



**Kocaeli Hastane Yatırım ve Sağlık
Hizmetleri A.Ş. (Kocaeli or SPV)**

**Kocaeli Integrated Health Campus Project
(KİP)**

DOCUMENT NUMBER:

KİP-ESMS-TRN-001

DOCUMENT TITLE:

TRAINING MANAGEMENT PLAN – FINAL

REV	DATE	PAGES	DESCRIPTION	PRPD	CHKD	OWNER	CLIENT

APPROVED

TRAINING MANAGEMENT PLAN

PURPOSE SCOPE

This Management Plan has been developed in accordance with SPV policies, the commitments undertaken by SPV in the ESA, Turkish regulatory framework, IFC Performance Standards, IFC General and Sector Specific EHS Guidelines, EBRD Performance Requirements, OPIC Environmental and Social Policy Statement and EDC. Where no national regulation or international standard/guideline applies, it considers the adoption of Good International Industry Practices (GIIP).

The purpose of this plan is to provide the general approach for developing and implementing a thorough training and awareness program on the management of environmental, social, occupational health and safety issues to relevant parties involved in the Project during the Construction phase.

It includes guidelines and minimum requirements for EPC Contractor for defining its own procedure appropriate to the nature and scale of the Project Construction phase.

APPLICATION

This Management Plan applies to the Project Construction phase only; the Operation phase aspects will be addressed in separate documents. It applies to construction work activities under the control of SPV, of EPC Contractor and Subcontractors and to all KIP employees.

DEFINITIONS

Kocaeli or SPV:	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Kocaeli Integrated Health Campus Project (or "KIP" or simply "Project"):	Kocaeli Integrated Health Campus Project, being executed by SPV or its affiliates
EPC Contractor (or simply EPC):	Gama -Türkerler Kocaeli Adi Ortaklığı & Gama Türkerler Dubai
Site Management:	All key managerial roles involved in the Construction Site management, mainly referring to the EPC Contractor's personnel.
Environmental and Social Management System (ESMS)	The complete set of documents (including but not limited to: policies, manuals, plans, procedures, work instruction and records) developed to address, manage, monitor, audit and review the environmental, social, health and safety aspects of the KIP, aimed at mitigating potential ESHS risks and impacts and improving ESHS performance.
Guidelines to EPC Contractor	Guidelines to EPC for the development of its own ESMS and associated EPC Contractor Procedures appropriate to the nature and scale of the Project are contained in SPV ESMS documentation. SPV ESMS documentation, identify also minimum requirements and specific responsibilities for EPC Contractor in line with the EPC contract.
Construction Site:	The Construction Site includes all areas impacted in any manner by the construction activities.
Environmental and Social Management Plans (ESMPs)	Plans issued by SPV addressing significant Environmental and Social aspects (as identified in the ESA) by defining specific management methods, mitigation measures, monitoring activities, reporting, auditing and review.
EPC Contractor Procedure	A procedure to be prepared by EPC, to be used by EPC to describe how the mitigation and monitoring measures/actions outlined in SPV ESMPs are actually implemented.

TRAINING MANAGEMENT PLAN**ACRONYMS**

KİP	Kocaeli Integrated Health Campus Project
SPV	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Golder	Golder Associates Turkey Ltd. Şti.
BAT	Best Available Technology
CRD	Community Relation Department
CRO	Community Relation Officer
EBRD	European Bank for Reconstruction and Development
EDC	Export Development Canada
EHS	Environmental, Health and Safety
EPC	Engineering Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ES	Environmental and Social
ESHS	Environmental, Social Health and Safety
ESA	Environmental and Social Assessment
ESMP(s)	Environmental and Social Management Plan(s)
ESMS	Environmental and Social Management System
ESAP	Environmental and Social Action Plan
EU	European Union
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
HRD	Human Resources Department
HRM	Human Resources Manager
HS (or OHS)	(Occupational) Health and Safety
IFC	International Finance Corporation
ISO	International Organization for Standardization
KPI	Key Performance Indicators
OHSAS	Occupational Health and Safety Assessment Scheme
OPIC	Overseas Private Investment Corporation
PR	Performance Requirement (issued by EBRD)
PS	Performance Standard (issued by IFC)
QRA	Quantitative Risk Analysis
SEP	Stakeholder Engagement Plan
WHO	World Health Organization

TRAINING MANAGEMENT PLAN**TABLE of CONTENTS**

PURPOSE SCOPE	1
APPLICATION	1
DEFINITIONS	1
ACRONYMS	2
1.0 PURPOSE AND SCOPE OF THE PLAN	4
2.0 BACKGROUND POLICIES AND STANDARDS	6
2.1 <i>National standards and regulations</i>	6
2.2 <i>International standards</i>	6
2.3 <i>Source documents</i>	7
3.0 ROLES AND RESPONSIBILITIES	7
3.1 <i>EPC Contractor & Subcontractors</i>	7
3.2 <i>SPV</i>	7
4.0 MANAGEMENT METHODS	8
4.1 <i>Identification of Training Needs for the Workforce</i>	9
4.2 <i>Planning</i>	12
4.3 <i>Training execution</i>	13
4.4 <i>Learning verification</i>	14
4.5 <i>Specific Training Methods and Mitigation measures</i>	14
5.0 AUDIT AND REVIEW	18
6.0 REPORTING	19

TRAINING MANAGEMENT PLAN

1.0 PURPOSE AND SCOPE OF THE PLAN

This Management Plan has been developed in accordance with SPV policies, the commitments undertaken by SPV in the ESA, Turkish regulatory framework, IFC Performance Standards, IFC General and Sector Specific EHS Guidelines, EBRD Performance Requirements, OPIC Environmental and Social Policy Statement and EDC. Where no national regulation or international standard/guideline applies, it considers the adoption of Good International Industry Practices (GIIP).

The purpose of this plan is to provide the general approach for developing and implementing a thorough training and awareness program for all the workers of the KIP (including SPV, EPC Contractor and Subcontractors) within the ESMS framework on the following matters: environmental, social, occupational health and safety.

The awareness program is related to the general understanding of the requirements set out in the documentation of SPV ESMS (including policies, management plans, monitoring plans and procedures).

The training program is related to specific tasks that workers have to carry out in relation to the requirements set out in the documentation of SPV ESMS and in particular in relation to OHS aspects as specifically requested by Turkish regulation.

This Plan has been structured in accordance with main requirement set out in the ISO14001 and OHSAS 18001 standards respectively for environmental management systems and occupational health and safety management systems and addresses as well requirements set out in IFC PS1 and EBRD PR1.

The plan defines the minimum requirements for:

- identification of training needs
- planning of required training to the workforce
- delivery of planned training to the workforce
- evaluation of effectiveness of training courses.

This plan includes guidelines and minimum requirements for EPC Contractor for defining:

- its own training and awareness procedure(s) appropriate to the nature and scale of the Project Construction phase; and
- its own training and awareness program(s) dedicated to its employees and to Subcontractors' employees.

This Plan has to be read in conjunction with the ESMS documentation listed below:

TRAINING MANAGEMENT PLAN

Document ID	Document Title
KIP-ESMS-POL-001	Kocaeli Environmental, Health, Safety, Social and Human Resources Policy
KIP-ESMS-HAZ-001	Kocaeli Hazardous Material Management and Monitoring Plan
KIP-ESMS-WAM-001	Kocaeli Waste Management Plan
KIP-ESMS-WWM-001	Kocaeli Waste Water Management Plan
KIP-ESMS-AIR-001	Kocaeli Air Quality Management Plan
KIP-ESMS-NOM-001	Kocaeli Noise and Vibration Management Plan
KIP-ESMS-TRA-001	Kocaeli Traffic Management Plan (including measures for residents)
KIP-ESMS-CCM-001	Kocaeli Construction Camp Management and Monitoring Plan (including workers accommodation)
KIP-ESMS-EMP-001	Kocaeli Employment and Procurement Management Plan
KIP-ESMS-EPR-001	Kocaeli Emergency Preparedness and Response Plan
KIP-ESMS-SPL-001	Kocaeli Spill Response Plan
KIP-ESMS-GRM-001	Kocaeli Grievance Mechanism Procedure
KIP-ESMS-LST-001	Kocaeli Labour's Safety and Training Record Keeping Procedure
KIP-ESMS-LAI-001	Kocaeli Labour's Accident and Incident Record Keeping Procedure
KIP-ESMS-PRK-001	Kocaeli Performance Record Keeping Procedure
KIP-ESMS-CHS-001	Kocaeli Community Health and Safety Plan

TRAINING MANAGEMENT PLAN**2.0 BACKGROUND POLICIES AND STANDARDS**

This section includes the policies, standards and requirements of reference for this plan that are applicable, but not limited to, for the Project during Construction phase.

A number of qualitative performance parameters have been identified in section 4 below, derived from ESA commitments, Turkish regulation, IFC Performance Standards, EHS Guidelines, EBRD Performance Requirements, OPIC Environmental and Social Policy Statement and EDC as well as from GIIP.

2.1 National standards and regulations

TITLE	Turkish Reg. Gaz. Date
Labor Act (Turkey) - Law No. 4857, 22.05.2003	25134, 10/06/2003
Law on Occupational Health And Safety - Law No. 6331, 20/06/2012	28339, 30/06/2012
Regulation on Procedures and Principles of Health and Safety Training for Employees	28648, 15/05/2013
Regulation on Occupational Safety Specialist Duties, Powers Responsibilities and Training	28512, 29/12/2012

2.2 International standards

Source	Document Title
The Equator Principles Association	The Equator Principles, June 2013
IFC - International Finance Corp.	IFC Performance Standards (PS) and Guidance Notes GN
IFC - International Finance Corp.	IFC PS1 : Assessment and Management of Environmental and Social Risks and Impacts
IFC - International Finance Corp.	IFC PS2 : Labor and Working Conditions
IFC - International Finance Corp.	IFC PS3 : Resource Efficiency and Pollution Prevention
IFC - International Finance Corp.	IFC PS4 : Community Health, Safety, and Security
IFC - International Finance Corp.	IFC General EHS Guidelines: Environmental
IFC - International Finance Corp.	IFC General EHS Guidelines: Occupational Health and Safety
IFC - International Finance Corp.	IFC General EHS Guidelines: Community Health and Safety
IFC - International Finance Corp.	IFC General EHS Guidelines: Construction and Decommissioning
EBRD - European Bank for Reconstruction and Development	EBRD PR 1 - Assessment and Management of Environmental and Social Impacts and Issues
EBRD - European Bank for Reconstruction and Development	EBRD PR 2 - Labour and Working Conditions
EBRD - European Bank for Reconstruction and Development	EBRD PR 3 - Resource Efficiency and Pollution Prevention and Control
EBRD - European Bank for Reconstruction and Development	EBRD PR 4 – Health and Safety
OPIC - Overseas Private Investment Corporation	OPIC Environmental and Social Policy Statement
International Organization for Standardization	ISO 14001:2004 - Environmental management systems - Requirements with guidance for use

TRAINING MANAGEMENT PLAN

Source	Document Title
OHSAS Project Group	OHSAS 18001 - Occupational health and safety management systems - Requirements

2.3 Source documents

This section presents source documents, i.e. documents where SPV commitments are sourced from and that are the trigger for the development and implementation of the ESMPs and in general of the ESMS documentation. They are in turn based on Turkish regulatory framework, EBRD Performance Requirements, IFC Performance Standard and Guidelines and OPIC Environmental and Social Policy Statement.

Document ID	Document Title
ESA Report	Environmental Social Assessment (January, 2016)
KIP-ESMS-SEP-001	SEP - Stakeholder Engagement Plan (January, 2016)

3.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are outlined below.

3.1 EPC Contractor & Subcontractors

EPC Contractor has to ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Plan.

EPC Contractor have to ensure the effective implementation of this plan by issuing its own Management Procedures addressing, detailing and customizing specific actions, measure activities under EPC Contractor's responsibility. The EPC Contractor Procedure has to include a description of allocated resources, responsibilities and communication procedures to relevant personnel.

EPC Contractor has to ensure that action/measures directly under EPC Contractor responsibilities are carried out timely and adequately according to Procedure requirements.

EPC Contractor has to provide relevant records to SPV as indicated in section 6 "Reporting" of this plan.

If any Subcontractor is involved, it is responsible for duly implementing requirements included in EPC Contractor Procedures under the EPC Contractor supervision.

3.2 SPV

SPV Management has to ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SPV's responsibility. SPV Management is responsible for:

- Plan final approval;
- Training and awareness program final approval;

TRAINING MANAGEMENT PLAN

- taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on HSE Manager proposed approach.

SPV HSE Manager is responsible for:

- ensuring that this Plan is up to date and appropriate to the nature and scale of the KIP and ensuring that this Plan is implemented effectively by EPC Contractor;
- ensures that the ESHS training program is in place;
- ensuring that action/measures directly under SPV responsibilities are carried out timely and adequately according to Plan requirements;
- proposing to SPV Management, if necessary, amendments and/or updates to this Plan and issuing plan revisions;
- programming inspections and audit activities to ensure the correct implementation of this Plan and of EPC Contractor Procedure;
- addressing Non-Conformities through the definition of Preventive/Corrective actions;
- bringing major Non-Conformities immediately to the attention of SPV Management, to stakeholders and to the Lenders;
- collecting, organizing and reviewing monitoring data and performance monitoring reports and providing summary results of such reports to SPV Management.

The SPV HSE Manager ensures that training program (for health and safety) aspects is implemented with the support of company Doctor and that safety personnel under his control have the required training.

The SPV HSE Manager ensures that training program (for environmental aspects) aspects is implemented and that personnel under his control have the required training.

Both HSE Managers coordinate the training for the Site inspectors and develop, assist and conduct on-Site orientation and training for all levels of personnel.

4.0 MANAGEMENT METHODS

The training of SPV's and EPC Contractors' workers is a systematic process that is based on the performance of periodic training courses and awareness activities, planned according to a Training and Awareness Program which will be prepared by SPV.

SPV and EPC Contractor ensures that adequate training is provided to all Project employees and managers, ensuring that:

- Personnel is aware of the importance of developing and implementing SPV and EPC Policies and EMPs and procedures and fulfilling requirements therein and that failure in fulfilling these

TRAINING MANAGEMENT PLAN

requirements may lead to significant impacts to the Environment, to community and to KİP workers;

- Personnel with direct responsibility for the Project's environmental, social, health and safety performances have the knowledge, skills, and experience necessary to perform their work, including current knowledge of the applicable laws, regulations and requirements of international standards (IFC, EBRD etc.);
- Personnel possess the knowledge, skills, and experience to implement the specific measures and actions required under the ESMS and the methods to perform such actions in a competent and efficient manner.

This section addresses the single steps of the training process:

- identification of training needs;
- planning of required training to the workforce;
- delivery (or execution) of planned training to the workforce; and
- evaluation of effectiveness of training courses.

It provides also specific instruction for developing and maintaining an updated training program, under the responsibility of HSE department with the support of the HR department and if need with the support of specialized training contractors.

4.1 Identification of Training Needs for the Workforce

Training needs related to ESHS matters are primarily assessed by HSE department in collaboration with HR department, taking into account the following:

- All Project employees and managers need to be aware of the main requirements of the SPV ESMS and therefore have to attend a training course providing general information regarding the purpose, scope and main requirements of the ESHS policies and of the ESMPs;
- Top management has to be knowledgeable of main processes of the ESMS and in particular regarding auditing and management review processes; HSE Manager identifies training needs for the top management;
- HSE department staff has to be competent and knowledgeable regarding ESHS Turkish regulations, international standards and GIIPs (with potentially different levels of detail);
- Auditors and inspectors have to receive adequate and detailed training on the ESMS documentation requirements and related to auditing and inspecting techniques;
- Project employees that have specific task defined under the ESMS documentation (ESMPs, procedures, monitoring plans and work instructions) have to be competent and knowledgeable regarding the specific matter concerned; if a competence gap is identified, they have to attend specific training courses;

TRAINING MANAGEMENT PLAN

- Employees' and managers' competence gaps are identified by the related Manager/supervisor and are communicated by HSE department and evaluated by the HSE department with the support of HR department;
- All workers have to attend OHS training courses as required by Turkish regulation;

Assessment of competence gaps is carried out by all managers/supervisor that have the responsibility of supervising/directing the work of a number of employees based on the above considerations. This assessment is carried out:

- At least on an half annual basis before the issuing of the training program update, on specific request of the HR department;
- When new or changed regulations comes into force or when new or changed ESMS policies/plans/procedures are issued, as communicated by the HSE Manager;
- On an ongoing basis when the following circumstances may occur; recently hired employees or employees' role changes;
- On the basis of the internal and external audits outcomes.

After having assessed the gaps (following specific request or when the above circumstances have occurred) Managers/supervisors communicate to HSE department actual training needs. The managers/supervisors are encouraged to ask the support of HSE and HR departments for the assessment of the competence gaps and training needs.

Specific provisions for OHS training

Provision of training to the employees is one of the methods for minimizing the workplace hazards and illness.

Definitive sources for the identification of training needs for the workforce are:

- The results of risk assessment where required training to be provided to the workers is identified as a risk/hazard minimization measure;
- Statutory and Corporate requirements: Training must be developed and presented for those employees who perform specific types of work including occupational health and safety critical works in accordance with Turkish Legislation, and SPV corporate requirements;
- Safety Data Sheets;
- Near miss and incident/accident recording, investigations, trends etc.

During the process of selecting new or replacement employees, the manager/supervisor will assess required competencies and OHS training needs.

All personnel will receive an initial orientation for the project site and offices at which they are to be employed or for which they require regular access.

TRAINING MANAGEMENT PLAN

A basic occupational training program and specialty courses will be provided, as needed, to ensure that workers are oriented in relation to the specific hazards of individual work assignments and tasks.

Training will be provided to management, supervisors, workers, interns and occasional visitors to areas of risks and hazards.

Following non-exclusive list of training topics is given as the minimum training requirements for a construction site:

- **General OHS Trainings**
 - OHS orientation training for all employees consisting of basic hazard awareness, site specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate, any site-specific hazard or colour coding in use;
 - New employee training on the basic site rules of work at / on the site and of personal protection and preventing injury to fellow employees;
 - A visitor orientation and control program ensuring visitors do not enter hazard areas unescorted;
 - Emergency response training for all employees;
 - Use of PPE;
 - Safety Data Sheet;
 - Workplace hygiene;
 - Risk assessment;
 - Health awareness on transmissible diseases for all employees especially the ones who are staying in the construction camp.
- **Specific OHS Training**
 - Release/spill prevention;
 - Inspection and maintenance;
 - First aid and rescue training for dedicated personnel;
 - Detailed/specific training to the emergency response team(s);
 - Safe operation of specialized vehicles such as forklifts, including safe loading/unloading, load limits;
 - handling of flammable materials;

TRAINING MANAGEMENT PLAN

- Hazardous material handling including hazardous wastes;
- Chemical Handling;
- Biological hazards;
- Permit to work;
- Confined space entry;
- Welding;
- Lifting and materials handling;
- Any site-specific hazard or colour coding;
- Working at height safety;
- Use of PPE for specific tasks (oxygen masks for confined space entry, safety belt for working at height);
- Trainings for the specific workplace hazards: ex: hand tools, electrical safety, hot weather, welding hazards;
- Specific hazards & risk related to work activities; and
- Scaffold and Ladder Safety.

4.2 Planning

The HSE department with the support of HR department, based on the training needs assessment carried out by Managers/supervisors, issues on annually basis a Training and awareness program.

The training and awareness program is updated ongoing by the HSE department:

- training needs identified and communicated by managers supervisors;
- specific training needs;
- SPV management identify specific training need during Management review process;
- When new or changed regulations come into force based on judgment of HSE Manager;
- On the basis of the internal and external audits outcomes.

The training program contains:

- Training course ID and title;
- Specific training objectives;

TRAINING MANAGEMENT PLAN

- Employees/departments to be trained;
- Schedule for the delivery of training courses and duration;
- Assigned trainers (internal and/or external).

4.3 Training execution

HSE department communicates to the employees/managers needing training the planned date for the courses and their objectives in advance ensuring that people can actually attend to the courses and there are no overlaps with other duties; this will be obtained also coordinating with all the managers. Planning should also consider backup courses for people that could not attend in the first planned dates.

HRD is responsible for providing adequate location and tools (projectors, boards, etc.) at the planned dates of the training courses.

HSE department is responsible for the delivery of the training sessions relying on internal resources (e.g. from the HSE staff) or on specialized training contractors; the choice of the trainers is responsibility of the HSE Manager and have to be based on trainer qualification.

The trainer will provide training material such as presentations to be projected, papers documents to be distributed etc. HSE department keep all training materials as record.

All the trainings courses completed and attendees' participation are recorded using the "Training/awareness Participation Form" which is presented Appendix 2 of the Labour's Safety and Training Record Keeping Procedure (KIP-ESMS-LST-001). The training participation form is provided before the start of the course to the trainer by the HSE department and it is collected at the end by the HSE department together with training materials (e.g. presentations shown, paper material distributed). It contains:

- Training course ID
- Date of the training course
- Training course location
- Duration in hours
- Title and short description of training subject and reference to the training material (to be filled by the trainer)
- Name of trainer and signature
- The means to determine whether the training program is effective/learning verification
- A list with the names of employees/manager that attended the course, their role and signature

TRAINING MANAGEMENT PLAN

4.4 Learning verification

The trainer in agreement with HSE Manager decides whether a learning verification is advisable and, in case, prepare all the arrangements for the planned verification. The learning verification can be conducted using the following means:

- Questionnaires with open and/or closed questions;
- Workgroups
- Interviews.

HSE department may decide to distribute questionnaires for training/trainer evaluation at the end of the course.

4.5 Specific Training Methods and Mitigation measures

The following table details the management methods and mitigation measures/actions identified to address the training needs of the workforce in the Construction phase.

For each method and measure/action identified, the table shows:

- The identification code (ID);
- the reference (or source) documents (i.e. ESA, Turkish regulations, permits, IFC Performance Standards and EHS Guidelines, EBRD Performance Requirements and OPIC or other GIIP);
- frequency/timing of the measure/action, as applicable;
- Key Performance Indicator (KPI), if applicable, and related quantitative target or qualitative acceptance criteria;
- the related responsibility for implementing the measure/action.

For the measures actions where no KPI can be identified the cells reports "n.a." (not applicable). In this case an on/off acceptance criteria will apply; in other words the acceptance criteria set is a qualitative one, such as "the measure/action has been implemented effectively".

TRAINING MANAGEMENT PLAN

ID.	Source doc.	Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
Management controls						
TRN-01	Law No. 6331, 20/06/2012 IFC PS4 EBRD PR4 § 3	The employer will have a duty to ensure the safety and health of workers in every aspect related to the work including provision of training and communication to the employees.	ongoing	% of employees trained	100% of employees trained on the relevant topics	SPV/EPC Contractor
TRN-02	Law No. 6331, 20/06/2012 IFC PS4 EBRD PR4 § 10	Employers ensure that employees take the OHS trainings . These trainings will especially consist of pre-task trainings, trainings in case the job or the equipment changes or different technology is applied. The trainings are repeated with the changing work environment and occurring new risks. The trainings are repeated when required and in routine intervals. Employers consult with the employee representative on the planning of the OHS trainings .	ongoing	% of employees trained	100% of employees trained on the relevant topics	SPV/EPC Contractor
TRN-03	Law No. 6331, 20/06/2012 IFC PS4 EBRD PR4 § 10	Employees' representatives will be entitled to appropriate training.	ongoing	% of Employees' representatives trained	100% of Employees' representatives on the relevant topics	SPV/EPC Contractor
TRN-04	Law No. 6331, 20/06/2012	On the conditions when there are statutory (legal) requirements for occupational trainings for dangerous and very dangerous works, the workers without certification on such trainings, cannot start working.	ongoing	n.a.	Employees have all statutory (legal) trainings	SPV/EPC Contractor
TRN-05	Law No. 6331, 20/06/2012	Employees who have had occupational accident or disease will receive additional training on reasons for the accident or disease, ways to protect themselves and safe working methods. Furthermore; workers who are away from work for any reason for more than six months will receive refresher training before return to work	ongoing	% of employees trained	100% of employees trained on the relevant topics	SPV/EPC Contractor

TRAINING MANAGEMENT PLAN

ID.	Source doc.	Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
TRN-06	Law No. 6331, 20/06/2012	Employer will make sure the workers under temporary work relations (i.e. subcontractors) take the necessary trainings on the OHS risks .	ongoing	% of employees trained	100% of employees trained on the relevant topics	SPV/EPC Contractor
TRN-07	IFC-EHS GL: OHS IFC PS4 EBRD PR4	Provisions should be made to provide OHS orientation training to all new employees to ensure they are apprised of the basic site rules of work at / on the site and of personal protection and preventing injury to fellow employees.	ongoing	% of employees trained	100% of employees trained on the relevant topics	SPV/Contractor
TRN-08	IFC-EHS GL: OHS IFC PS4 EBRD PR4	Minimize the hazard through design of safe work systems and administrative or institutional control measures. Examples include job rotation, training safe work procedures, lock-out and tag-out, workplace monitoring, limiting exposure or work duration, etc.	ongoing	% of employees trained	100% of employees trained on the relevant topics	SPV/EPC Contractor
TRN-09	Regulation on Procedures and Principles of Health and Safety Training for Employees GIIP	Promote ESHS policies through training , supervision, regular reviews and consultation. In particular develop and implement a Training and awareness program in order to make all employees and managers aware of the main requirements of the ESMS	ongoing	% of employees trained	Training and awareness program developed and implemented	SPV/EPC Contractor
TRN -10	Law No. 6331, 20/06/2012	The trainings are repeated with the changing work environment and occurring new risks. The trainings are repeated when required and in routine intervals.	ongoing	Training Records	Full compliance with legislation	SPV/EPC Contractor

TRAINING MANAGEMENT PLAN

ID.	Source doc.	Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
TRN-11	IFC-EHS GL: OHS IFC PS4 EBRD PR4	<p>Companies should hire contractors that have the technical capability to manage the occupational health and safety issues of their employees, extending the application of the hazard management activities through formal procurement agreements.</p> <p>The employer should ensure that workers and contractors, prior to commencement of new assignments, have received adequate training and information.</p> <p>Training activities for employees and visitors should be adequately monitored and documented (curriculum, duration, and participants). Emergency exercises, including fire drills, should be documented adequately. Service providers and contractors should be contractually required to submit to the employer adequate training documentation before start of their assignment.</p>	ongoing	Training records, certificates on statutory trainings	Full compliance the requirement	<p>EPC Contractor will submit the training and certification records to SPV.</p> <p>SPV will keep the records of the training for SPV employees.</p>

TRAINING MANAGEMENT PLAN

5.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal and external inspections and audits to be carried out according to the requirements included in "ESMS Manual".

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that will be developed and updated by SPV HSE Department.

Internal auditing will address:

- the correct implementation of this Management Plan;
- the correct development and implementation of EPC Contractor Procedure;
- The correct and timely implementation of a Training and awareness program by EPC Contractor;
- each of the point indicated in the tables in section 4 (monitoring/measurements) of this plan.

Specific prescriptions regarding the audit activities of this plan are given below:

- determine if all required trainings are delivered to the employees;
- verify if training courses are repeated on defined intervals;
- verify if all mandatory (by law) trainings are taken by the employees;
- verify the availability of an updated training plan;
- determine if the effectiveness of the trainings is verified when planned.

Evidences and results of the inspection and audit activities are included in the audit reports and in the "Non-Conformity and Preventive/Corrective actions" records.

SPV Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary according to the indications included in "Management Review" Section of the ESMS Manual.

TRAINING MANAGEMENT PLAN

6.0 REPORTING

Evidences of the implementation of the actions/measures (detailed in section 4 of this plan) and related results are collected through inspection and auditing activities as detailed in section 5 “Audit and Review” of this plan; these evidences are described in the audit reports.

Reporting activities for this procedure is mainly related to the records of the trainings.

- Record all completed training courses and present them to the SPV (EPC Contractor);
- Record all completed trainings courses (SPV).

These data together with the results of the inspection and audit activities will be summarized in a Report on a six monthly basis that will be made available to stakeholders which is under the responsibility of SPV. This report constitutes the basis for the monitoring report to be available for the Lenders.