Documentation check	Quarterly during construction and operation And as needed	HSE Responsible Contractors and Suppliers
Working with hazardous substances	<ul style="list-style-type: none"> All personnel working with hazardous materials will be provided with appropriate PPE. Working with hazardous substances will only be performed by the employees who have the relevant vocational training. Working with hazardous substances will be performed with work permit. General and substance-specific handling principles given within this HMMP will be implemented. 	National legislation (Table 3-1) IFC PS1, PS2, PS3 and PS4	Training records / vocational certificates PPE embezzlement reports Work permit records for working with hazardous substances	Documentation check Visual observation	Monthly during construction and operation And as needed	HSE Responsible OHS specialist Contractors and Suppliers
Community participation and awareness	<ul style="list-style-type: none"> The risks that may arise from the project will be explained in information meetings to be held with the participation of local people and these meetings will be recorded. Emergency measures and intervention methods will also be one of the topics of these meetings. 	National legislation (Table 3-1) IFC PS1, PS2, PS3 and PS4	Minutes of meetings Photographs and presentations of the meeting	Documentation check	Quarterly during construction and operation And as needed	HSE Responsible Contractors and Suppliers
Selection of Contractors and Suppliers	<ul style="list-style-type: none"> The process will identify potential risks and evaluate the compliance of the contractor/supplier's existing ESHS and workforce management processes with Project standards, 	National legislation (Table 3-1)	Selection criteria provisions	Implementation of the Selection Criteria	During the contractor/supplier selection before the start of work	Operations Manager / Site Chief

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>including the ability to supply all required work and services.</p> <ul style="list-style-type: none"> • Only contractors that meet the selection criteria will be selected. • To ensure that all subcontractors and companies in the supply chain comply with Project standards, the selection process will ensure that the selected contractor/supplier also has an appropriate subcontractor and supplier selection process. • The selection process, including the risk assessment, will be documented and records maintained. • The selection process will also include a re-evaluation of contractors and suppliers. • Re-evaluation will be applied if major changes are made to Project standards or SoW. 	IFC PS1, PS2, PS3 & PS4	<p>Presence of selection criteria of the Contractor</p> <p>Selection process documentation and records</p> <p>Re-evaluation records (if any)</p>	Documentation check	Updates and re-evaluations if major changes are made to Project standards or SoW.	<p>HSE Responsible</p> <p>HR Responsible</p>
Preparation of SoW	<ul style="list-style-type: none"> • Compliance of the SoW with the contract clauses and Project Standards will be ensured. • A provision will be included in the Contractor/Supplier's SoW, clearly emphasizing that it is obliged to fully comply with the Project standards. • The scope of responsibilities and authorities of Contractors/Suppliers will be clearly stated within the SoW. 	National legislation (Table 3-1) IFC PS1, PS2, PS3 & PS4	<p>Presence of a provision of fully compliance with the Project standards in the SoW</p> <p>Presence of responsibilities and authorities of the</p>	Documentation check	During the preparation of the SoW before the start of work	<p>Operations Manager / Site Chief</p> <p>HSE Responsible</p> <p>HR Responsible</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> All ESHS and workforce management-related restrictions that Contractors/Suppliers will comply with will be clearly stated within the SoW. All Contractors/Suppliers will be responsible for meeting the Project quality standards. ESHS risks determined specifically for the work to be performed by the Contractor will be clearly stated within the SoW. 		<p>Contractors/suppliers in the SoW</p> <p>Presence of the ESHS and workforce management restrictions in the SoW</p> <p>Presence of the work specific ESHS risks in the SoW</p>			
Compliance with Project Standards	<ul style="list-style-type: none"> Contractors are obliged to provide support to ensure that their subcontractors fulfill the requirements determined according to the Project Standards. All cases of non-compliance of subcontractors regarding ESHS and workforce management will be reported to the Project Management by the Contractors. Contractors will ensure that their subcontractors take adequate mitigation and corrective/preventive actions. 	National legislation (Table 3-1) IFC PS1, PS2, PS3 & PS4	<p>Non-compliance records</p> <p>CPA records</p> <p>Audit records</p> <p>Labor Audit Control Forms</p>	<p>Documentation check</p> <p>Visual observation</p>	<p>Monthly during construction and operation</p> <p>and as needed</p>	<p>Operations Manager / Site Chief</p> <p>HSE Responsible</p> <p>HR Responsible</p> <p>Project Managers and HSE Staff of the Contractors</p>
Preparation of monthly ESHS Reports	<ul style="list-style-type: none"> Monthly ESHS reports will include evaluations of the Project's performance regarding environmental, social, OHS and 	National legislation (Table 3-1)	Content of the monthly ESHS reports	<p>Documentation check</p> <p>Visual observation</p>	Monthly during construction and operation	Operations Manager / Site Chief

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	workforce management, as well as implemented mitigation and CPA. <ul style="list-style-type: none"> • Project Management will provide assistance in the implementation of mitigation and CPA by auditing monthly ESHS reports. • The ESHS performance of the project will be kept at a level that ensures full compliance with the Project Standards. • Contractors are obliged to provide Project Management with all documentation required for Project Management's annual performance reports. This documentation will consist of, but is not limited to: <ul style="list-style-type: none"> ○ Accident/incident records, ○ Training records, ○ Statistics of the waste generated by their types; records of the wastes being given to licensed facilities according to their types, ○ Hazardous substance registration and inventory, including Material Safety Data Sheets (MSDS), ○ Internal and external grievance records, efforts to resolve grievances, 	IFC PS1, PS2, PS3 & PS4	Audit records Labor Audit Control Form Presence of the necessary documentation for ESHS and labor performance monitoring			HSE Responsible HR Responsible Project Managers and HSE Staff of the Contractors

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> ○ Records of stakeholder interviews and information meetings, ○ Information regarding social responsibility projects carried out, ○ CPA records, ○ Risk analysis records, ○ Environmental accident and Leak-Spill records, ○ Emergency drill records, ○ Records of environmental measurements, occupational hygiene measurements and analysis records, ● Workforce statistics, including gender data and local employment data. 					
Risk Analysis	<ul style="list-style-type: none"> ● During the analysis studies, the OSS and personnel who are knowledgeable and experienced about the activities and processes will be involved and a Risk Analysis Team will be formed. ● The Risk Analysis Team will be trained on the issue. ● In order for the completed risk analysis studies to be accepted, they will be signed by the OSS, Occupational Physician, Site 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Training records of the Risk Analysis Team Presences and compliance of the Risk Analysis Report	Documentation check Visual observation	Annual during construction and operation	Operation Manager/Site Chief HSE Responsible OSS Occupational Physician

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	Chief/Operations Manager and Worker Representative. <ul style="list-style-type: none"> In risk analysis studies, legal obligations regarding activities will be specified. Prepared risk analyzes will be kept in the construction/operation to be shown in possible inspections. 					Worker Representative Other members of the Risk Analysis Team
Work Instructions	<ul style="list-style-type: none"> The work to be carried out within the scope of the project will be carried out in accordance with the issues specified in the Work Instructions, including but not limited to the following. These instructions will be approved by the occupational safety expert and the relevant department manager by checking the working conditions, and then the work will be started. <ul style="list-style-type: none"> Heavy Load Carrying and Lifting Work Instructions Electrical Works Working Instructions Instructions for Working in Confined Areas Excavation Work Instruction Instructions for Working with Chemical Substances and Storage Instructions for Working at Height in Wind Turbines 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Presence and availability of the Work Instructions Site audits	Documentation check Visual observation	Monthly during construction and operation	Operation Manager / Site Chief HSE Responsible OSS

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> ○ Hot Works Working Instructions ○ Working at Height Instructions ● Visitor Instructions 					
Social Facilities and Site Rules (Water supply, cleaning, toilets, breaks and rest areas, dormitory, cafeteria and kitchen)	<ul style="list-style-type: none"> ● In work areas and offices, potable water will be provided, and its temperature will be kept within acceptable limits. ● Hot drinks will also be available. ● Drinking water will be provided by purchasing ready-made water. ● Domestic water tests will be performed and recorded every 6 months. 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Cleaning Control Forms for offices and toilets	Documentation check Visual observation	Monthly during construction and operation	Operation Manager / Site Chief
	<ul style="list-style-type: none"> ● There will be a suitable and sufficient number of showers, WCs and sinks in work areas and offices. It will be ensured that these areas are always open for use, clean and hygienic. ● Cleaning performed will be recorded using Cleaning Control Forms. 		Dormitory control checklist (if dormitory exists)			HSE Responsible
	<ul style="list-style-type: none"> ● There will be a sufficient number of toilets in the project. ● It will be ensured that toilets have adequate lighting and are clean and healthy. ● Cleaning performed will be recorded using Cleaning Control Forms. 		Cleaning Control Forms for cafeteria and kitchen (if exists)			HR Responsible
	<ul style="list-style-type: none"> ● Safely heated/cooled areas in accordance with seasonal 		Awards and Penalties given			Worker Representative

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>conditions will be provided so that employees can be in areas protected from sun, rain and cold during their rest breaks.</p> <ul style="list-style-type: none"> • If there is a workers' dormitory, the following requirements will apply: • In accordance with international standards, at least 12 m³ of air volume per person will be provided in the room. • There will be a closed shoe rack at the entrance of the dormitory where work shoes can be left and a locked wardrobe for each employee. • The beds will be cot/bunk beds and sufficient blankets will be provided to cover them. • Dormitories will be cleaned and disinfected periodically. • Dormitory rooms will have windows with fly screens to provide ventilation and a safe heating system. • Cooking and eating, smoking and lighting fires will not be allowed in dormitories. • Currently, employees bring their own meals or order them from outside. If required by the project, the following requirements will be applied in case of establishing a cafeteria; 					

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> • There will be cafeterias with tables and chairs suitable for the number of employees. • Employees will be provided with calorie-calculated meals for each meal, and a sample will be taken from the meals for each meal and kept in closed containers in the refrigerator for 72 hours. • Periodic health examinations and hygiene checks will be carried out for the personnel working in the cafeteria and tea service. • Cafeteria staff will use clean aprons, bonnets and shoe covers. • A special locker will be provided for the personnel to store their daily clothes. • Only cafeteria staff will enter the cooking area. • Adequate lighting and ventilation will be provided in the dining hall, and the windows will be double-hung and have fly screens. The material entering the warehouses first will be consumed first. Food materials that have expired will be monitored. • Daily cleaning and weekly disinfection will be done in the kitchen and dining hall and will be 					

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>recorded with Cleaning Control Forms.</p> <ul style="list-style-type: none"> It is forbidden to use, possess and distribute alcoholic beverages, intoxicants, drugs, illegal or unauthorized drugs and drug paraphernalia in the workplace. Employees will not work while under the influence of any drug/alcohol that will affect their working characteristics, reflexes, coordination or adversely affect the safety of other employees while on duty. The use of drugs sold by legal prescription will be allowed, provided that the original prescription is in the medicine box and the prescription is written by a specialist physician for the staff. Legal prescription drugs must not affect the functioning ability, reflexes, coordination and responsiveness of the person taking the medication. Award-Penalty Procedure will be implemented. 					
Workers' Health	<ul style="list-style-type: none"> The monthly service period of the occupational physician and other health personnel will be determined in accordance with the procedures 	National legislation (Table 3-1)	Worker Health Examination Records	Documentation check Visual observation	Monthly during construction and operation	Operation Manager / Site Chief

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>specified in the relevant Regulation, taking into account the current number of personnel in the facility and the hazard class determined according to the field of activity.</p> <ul style="list-style-type: none"> Responsible managers will inform their employees about the Occupational Physician's visit dates, hours and duration. The Occupational Physician will be able to write prescriptions during field visits, upon the request of the staff or after the examinations carried out upon his own request, provided that it is stated in the Protocol Book. Routine site visits of the occupational physician and other health personnel will be recorded. General health examinations will be performed/repeated for employees when they start work, change jobs, and return to work after repeated dismissals due to work accidents, occupational diseases, or health. During the continuation of the work, routine repetitions of inspection will be carried out in accordance with the relevant regulation. Personnel will not be allowed to work without obtaining a medical 	IFC PS1, PS2 & PS4	<p>Occupational Physician's Protocol Book</p> <p>Personnel' medical health reports</p>			<p>HSE Responsible</p> <p>HR Responsible</p> <p>Worker Representative</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>report showing that they are suitable for work.</p> <ul style="list-style-type: none"> Personnel health files will be created, monitored and controlled. 					
Personal Protective Equipment (PPE)	<ul style="list-style-type: none"> All personnel are obliged to use PPE appropriate to the work they do. These PPEs will be delivered to the personnel upon entry to work upon signature. The Delivery Receipt Form will be used in delivery transactions. The personnel will use the PPE delivered to them in a clean, orderly manner and only for work-appropriate purposes. Employees will be trained on PPE usage and awareness will be raised. A Malfunction Reporting Form will be created for PPE that is worn out or unusable and the relevant PPE will be replaced with a new one. The cost of PPE will not be reflected to the employee. The compliance of the PPE supplied and installed with the production standards will be checked by the OSS and other managers/personnel. The use of PPE without the CE marking will definitely not be allowed. 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	<p>PPE Delivery Receipt Form</p> <p>Training records</p> <p>PPE Malfunction Reporting Form</p> <p>PPE Control Form</p> <p>Working at Height Equipment Control Form</p>	<p>Documentation check</p> <p>Visual observation</p>	<p>Monthly during construction and operation</p>	<p>Operation Manager / Site Chief</p> <p>HSE Responsible</p> <p>HR Responsible</p> <p>Worker Representative</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> • Personnel who will work at height will be provided with PPE suitable for the work to be done at height, and when necessary, vertical stoppers will be provided on their seat belts. • PPE specific for working at height will be visually checked before each use, and a general check will be made annually and recorded with the PPE and Equipment Control Form. • All PPE will: <ul style="list-style-type: none"> ○ be suitable to prevent the relevant risk without creating additional risk itself, ○ be appropriate to the conditions existing in the workplace, ○ be suitable for the ergonomic needs and health status of the user, ○ fit the user perfectly when the necessary adjustments are made. ○ have the appropriate CE marking and Turkish user manual. • PPE will be visually checked before each use. • Workers without PPE will not be allowed to work on site. 					

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> If the use of earplugs, dust masks, etc. is foreseen as a result of risk analysis, these will also be given to the personnel doing the work. 					
Occupational Health and Safety (OHS) Board	<ul style="list-style-type: none"> In cases where there are 50 or more employees and continuous work is carried out for more than six months, a board will be formed to carry out studies on occupational health and safety. The Board will meet at least once a month. However, the board may decide to determine this period as two months for hazardous workplaces and three months for less hazardous workplaces, taking into account the hazard class of the workplace. The agenda, place, day and time of the meeting will be notified to the Board members at least forty-eight hours before the meeting. The Board consists of the following people: <ul style="list-style-type: none"> Employer or employer representative, OSS, Occupational physician, A person responsible for carrying out human resources, personnel, 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Board Decisions Board Agenda and Notification Records	Documentation check Visual observation	Monthly during construction and operation and as needed	Operation Manager / Site Chief HSE Responsible Worker Representative

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	social affairs or administrative and financial affairs, o If available, foreman, • Worker representative, chief representative if there is more than one worker representative in the workplace.					
Worker Representative	• In the project, a sufficient number of worker representatives will be assigned by selection among employees or, in cases where it cannot be determined by election, by appointment, provided that care is taken for balanced distribution, taking into account the risks in different parts of the workplace and the number of employees.	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Worker Representative Election records Worker Representative Assignment Letter Worker Representative Training Records	Documentation check Visual observation	Monthly during construction and operation	Operation Manager / Site Chief HSE Responsible OSS
Work Stoppage	• If a life-threatening issue is detected for employees in the buildings and extensions in the project, working methods and styles, or work equipment, work will be stopped in a part or all of the workplace until this danger is eliminated, taking into account the nature of the life danger and the area and employees that may be affected by the risk arising from this danger.	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Work Stoppage and Reason Records	Documentation check Visual observation	Monthly during construction and operation	Operation Manager / Site Chief HSE Responsible Worker Representative

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
Worker Rights	<ul style="list-style-type: none"> • Within the scope of the project, no discrimination will be made against any employee based on language, race, gender, political opinion, philosophical belief, religion, gender and similar reasons, and every employee candidate will be given equal opportunity during the employment process. • Child labor is prohibited within the scope of the project. • Forced labor is prohibited within the scope of the project. • There will be no inequality between genders within the scope of the project. • Within the scope of the project, necessary training and awareness-raising activities will be organized for all employees on gender inequality and gender-based violence (GBV), sexual exploitation and abuse (SEA) and sexual harassment (SH). • Project employees will be informed about the Code of Conduct (CoC), including GBV, SEA/SH, and will undertake to comply with the rules. • The internal grievance mechanism of the Project will be kept active and accessible to all Project employees, 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Employment records SSI records Training records Internal grievance records	Documentation check Visual observation	Monthly during construction and operation	Operation Manager / Site Chief HSE Responsible HR Responsible Worker Representative

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	including contractors, subcontractors and suppliers.					
Maintenance and Repair Works	<ul style="list-style-type: none"> After large, fixed and mobile devices are checked according to the criteria defined in this section, if they are not found suitable, a red 'USE PROHIBITED' label will be affixed. Naturally, the use of a device/equipment bearing the 'USE PROHIBITED' label is prohibited. However, issues such as raising awareness of personnel on this issue and sanctions after detecting the use of prohibited devices will also be discussed during OHS basic training and standard toolbox training. When the non-conformance situation regarding each labeled device/equipment is resolved, a green label will be affixed to the device to indicate that the use of the device does not pose a risk, and thus permission for use will be given. Operating the devices during maintenance work may pose a danger to both the personnel performing the maintenance and the personnel who will use the device. For this reason, the label created for the purpose of announcing 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Machinery and Equipment Maintenance and Repair Control Forms Machinery and Equipment Maintenance and Repair Plan	Documentation check Visual observation	Monthly during construction and operation	Operation Manager / Site Chief HSE Responsible OSS

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>maintenance work to other personnel will be attached to the on-button of the device and to the surface(s) that can be easily seen on the device. For devices with large sizes, it may be necessary to label several points on the surface.</p> <ul style="list-style-type: none"> • Devices and equipment with small dimensions will not be labeled. If the device/equipment in question is not found suitable after the checks, it will be moved out of the field to a place determined by the OSS and will be kept in this area until it is made suitable. This location will be announced to the staff. • Devices and equipment to be used in the field must bear the CE marking. The use of devices and equipment that do not comply with CE norms is prohibited. 					
Machinery and Equipment Safety	<ul style="list-style-type: none"> • All machinery and equipment in the work area will be recorded in the Machinery and Equipment List. • Machinery and equipment checks will be carried out according to this list and the Machinery-Equipment Maintenance-Repair Plan to be prepared. 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	<p>Machinery and Equipment List</p> <p>Machinery and Equipment Maintenance and Repair Plan</p>	<p>Documentation check</p> <p>Visual observation</p>	Monthly during construction and operation	<p>Operation Manager / Site Chief</p> <p>HSE Responsible</p> <p>OSS</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Machinery and equipment will be used/operated in accordance with the manufacturer's instructions. Before the work begins, the machine or equipment will be checked and if there is a defect, no work will be done with that machine or equipment. Details safety measures are given in Appendix 1. 					
Occupational Accidents and Occupational Diseases	<ul style="list-style-type: none"> In case of an occupational accident, legal regulations will be followed. After occupational accidents, an 'Accident/Incident Report' will be filled out, and after near misses, a 'Near Miss Form' will be filled out. Mutluer Enerji will keep a record of all occupational accidents and occupational diseases, make the necessary investigations and prepare reports regarding them. Incidents that occur in the workplace but do not cause injury or death, but cause damage to the workplace or work equipment, or have the potential to cause damage to employees, workplaces or work equipment, will be examined and reports will be prepared regarding these incidents. 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Accident/Incident Report/Record Near Miss Form SSI notifications and records Accident Report CPA records	Documentation check Visual observation	Monthly during construction and operation	Operation Manager / Site Chief HSE Responsible OSS Occupational Physician

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> • Notification will be made to the Social Security Institution (SSI) within the periods specified below: <ul style="list-style-type: none"> ○ Occupational accidents within three (3) working days after the accident, ○ Occupational diseases reported to him by health care providers or occupational physicians within three (3) business days from the date he learns about them. • Occupational physicians or health service providers will refer cases where they have a preliminary diagnosis of occupational disease to health service providers authorized by the SSI. • After an occupational accident, an Accident Report will be prepared. The Report will be prepared to include all details such as root cause analysis, photographic evidence, relevant training, witness statements, etc. The work area where the casualty was injured will be indicated by drawing and information regarding the injury will be described appropriately. • Accident and Near Miss incidents will be recorded and followed up with incident types, locations, dates, 					

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>descriptions, results, photographs and relevant Corrective-Preventive Actions (CPAs).</p> <ul style="list-style-type: none"> Details regarding work accidents are given in Appendix 2. 					
Corrective-Preventive Actions (CPA)	<ul style="list-style-type: none"> Any nonconformities detected during the activities will be recorded via the Corrective-Preventive Action (CPA) Request Form. Each record in question will also be recorded in the CPA Tracking List. The CPA List will be prepared to include the date of detection of the non-conformity, the corrective/preventive action determined, the correction/prevention carried out and the error closure dates. The CPA List will be created to include before and after pictures of the non-compliance. Each recorded nonconformity will be stated in the risk analysis by the OSS and/or Occupational Physician and HSE Responsible, and the residual risk account will be revised after the actions taken. 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	<p>CPA records</p> <p>CPA List</p>	<p>Documentation check</p> <p>Visual observation</p>	<p>Monthly during construction and operation</p>	<p>Operation Manager / Site Chief</p> <p>HSE Responsible</p> <p>OSS</p>
Work Permits	<ul style="list-style-type: none"> Work permit forms are filled in for the jobs listed below. <ul style="list-style-type: none"> Heavy Load Carrying and Lifting Electrical work 	National legislation (Table 3-1)	<p>Work permits</p> <p>Work Permit Forms</p>	<p>Documentation check</p> <p>Visual observation</p>	<p>Monthly during construction and operation</p>	<p>Operation Manager / Site Chief</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> ○ Entry to Confined Spaces ○ Welding Works ○ Excavation Works ○ Working at Height ● The Operations Manager who has the work done is the site responsible, and the work cannot be started unless his approval is received. ● The Work Permit Procedure will be implemented to ensure that works requiring work permits are constantly monitored and controlled, and to determine methods for reducing risks in terms of occupational health and safety. ● The Work Permit Form is included in the annex to the Procedure in question. 	IFC PS1, PS2 & PS4				HSE Responsible OSS
Emergency Preparedness and Response	<ul style="list-style-type: none"> ● An Emergency Preparedness and Response Plan (EPRP) has been prepared, including on-site and off-site emergencies. ● EPRP will be implemented. ● An Emergency Response Plan will be prepared by Joint Health and Safety Unit (JHSU), which provides OHS services, in accordance with the relevant legislation and will be revised within the legal period. 	National legislation (Table 3-1) IFC PS1, PS2 & PS4	Presence and compliance of EPRP Emergency Response Team list Emergency Response Team trainings Drill records	Documentation check Visual observation	Monthly during construction and operation	Operation Manager / Site Chief HSE Responsible OSS Occupational Physician

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> • If changes occur that may affect the identified emergencies or cause new emergencies to arise, the EPRP will be renewed completely or partially depending on the magnitude of the impact. • Visitors to the site will also be informed about possible emergency situations, and visitors will be allowed into the site after signing and receiving the Visitor Information Form. • Emergency team lists will be created for emergencies. These lists will be announced to all employees on bulletin boards. • If there is a change in the emergency teams, the OSS will revise the Emergency Plans on the day of the change. • Suitably equipped and trained employees will be assigned for each of the fields of search, rescue and evacuation, firefighting, leakage-spill response, in numbers and qualities in accordance with the legislation in force. • Employees will also be given the following information: <ul style="list-style-type: none"> ○ Nearest emergency meeting place 		Training records			Emergency Response Team

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> ○ Transportation and contact information to the nearest hospital, fire brigade, gendarmerie, police, AFAD etc. legal stakeholders. ○ Location of fire extinguishers and first aid kits ○ Information on how to use fire extinguishers. ○ Information on how to use spill response equipment. ● In cases of serious injury, the decision on how and where the injured person will be transferred will be made by the Site Chief/Operations Manager and the necessary arrangements will be made. ● All employees will be given basic training on what to do in case of emergency. ● Emergency teams will be given training specifically tailored to their subjects and will be recorded. ● Drills will be carried out with different scenarios and these drills will be recorded with the Drill Report. ● For details, the EPRP should be consulted. 					

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
Project access and security	<ul style="list-style-type: none"> The project area will be fenced. Security personnel will be hired. Security personnel will have the necessary legal training and certificate. Security personnel will be given the training regarding Code of Conduct (CoC) (and how to interact with the locals, if necessary). All visitors will be recorded at the entrance of the site, and those will be given a visitor' instructions including emergency situations and HS. Unregistered or unauthorized access to the site will not be allowed. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	Training records Visitor records Presence and compliance of the fence	Visual observation Documentation check	Monthly during construction and operation	Operations Manager / Site Chief HSE Responsible Contractors and Suppliers
Infectious diseases	<ul style="list-style-type: none"> Staff will have regular health checks. Disease preventive hygiene and cleaning measures will be taken. Practices to be taken to protect against infectious diseases are explained in detail in the Infectious Disease Directive. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	Health check records Cleaning checklist and shift list	Visual observation Documentation check	Monthly during construction and operation	Operations Manager / Site Chief HSE Responsible Occupational Physician Contractors and Suppliers
Social conflict	<ul style="list-style-type: none"> All personnel will be given CoC training and sign the CoC instructions. 	National legislation (Table 3-1)	Penalties given for violating the rules	Visual observation	Once after recruitment, then, biannually	Operations Manager / Site Chief

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Penal sanctions and/or disciplinary procedures will be applied to employees who do not comply with the Code of Conduct and those who violate the rules. If necessary, personnel, especially coming from other cities or countries, will be given training or awareness session regarding the cultural features of the local people. Violence or use of force will not be used under any circumstances. 	IFC PS1, PS2 and PS4	CoC training records Signed CoC instructions Cultural features training records (if any)	Documentation check	during construction and operation and as needed.	HSE Responsible Contractors and Suppliers
Visual impacts	<ul style="list-style-type: none"> Visual impacts will be evaluated, and necessary mitigation measures will be taken according to severity of the specific impact. Landscape arrangements may be performed, or painting of the buildings or turbines may be changed to more convenient with the natural landscape. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	Mitigation measure taken	Visual observation Documentation check	During construction phase considering the operation phase	Operations Manager / Site Chief HSE Responsible Contractors and Suppliers
GBV, SEA/SH risks	<ul style="list-style-type: none"> All personnel will be trained on GBV, SEA/SH. GM will be implemented by considering the confidentiality. It will be transferred to the national legal system together with evidence of GBV and/or SEA/SH incidents. 	National legislation IFC PS1, PS2 and PS4	Training records Grievance records	Documentation check	Monthly during construction and operation phases as needed for the court cases	HSE Responsible Contractors and Suppliers
General Traffic Arrangements	<ul style="list-style-type: none"> Vehicle routes will be directed so as not to pass directly next to 	National legislation (Table 3-1)	Vehicle routes	Visual observation	Monthly during construction and	Operations Manager / Site Chief

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<p>pedestrian paths or through residential areas.</p> <ul style="list-style-type: none"> If a vehicle route is to be created directly adjacent to a pedestrian path, the two lines will be separated from each other using cones and rope or plastic barriers. Under no circumstances are personnel allowed to use mobile phones while driving. Failure to comply with this requirement is considered a violation of these plan requirements and may result in removal of access to the site. If it is necessary to use a mobile phone on foot, people should ensure they are positioned in a safe location before making a call. These people should remain motionless and not obstruct the work around them. All Project drivers will have a fire extinguisher and first aid kit in their vehicles. 	IFC PS1, PS2 and PS4	<p>Penalties given to personnel for noncompliance of this Plan</p> <p>Presence and availability of fire extinguishers and first aid kits in the vehicles</p>	Documentation check	operation phases	<p>HSE Responsible</p> <p>Drivers and operators</p>
Speed limit	<ul style="list-style-type: none"> A site speed limit of 30 km/h will be applied on access roads in construction and operation areas. The site speed limit will be announced to everyone through orientation training, and speed limit signs will be placed on all operating roads. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	<p>Penalties given to personnel for noncompliance of this Plan</p> <p>Presence and availability of the traffic signs</p>	<p>Visual observation</p> <p>Documentation check</p>	Monthly during construction and operation phases	<p>Operations Manager / Site Chief</p> <p>HSE Responsible</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> • A method such as personnel authorization, establishment of a vehicle tracking system, etc. will be chosen to control the speed limit around the site. • Roads and intersections subject to heavy traffic will be enhanced with additional mitigation measures such as traffic control, speed reduction systems and warning signals and/or speed bumps. • All subcontractor and supplier drivers will be informed of the existence of these points. • Risk assessments will be carried out for access routes to the field site passing through public areas. • The following speed restrictions apply throughout the project area: <ul style="list-style-type: none"> ○ Project site: 30 km/h ○ Office and social areas: 20 km/h ○ Exit to the main road from the main gate of site and office areas: 40 km/hour ○ Main roads: 90 km/h or according to Turkish Traffic laws legal speed limits. • Personnel found to be violating speed limits will be subject to disciplinary penalties. 		Training records Grievance records			Drivers and operators

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Grievance mechanism will be implemented. 					
Load Safety	<ul style="list-style-type: none"> It is important that any equipment or material being transported is secured using correct load handling techniques for safe transport. In order to prevent the transported materials and equipment from falling off the vehicles, all loads entering and exiting the site will be fixed using appropriate fixing methods. The transported loads will not pose an obstacle to the environment or other vehicle drivers. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	Compliance with the handling and fixing techniques Accident records	Visual observation Documentation check	Monthly during construction and operation phases	Operations Manager / Site Chief HSE Responsible Drivers and operators
Weather Conditions	<ul style="list-style-type: none"> Site management and all site personnel will check weather forecasts and subcontractors will be informed of any limitations and restrictions on vehicle movements and site access, if any. Rain on stabilized roads can cause driving ruts, trigger mud tracking on operating roads, and pose a physical risk to the site and personnel. When there is a risk of severe weather, weather information will be shared with all parties to ensure that all precautions are taken and stop traffic movement on high-risk roads. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	Weather forecast tracking Number of work-stoppage due to the heavy weather conditions	Visual observation Documentation check	Monthly during construction and operation phases	Operations Manager / Site Chief HSE Responsible Drivers and operators

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
Junctions / Intersections	<ul style="list-style-type: none"> These areas are considered high risk due to the potential for increased interaction with other vehicles, facilities, and pedestrians. To ensure the safety of all people in and around intersections, the following points will be taken into consideration: <ul style="list-style-type: none"> Make sure the road is clear before crossing intersections Obey existing traffic signs when entering designated work areas Slow down and obey traffic signs Install road stop signs at busy traffic intersections Always come to a complete stop where there are "stop" signs 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	Accident records	Visual observation Documentation check	Monthly during construction and operation phases	Operations Manager / Site Chief HSE Responsible Drivers and operators
Pedestrian Safety	<ul style="list-style-type: none"> Special pedestrian walking paths will be built in the project area. Where there is a pedestrian crossing, all pedestrians have priority. All drivers must stop and yield to passing pedestrians. In residential areas, drivers will act in accordance with pedestrian crossing priority. Grievance mechanism will be implemented. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	Presence and availability of the pedestrian walking paths Grievance records	Visual observation Documentation check	Monthly during construction and operation phases	Operations Manager / Site Chief HSE Responsible Drivers and operators

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
Traffic Control and Management	<ul style="list-style-type: none"> The use of parking and maintenance areas on designated routes, possible air, noise and waste pollution, road signs and signboards, and the condition of roads that may have changed due to weather conditions will be constantly checked. The use of vehicles by drivers who have not received environmental and OHS training will be prevented, the driver's licenses of the vehicle drivers will be checked during the recruitment processes, the periodic maintenance of the vehicles will be monitored and regular maintenance of the vehicles will be ensured. If temporary traffic signs are placed, negotiations will be held with the competent authorities regarding the signs and their locations. Signs shall be secured to prevent their removal. Signs will be checked regularly to be cleaned and reinforced if necessary. Warning signs will be placed at passages near sensitive areas, archaeological sites and residential areas, and stopping and parking in these areas will be prohibited except for emergencies. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	<p>Compliance of the parking and maintenance areas</p> <p>Training records</p> <p>Presence and availability of the traffic signs and warnings</p> <p>Rewards and penalties records</p> <p>Grievance records</p>	<p>Visual observation</p> <p>Documentation check</p>	Monthly during construction and operation phases	<p>Operations Manager / Site Chief</p> <p>HSE Responsible</p>

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Except for emergencies, vehicles will not be parked in areas other than pre-determined parking areas on main roads and service roads, and no refueling or maintenance will be carried out. Unnecessary honking of the horn near residential areas will be prevented. It will be ensured that occupational health and safety rules are fully complied with, possible accidents are minimized and the negative environmental effects associated with them are minimized. Rewards and penalties will be imposed on drivers who are found not to comply with the specified traffic rules. Grievance mechanism will be implemented. 					
Car Park Areas	<ul style="list-style-type: none"> Parking areas on the project area, service roads and road transport route will be determined in advance and drivers will be informed about this. Except for emergencies, vehicles will not be parked outside designated parking areas. Parking will be done in designated parking areas, in the direction of the exit. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	Presence and availability of the parking lot Compliance with the standards	Visual observation Documentation check	Monthly during construction and operation phases	Operations Manager / Site Chief HSE Responsible Drivers and operators

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> In the parking areas, the necessary absorbent and anti-spreading material (spill kit, plastic bag and label to put the contaminated absorbent material, etc.) will be available for possible oil-fuel leaks caused by vehicles. In cases of leakage or spillage, the parking area will be cleaned in accordance with the Leakage-Spill Emergency Response Procedure, and the collected waste will be disposed of in accordance with the Waste and Wastewater Management Plan. Vehicle maintenance will not be carried out in parking areas, and if car washing is considered, it will be done using an oil separator system in the section where there is a manhole connected to the infrastructure system. Parking areas will be allocated and identifying signs will be placed in these areas. Signs stating "Park Your Vehicle in the Exit Direction" will be placed. Parking areas will have lighting. 					
Vehicle Maintenance	<ul style="list-style-type: none"> There is no maintenance and repair workshop in the project area. 	National legislation (Table 3-1)	Periodic oil change and fuel procurement records	Visual observation	Quarterly during construction and	Operations Manager / Site Chief

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
and Fuel Supply Areas	<ul style="list-style-type: none"> Maintenance is done at nearby services. According to the Waste Oil Management Regulation, in case of waste mineral oil on the site (except for fixed equipment such as generators etc.), an "Engine Oil Change Point Permit Certificate" will be obtained. Fuel needs are met from the surrounding fuel stations. 	IFC PS1, PS2, PS3 and PS4	outside the project area	Documentation check	operation phases	HSE Responsible Drivers and operators
Vehicle Standards and Maintenance	<ul style="list-style-type: none"> In accordance with the relevant standards, the noise levels and exhaust emissions of all vehicles will be within accepted limits and will not affect employees and local residents, and vehicle maintenance will be carried out regularly at authorized services to ensure these values. Exhaust gas emission measurements of all vehicles will be made by authorized institutions within the legal period. The durability of the exhausts of the vehicles used will be constantly checked observationally, care will be taken to ensure that there are no holes, bursts, etc., starting from the engine to the last silencer, and that the connections are intact. 	National legislation (Table 3-1) IFC PS1, PS2, PS3 and PS4	Records of exhaust emission inspection of the vehicles	Visual observation Documentation check	Annual for the exhaust emissions Daily for visual observation during construction and operation phases	Operations Manager / Site Chief HSE Responsible Drivers and operators

Aspects	Mitigation Measures	National and International Rationale	Monitoring Activities for Full Compliance			Responsible
			Parameter	Method	Time Schedule / Period	
	<ul style="list-style-type: none"> Vehicles used will be constantly checked observationally for leaks such as oil, fuel etc. The new vehicles purchased will comply with European Union emission standards. 					
Traffic Accidents	<ul style="list-style-type: none"> Accidents that occur due to traffic factors in the business area or on the roads used to reach the business are also work accidents. In such cases, the necessary legal notifications will be made to the relevant authorities without delay. Accident root cause analyzes will be conducted and refresher training will be organized for those involved in the accident and, if necessary, for all drivers. Grievance mechanism will be implemented. 	National legislation (Table 3-1) IFC PS1, PS2 and PS4	Traffic accident records Root cause analysis Grievance records	Visual observation Documentation check	Monthly during construction and operation phases and as needed.	Operations Manager / Site Chief HSE Responsible Drivers and operators
Transportation of hazardous materials	<ul style="list-style-type: none"> Hazardous substances will only be transported by operators licensed for that particular substance. 	National legislation IFC PS1, PS2, PS3 and PS4	Hazardous material transport records Agreements made with the licensed companies	Documentation check	Quarterly during construction and operation And as needed	HSE Responsible Contractors and Suppliers

7. KEY PERFORMANCE INDICATORS

The Key Performance Indicators (KPIs) which will be used for the follow-up of the implementation performance are given in Table 7-1 below.

Table 7-1. Key Performance Indicators¹

No	KPI	Target / Goal	Monitoring Tool
1	Wastewater and water management		
1.1	Management of wastewater in accordance with legislation	Full compliance	<ul style="list-style-type: none"> • Sewage truck records (monthly)
1.2	Non-compliance with the requirements of this plan	A periodic decrease in the number of nonconformances (monthly) Zero nonconformance	<ul style="list-style-type: none"> • Monitoring records (monthly)
1.3	Nonconformities that were closed with corrective actions implemented	Target is %100 Periodic decrease (monthly)	<ul style="list-style-type: none"> • Periodic reporting (monthly)
1.4	Number of grievances received regarding adverse impacts on third-party water quality or quantity	Zero grievance Efficient and effective GM	<ul style="list-style-type: none"> • Grievance records (monthly)
1.5	Percentage of tests/samples that comply with legal standards for drinking water	Human health Full compliance	<ul style="list-style-type: none"> • Analyses of drinking and utility water
1.6	Participation rate of subcontractors in training on waste and wastewater	Target is %100	<ul style="list-style-type: none"> • Training records
1.7	Rate of employee participation in training on waste and wastewater	Target is %100	<ul style="list-style-type: none"> • Training records
2	Waste management		
2.1	Monthly waste amount (according to type)	Periodic decrease (monthly)	<ul style="list-style-type: none"> • Waste Register Forms • Waste disposal records
2.2	Non-hazardous waste generated (in kg)	Periodic decrease (monthly)	<ul style="list-style-type: none"> • Waste Register Forms • Waste disposal records
2.3	Hazardous waste generated (in kg)	Periodic decrease (monthly)	<ul style="list-style-type: none"> • Waste Register Forms • Waste disposal records
2.4	Recycled/reused waste (in kg)	Ensuring the decrease in waste generation	<ul style="list-style-type: none"> • Waste Register Forms • Waste disposal records
2.5	Percentage of non-hazardous and hazardous waste disposal that complies with legal requirements	Full compliance	<ul style="list-style-type: none"> • Annual Waste Declarations
3	Pollution Prevention – Air Quality		

¹ Some of the KPIs can be repeated since the KPIs are separated according to general environmental, social, health and safety aspects.

No	KPI	Target / Goal	Monitoring Tool
3.1	Percentage of monitoring results that comply with legal standards	Full compliance	<ul style="list-style-type: none"> Air quality and air emission measurement reports in case of complaint
3.2	Grievances received regarding air quality (percentage of the non-compliances)	Zero grievance Efficient and effective GM	<ul style="list-style-type: none"> Grievance records (monthly)
4	Pollution Prevention – Environmental Noise		
4.1	Percentage of monitoring results that comply with legal standards	Full compliance	<ul style="list-style-type: none"> Environmental noise measurement reports in case of complaint
4.2	Grievances received regarding noise (percentage of the non-compliances)	Zero grievance Efficient and effective GM	<ul style="list-style-type: none"> Grievance records (monthly)
5	Resource Efficiency		
5.1	Spill/leakage/accident	Periodic decrease (monthly) Zero spill/leakage	<ul style="list-style-type: none"> Accident/Incident records (monthly)
5.2	Records of electricity, fuel and water consumptions	Periodic decrease (monthly)	<ul style="list-style-type: none"> Natural Resource Consumption Records
6	Hazardous Material Management		
6.1	Leak/spill/accident	Periodic decrease (monthly) Targeted: zero leak/spill/accident	<ul style="list-style-type: none"> Spill/accident/incident records
6.2	Amount of hazardous waste (monthly)	Periodic decrease	<ul style="list-style-type: none"> Waste register records
6.3	Participation rate of subcontractors in training on hazardous materials	100% of subcontractor personnel within one month of employment	<ul style="list-style-type: none"> Training records
6.4	Participation rate of employees in training on hazardous materials	100% of the staff within one month of employment	<ul style="list-style-type: none"> Training records
6.5	Participation rate of local community in meeting on hazardous materials and emergency awareness	At least 80% of the local community participated in the meeting	<ul style="list-style-type: none"> Minutes of meeting
6.6	Number of PPE provided to the workers and rate of usage	All personnel provided with necessary PPE and 100% of workers use the PPE provided	<ul style="list-style-type: none"> PPE embezzlement records
6.7	Presence of spill kits and first aid kits	There is spill kits and first aid kits in all necessary construction sites, buildings and facility	<ul style="list-style-type: none"> Spill kit records First aid kit records
6.8	Number of hazardous materials purchased/used/ stored	All hazardous materials recorded.	<ul style="list-style-type: none"> MSDS records Hazardous Materials Inventory Form

No	KPI	Target / Goal	Monitoring Tool
6.9	Compliance of the Hazardous waste storage area and hazardous material storage area	Full compliance	<ul style="list-style-type: none"> • MSDS records • Hazardous Materials Inventory Form • Spill kit records
7	Occupational Health and Safety		
7.1	Number of non-compliances	Full compliance	<ul style="list-style-type: none"> • Audit records, • Site observations • CPAs opened
7.2	Number of accidents, incidents, near misses	Zero accident/incident/near miss	<ul style="list-style-type: none"> • Accident/incident Records, • Near Miss Forms • SSI notifications and records
7.3	Percentage of workers who receive relevant trainings (separately according to type of the training)	100% of all workers receive relevant trainings	<ul style="list-style-type: none"> • Training records
7.4	Compliance of the risk analysis	Full compliance	<ul style="list-style-type: none"> • Risk Analysis Report
7.5	Compliance of the EPRP	Full compliance	<ul style="list-style-type: none"> • EPRP, • Emergency team, • Emergency training records, • Drill records, • Emergency records
7.6	Percentage of the health examinations of the workers	100% of the workers has the health report and received health examination	<ul style="list-style-type: none"> • Health examination records • Medical health reports • Occupational Physician's Protocol Book
7.7	Compliance of the machinery and equipment	Full compliance for 100% of the machinery and equipment	<ul style="list-style-type: none"> • Machinery and equipment list, • Machinery and equipment maintenance and repair plan
7.8	Number of internal grievances (from workers) regarding OHS risks or labor and working conditions	Zero grievances	<ul style="list-style-type: none"> • Grievance records
7.9	Number of female workers	Maximum number of female employees possible	<ul style="list-style-type: none"> • Employment records • Workers' list
7.10	Number of work permits	All above-listed works are performed with work permit.	<ul style="list-style-type: none"> • Work permit records • Work permit forms
7.11	Number of CPAs closed	All CPAs are closed in a given period of time	<ul style="list-style-type: none"> • CPA records • CPA list
7.12	Number of work stoppages due to OHS risks	Zero work stoppages due to OHS risks	<ul style="list-style-type: none"> • Work stoppage records
7.13	Number of worker representatives and	Full compliance with the legal provisions: <ul style="list-style-type: none"> • Workers 2-50 → 1 	<ul style="list-style-type: none"> • Worker representative election records

No	KPI	Target / Goal	Monitoring Tool
	compliance with the legal provisions	<ul style="list-style-type: none"> Workers 51-100 → 2 Workers 101-500 → 3 Workers 501-1000 → 4 Workers 1001-2000 → 5 Workers > 2001 → 6 	<ul style="list-style-type: none"> Worker representative assignment letters Worker representative training records
7.14	Compliance of the OHS Board	If there are 50 or more employees and continuous work is carried out for more than six months, OHS Board is established	<ul style="list-style-type: none"> Board Decisions Agenda and notifications Decision implementation tracking
7.15	Compliance of the PPE usage	All workers use necessary suitable PPE while working	<ul style="list-style-type: none"> PPE Delivery Receipt Form Training records PPE Malfunction Reporting Form PPE Control Form Working at Height Equipment Control Form Site observations
7.16	Compliance of the social facilities and site rules	Full compliance	<ul style="list-style-type: none"> Cleaning Control Forms for offices and toilets Dormitory control checklist (if dormitory exists) Cleaning Control Forms for cafeteria and kitchen (if exists) Awards and Penalties given. Site observations
7.17	Presence and availability of the Work Instructions	Full compliance	<ul style="list-style-type: none"> Work Instructions Site audits
7.18	Presence and compliance of Risk Analysis	Full compliance	<ul style="list-style-type: none"> Training records of the Risk Analysis Team Risk Analysis Report
8	Community Health and Safety		
8.1	Amount of waste separated and sent to licensed facilities	All wastes are separated according to their types and sent to licensed facilities The generated amount of waste decreases periodically	<ul style="list-style-type: none"> Waste register forms
8.2	Amount of water used and wastewater generated	Periodic decrease in the water used and wastewater generated	<ul style="list-style-type: none"> Water use and wastewater generation records
8.3	Amount of chemicals stored and used in accordance with the standards	Full compliance	<ul style="list-style-type: none"> MSDS records Chemical inventory Spill kit checks Visual observation

No	KPI	Target / Goal	Monitoring Tool
8.4	Percentage of the personnel trained on spill kit usage	100% of the personnel trained on the subject	<ul style="list-style-type: none"> • Training records
8.5	Presence and availability of the periodic maintenance records of the vehicles and machinery	Full compliance	<ul style="list-style-type: none"> • Periodic maintenance records • Exhaust emission inspection records
8.6	Environmental noise measurement results compliant with the standards	Full compliance	<ul style="list-style-type: none"> • Environmental noise measurement in case of a grievance
8.7	Air quality measurement results compliant with the standards	Full compliance	<ul style="list-style-type: none"> • Air quality measurement in case of a grievance
8.8	Number of grievances on noise, air quality, traffic, etc.	Zero grievance	<ul style="list-style-type: none"> • Grievance records
8.9	Number of watering of road and construction site	Regular dust suppression at the site	<ul style="list-style-type: none"> • Watering records
8.10	Number of traffic accidents / incidents or near misses	Zero accident/incident/near miss	<ul style="list-style-type: none"> • Accident/incident records • CPA records
8.11	Presence of warnings and signs	All necessary places are marked with signs and warnings	<ul style="list-style-type: none"> • Visual observations
8.12	Percentage of the personnel trained on GBV and SEA/SH	100% of the personnel trained on the subject	<ul style="list-style-type: none"> • Training records
8.13	Number of visitors who are given visitor training of awareness	All visitors take visitor training or visitor instructions	<ul style="list-style-type: none"> • Visitor records
8.14	Presence of fence compliant with the standards	Full compliance	<ul style="list-style-type: none"> • Visual observation
8.15	Percentage of personnel attending emergency trainings and drills	100% of the personnel trained on the subject and attended to the drill	<ul style="list-style-type: none"> • Training records
8.16	Cleaning and hygiene of the site	All personnel works in clean and hygienic workplace	<ul style="list-style-type: none"> • Cleaning checklist and shift list
8.17	Percentage of personnel who passed health checks and examination	100% of the personnel are examined for health checks	<ul style="list-style-type: none"> • Health check records
8.18	Percentage of personnel who are given disciplinary penalties for violating rules	Zero personnel violate the rules	<ul style="list-style-type: none"> • Penalty records
8.19	Percentage of personnel who sign CoC instructions and take CoC training	100% personnel are given the CoC training and sign the CoC instructions	<ul style="list-style-type: none"> • Training records • Signed copies of CoC instructions
9	Emergency Preparedness and Response		
9.1	Compliance of the EPRP	Full compliance	<ul style="list-style-type: none"> • EPRP, • Emergency team, • Emergency training records, • Drill records, • Emergency records

No	KPI	Target / Goal	Monitoring Tool
			<ul style="list-style-type: none"> • CPAs opened
9.2	Number of accidents, incidents, near misses	Zero accident/incident/near miss	<ul style="list-style-type: none"> • Accident/incident Records, • Near Miss Forms • SSI notifications and records
9.3	Percentage of workers who receive relevant trainings (separately according to type of the training)	100% of all workers receive relevant trainings	<ul style="list-style-type: none"> • Training records
9.4	Number of drills performed	At least twice a year	<ul style="list-style-type: none"> • Drill Records
10	Traffic Management		
10.1	Number of grievances related to Project drivers or site traffic, speeding or exhaust (all categorized separately)	Zero grievance regarding traffic safety or environmental impact due to the vehicles or traffic	<ul style="list-style-type: none"> • Grievance records
10.2	Number of traffic accidents or incidents (all categorized separately)	Zero traffic incident, accident or near miss	<ul style="list-style-type: none"> • Incident/Accident/Near Miss records
10.3	Number of non-compliances regarding the general traffic arrangement, traffic safety or traffic signs (all categorized separately)	Full compliance	<ul style="list-style-type: none"> • Site audits and Visual observations • Non-compliance records
10.4	Participation rate of all employees to the traffic-related training sessions	100% of all employees are given the traffic trainings	<ul style="list-style-type: none"> • Training records
10.5	Presence and availability of the necessary certification of the heavy vehicle operators	100% of the heavy vehicle operators have necessary certification	<ul style="list-style-type: none"> • Training and certification records
10.6	Presence and availability of fire extinguishers and first aid kits in the vehicles	100% of the vehicles have fire extinguisher and first aid kit	<ul style="list-style-type: none"> • Visual observation
10.7	Number of penalties regarding this TMP	Zero penalties/violation for the non-compliance of this TMP	<ul style="list-style-type: none"> • Penalty records
11	Contractor/Supplier Management		
11.1	Number of non-compliance with the requirements of this plan	Periodic decrease in the numbers of noncompliance (monthly)	<ul style="list-style-type: none"> • Records of inspections and audits
11.2	Presence of selection criteria of the Contractor/Suppliers	Contractor/Supplier having its own selection criteria is preferable.	<ul style="list-style-type: none"> • Selection criteria of the Contractor
11.3	Presence of the necessary ESHS compliance provisions and clauses in the SoW	All ESHS compliance related provisions are included in the SoW.	<ul style="list-style-type: none"> • Review of the SoW before contract signing
11.4	Number of CPA performed by the Contractor and subcontractors/Suppliers	All non-compliances are closed by implementing CPAs.	<ul style="list-style-type: none"> • CPA records

No	KPI	Target / Goal	Monitoring Tool
11.5	Number of internal audits to inspect the Contractors and subcontractors/Suppliers	All contractors fully comply with this Plan and other management plans	<ul style="list-style-type: none"> • Audit records • Labor Audit Control Form
11.6	Presence of all necessary ESHS and labor documents kept within Contractor/Suppliers	All necessary ESHS and labor documents are kept by the Contractor	<ul style="list-style-type: none"> • Documentation review and check
12	Labor Management		
12.1	Number of workers (including contractors and subcontractors)	All workers are registered and above the age of 18.	<ul style="list-style-type: none"> • Employment records and work contracts
12.2	Percent of the female employees	Increasing the female employment as much as possible	<ul style="list-style-type: none"> • Employment records
12.3	Percent of the local employees	Increasing the local employment as much as possible	<ul style="list-style-type: none"> • Employment records
13	Stakeholder Engagement, Consultations and Grievance Mechanism		
13.1	Number of planned and/or unplanned stakeholder engagement or consultation activities	Regular engagement with the internal and external affected parties	<ul style="list-style-type: none"> • Stakeholder engagement records • Consultation records
13.2	Number and types of grievances	All internal and external grievances are recorded and followed up until it is closed.	<ul style="list-style-type: none"> • Grievance records and database/log
14	Cultural Heritage		
14.1	Number of chance finds	No cultural heritage asset is damaged due to the project activities.	<ul style="list-style-type: none"> • Chance Find records and notifications
15	Biodiversity Management		
15.1	Percent of employees who received training on the conservation of biodiversity	No unnecessary harm is given to biodiversity elements, all employees are trained on this issue (%100).	<ul style="list-style-type: none"> • Training records
15.2	Number of fauna species harmed at the project site	Zero fauna species harmed due to the project activities	<ul style="list-style-type: none"> • Incident/Accident records
15.3	Compliance and continuity of the ornithological and wildlife monitoring studies	Full compliance	<ul style="list-style-type: none"> • Ornithological Evaluation Reports

8. TRAINING AND REPORTING

Within the scope of the Project, all personnel will be given environmental and social induction training before starting the job. The environmental and social induction or orientation training will include at least the following subjects:

- Waste management and safe waste storage

- Efficient water use and wastewater management
- Chemical storage and spill kit usage
- Noise and air quality management
- Traffic safety and traffic rules specific to the site
- Security measures at the site
- Code of Conduct
- Cultural features of the local communities and how to interact with them (if deemed necessary)
- Emergency preparedness and response
- Cleaning and hygiene at the site
- GBV and SEA/SH
- Disciplinary procedures and general site rules
- Internal GM.

Together with the above-mentioned E&S training, all personnel will be given the necessary basic Occupational Health and Safety (OHS) training as well. Moreover, relevant personnel will be given the job-specific trainings and daily toolbox trainings/talks.

In training, own resources and examples will be used as much as possible. Apart from this, on-the-job toolbox training will also be provided. Trainings will be recorded with the Training Registration forms.

All trainings, grievances, inspection reports, accident/incident/near misses, and other forms, checklists, etc. will be kept recorded within the scope of the Project to monitor the project E&S performance.

A monthly report, including all environmental, social, health and safety aspects mentioned within this ESMP and other sub-management plans/procedures, KPIs, trainings, and other types of records/registers, will be prepared every month during construction and operation and will be presented to the senior management. The HSE responsible will prepare these reports and submit them to the Project Manager. It will be shared with senior management after the Project Manager's review. During reporting, the HSE responsible will receive reports from subcontractors regarding their work and include them in his own report.

During the audits to be carried out by third-party consultants, separate reporting will be made and shared with the Project Coordinator.

In addition, six-monthly Environmental and Social Monitoring Reports during the construction phase and annual Environmental and Social Monitoring Reports during the operation phase will be prepared and submitted to the credit institution.