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EMPLOYMENT AND PROCUREMENT MANAGEMENT PLAN**PURPOSE SCOPE**

This Management Plan has been developed in accordance with SPV policies, with the commitments undertaken by SPV in the ESA, with Turkish regulatory framework, with IFC Performance Standards, IFC EHS General and Sector Specific Guidelines, EBRD Performance Requirements, OPIC Environmental and Social Policy Statement and EDC. The purpose of the plan is to increase the Project's local content by maximizing the local procurement for businesses and the local employment for unskilled and semiskilled workforce and make sure that there is non-discriminatory, transparent, open to all and fair recruitment process during the site construction phase. Moreover, is to protect of the fundamental rights of workers.

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

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 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.

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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.

ACRONYMS

KIP	Kocaeli Integrated Health Campus Project
SPV	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Golder	Golder Associates Turkey Ltd. Şti.
BAT	Best Available Technology
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
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
GIIP	Good International Industrial Practices

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EMPLOYMENT AND PROCUREMENT MANAGEMENT PLAN**1.0 PURPOSE AND SCOPE OF THE PLAN**

This Management Plan has been developed in accordance with SPV policies, with the commitments undertaken by SPV in the ESA, with Turkish regulatory framework, with EBRD Performance Requirements (in particular PR2), IFC Performance Standards (in particular PS2), IFC General and sector specific EHS Guidelines, Sector specific EHS Guidelines, OPIC Environmental and Social Policy Statement and EDC. Where no national regulation or IFC standard/guideline applies, it considers the adoption of Good International Industry Practices (GIIP).

The purpose of the plan is:

- to increase the Project's local content by maximizing the local procurement and the local¹ employment for unskilled and semiskilled workforce
- ensuring that there is non-discriminatory, transparent, open to all and fair recruitment process during the site construction phase.
- To protect of the fundamental rights of workers and to present the minimum requirements for the employment process, ensuring that:
 - workers are informed on their labor rights;
 - any agreements with worker's organizations in force is respected and compliance with national labor law is assured for any workers employed directly by the Project, EPC Contractor or Subcontractors or third parties;
 - Workers' Accommodation and camps are managed in line with IFC and EBRD specific requirements;
 - compliance with national and international requirements of Non-Discrimination and Equal Opportunity;
 - retrenchment issues are dealt with in compliance with national and international requirements;
 - compliance with requirements related to child labor and forced labor;
 - a dedicated grievance mechanism for workers is developed, disclosed and implemented.

The plan defines targets and minimum requirements of SPV workforce employment process during construction activities of KİP at İzmit, Turkey.

¹ In the context of this Project "local" is defined as residents living or businesses operating in the İzmit district and in including rural and coastal settlements that may be affected by the Project.

EMPLOYMENT AND PROCUREMENT MANAGEMENT PLAN**2.0 BACKGROUND POLICIES AND STANDARDS**

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

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

2.1 National standards and regulations

TITLE	OFF. GAZ., DATE
Labor Law	25134, 10/06/2003
Turkish Social Security Act:5510 and associated regulations on employment	26200, 16/06/2006
Law On The Work Permit For Foreigners- No 4817 and supporting regulations	25040, 06/03/2003
Regulation on Annual Leave	25391, 03/03/2004
Regulation on Jobs That Can Not Be Divided Into Weekly Workdays	25425, 06/04/2004
Regulation on the Procedures and Principles of the Employment of Children's and Young Workers	25425, 06/04/2004
Regulation on Working Hours Regarding Labor Law	25425, 06/04/2004
Regulation on Mailings Case Study	25426, 07/04/2004
Regulation on Minimum Wage	25540, 01/08/2004
Regulation on National Occupational Standards	26664, 05/10/2007
Regulation on Loss of Workforce (Capacity to Work) Ratio	27021, 11/10/2008
Regulation on Building Contractors and Construction Chiefs	27787, 16/12/2010
Regulation on Short Work Allowance	27920, 30/04/2011
Regulation on Employer penalties who do not employed Disabled and the Ex-Convict	28877, 09/01/2014
Regulation on Canteens will be Opened in the Workplace	14220, 19/06/1972
Regulation on Identity Notification Law Practice	14944, 13/07/1974
Regulation on Ship's Crew	20378, 20/12/1989
Regulation on Occupational Physician Work Approval	24970, 21/12/2002
Regulation on Foreign Investment in the Foreign Workers	25214, 29/08/2003
Regulation on Fines Deducted From the Wages of Workers	25393, 05/03/2004
Law on Occupational Health And Safety - Law No. 6331, 20/06/2012	28339, 30/06/2012

2.2 International standards

Source	Document Title
The Equator Principles Association	The Equator Principles, June 2013
IFC - International Finance Corp.	IFC PS2 and GN2 Labor and Working Condition
IFC - International Finance Corp EBRD – European Bank for Reconstruction and Development	Workers' accommodation: processes and standards A guidance note by IFC and the EBRD
IFC - International Finance Corp.	IFC General EHS Guidelines: Environmental
IFC - International Finance Corp.	IFC General EHS Guidelines: Occupational Health and Safety

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Source	Document Title
IFC - International Finance Corp.	IFC General EHS Guidelines: Construction and Decommissioning
IFC - International Finance Corp	IFC Sector Specific EHS Guidelines - Ports, Harbors, and Terminals
EBRD – European Bank for Reconstruction and Development	EBRD PR2: Labour and Working Conditions
OPIC	OPIC Environmental and Social Policy Statement
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, OPIC Policy Statement and IFC Performance Standard and Guidelines.

Document ID	Document Title
ESA Report	Environmental Social Assessment (January, 2016)

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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 Management Plan.

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

EPC Contractor has to provide relevant monitoring data and monitoring reports to SPV as indicated in section 7 "Reporting" of this plan.

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

The EPC Contractor has to establish and implement a Workers' Grievance Mechanism in line with the principles established by SPV in the Grievance Mechanism Procedure (KIP-ESMS-GMP-001) for its workers' grievances.

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:

- Management Plan and EPC Contractor plans/procedures final approval;
- Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SPV HSE Manager proposed approach.

SPV HSE Manager and HR Manager are responsible for:

- ensuring that this Plan is up to date and appropriate to the nature and scale of the KIP and ensuring that this Management Plan is implemented effectively by EPC Contractor;
- ensuring that action/measures and monitoring activities directly under SPV responsibilities are carried out timely and adequately according to this Management Plan requirements;

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- proposing to SPV Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions;
- programming inspections and audit activities to ensure the correct implementation of this Management Plan and of EPC Contractor's Plan/Procedure;
- addressing Non-Conformities through the definition of Preventive/Corrective action;
- bringing major Non-Conformities immediately to the attention of SPV Management;
- collecting, organizing and reviewing monitoring data and performance monitoring reports and providing summary results of such reports to SPV Management, to stakeholder and to Lenders.

4.0 MANAGEMENT METHODS AND MITIGATION MEASURES**4.1 General Management Criteria**

During the Construction phase of the Project temporary and permanent workforce will be employed by SPV, EPC Contractor, Subcontractors and other contractors.

The employment of the workforce will be in compliance with applicable national laws and regulations and with IFC requirements, in particular with IFC PS2 Labor and Working Conditions and with IFC/EBRD Guidance on Workers' Accommodation.

In accordance with the procurement, the primary suppliers for the Project are identified as follows:

1. EPC Contractor and main Subcontractors consisting of local and international companies
2. Major construction material and equipment suppliers composed of local and international companies
3. Companies providing outsourced services i.e. catering, cleaning mainly composed of national companies.
4. Companies such as employment agencies / or labor hire organization (if any) providing temporary and permanent workforce.

The EPC Contractor will have a fundamental role in the process of managing the supply chain and implementing mitigation measures because most part of the Primary supply chain will be contracted by the EPC Contractor. The companies directly contracted by SPV for the purpose of the project will be a limited number.

EPC Contractor will implement its own Employment and Procurement Procedure, providing details on management methods and mitigation measures in line with this Management Plan and IFC PS 2-EBRD PR

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2 and including a specific commitment to address and remedy any issue of concern in relation to IFC Standards/Guidelines – EBRD Policies and Turkish regulation requirements.

The impacts and risks associated with procurements are discussed in the followings:

- Potential suppliers must satisfy the project contractor selection requirements before being awarded any contract related to the project;
- Supplier selection procedures are designed to evaluate a potential contractor's capacity and commitment for identifying and controlling HSE risks;
- Tender evaluation procedures will evaluate the HSE performance of the supervisors assigned to the project.

The following table summarizes the risks and impacts associated with the procurement.

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SUPPLY CHAIN	IMPACTS AND RISKS			STATUS	ADDITIONAL MITIGATION MEASURES	RESPONSIBILITY
	Environmental	Occupational Health and Safety	Labor conditions			
All	Environmental pollution created by the supply chain company activities at project site			ESMS system applies to all parties operating at project sites	None	None
All		OHS risks induced by supply chain company activities at project site		ESMS system applies to all parties operating at project sites	None	None
All	Poor environmental performance			Contractor selection process considers the environmental performance of the primary suppliers. Primary suppliers with good environmental performance are selected.	Monitor the supplier environmental performance. In case of poor environmental performance consider actions to remedy including actively work with the supplier to improve its performance In case of repeated poor environmental performance, consider replacing the supplier.	SPV/EPC Contractor Each for their own direct contractors
All		Poor OHS/labor performance		Contractor selection process considers the OHS performance of the primary suppliers. Primary suppliers with good OHS/labor performance are selected.	Monitor the supplier OHS/labor performance. In case of poor OHS/labor performance, consider actions to remedy including actively work with the supplier to improve its performance In case of repeated poor OHS/labor performance, consider replacing the supplier.	SPV/EPC Contractor Each for their own direct contractors
All			Recruiting child labor at project sites	National laws have provisions for the employment of minors. However, children under the age of 18 will not be employed in hazardous work which includes the construction. All project activities will be performed in full compliance with Turkish Legislation.	None	None

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SUPPLY CHAIN	IMPACTS AND RISKS			STATUS	ADDITIONAL MITIGATION MEASURES	RESPONSIBILITY
	Environmental	Occupational Health and Safety	Labor conditions			
All			Recruiting child labor		If Project identifies any child labor and forced labor issues associated by the primary suppliers at the supply chains that are not under direct control of the Project and National authorities: Project will consider actions to remedy including replacing the supplier or identify a program for improving the performance of the primary suppliers in relation to PS2. SPV will monitor its primary suppliers chain on an ongoing basis if risks or incidents of child and/or forced labor are identified, SPV will take appropriate steps to remedy them including replacing the supplier.	SPV/EPC Contractor Each for their own direct contractors
All			Recruiting forced labor at project sites	National law strictly prohibits the forced labor in Turkey and monitored by the government. Foreign employees are subject to have permit to work. The permit is given and monitored by the government. Project will not use employment agencies for employment under normal circumstances.	In case it is essential that such agencies are sourcing for the project; the Project will ensure they are reputable such that they employ in line with Turkish legislation and ILO standards. Project will develop a primary supplier rating system (Refer to Performance Standard 2 Handbook for Labor And Working Conditions, 2010, SIA&IFC) for continuous evaluation of the primary suppliers against the IFC PS2 requirements. Project will identify a program for improving the performance of the primary suppliers in relation to PS2 and PR2 in case high risks are identified during the evaluation process.	SPV/EPC Contractor Each for their own direct contractors

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SUPPLY CHAIN	IMPACTS AND RISKS			STATUS	ADDITIONAL MITIGATION MEASURES	RESPONSIBILITY
	Environmental	Occupational Health and Safety	Labor conditions			
All			Recruiting forced labor		If Project identifies any child labor and forced labor issues associated by the primary suppliers at the supply chains that are not under direct control of the Project and National authorities: Project will consider actions to remedy including replacing the supplier or identify a program for improving the performance of the primary suppliers in relation to PS2 and PR2.	SPV/EPC Contractor Each for their own direct contractors
All	Impacts on biodiversity in case there is possibility of purchasing primary production (especially but not exclusively food and fiber commodities) that is known to be produced in regions where there is a risk of significant conversion of natural and/or critical habitats, systems.			There is no identified possibility of purchasing primary production (especially but not exclusively food and fiber commodities) that is known to be produced in regions where there is a risk of significant conversion of natural and/or critical habitats, systems.	Monitor the primary suppliers of productions In case a possibility of purchasing primary production (especially but not exclusively food and fiber commodities) that is known to be produced in regions where there is a risk of significant conversion of natural and/or critical habitats, systems is identified take actions for verification of the condition, and remedy considering to replace the supplier/production with the ones creating less impacts on such areas.	SPV/EPC Contractor Each for their own direct contractors

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SUPPLY CHAIN	IMPACTS AND RISKS			STATUS	ADDITIONAL MITIGATION MEASURES	RESPONSIBILITY
	Environmental	Occupational Health and Safety	Labor conditions			
Quarries	Poor environmental performance Impacts on biodiversity in case there is possibility of purchasing primary production (especially but not exclusively food and fiber commodities) that is known to be produced in regions where there is a risk of significant conversion of natural and/or critical habitats, systems.	Poor OHS/labor performance	Recruiting forced/child labor	National laws have provisions for the employment of minors. However, children under the age of 18 will not be employed in hazardous work which includes the construction. All project activities will be performed in full compliance with Turkish Legislation. National law strictly prohibits the forced labor in Turkey and monitored by the government. Foreign employees are subject to have permit to work. The permit is given and monitored by the government.	The quarries will be included in the audit program for the EPC Contractor. The EPC Contractor is responsible for the selection and management of quarries in relation to the project. Project will develop a primary supplier rating system (Refer to Performance Standard 2 Handbook for Labor And Working Conditions, 2010, SIA&IFC) for continuous evaluation of the primary suppliers against the IFC PS2 and EBRD PR2 requirements. Project will identify a program for improving the performance of the primary suppliers in relation to PS2 and PR2 in case high risks are identified during the evaluation process. If Project identifies any child labor and forced labor issues associated by the primary suppliers at the supply chains that are not under direct control of the Project and National authorities: Project will consider actions to remedy including replacing the supplier or identify a program for improving the performance of the primary suppliers in relation to PS2 and PR2.	EPC Contractor

EMPLOYMENT AND PROCUREMENT MANAGEMENT PLAN**4.2 Specific management methods and mitigation measures**

The following table details the management methods and mitigation measures/actions identified for management of employment 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 and permits, IFC Performance Standards and EHS Guidelines, EBRD Performance Requirements, 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”.

Provision of Workers’ accommodation is addressed in the “Construction Camp Management Plan”.

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
General aspect working conditions and terms of employment						
EMP-01	IFC PS2 §9 ESA 10.5 EBRD PR2	Workers will be provided with documented information that is clear and understandable, regarding their rights under national labor and employment law and any applicable collective agreements, including their rights related to hours of work, wages, overtime, compensation, and benefits upon beginning the working relationship and when any material changes occur.	ongoing	n.a.	Full compliance, all employees have contracts	SPV EPC Contractor
EMP-02	Labor Law, 25134, 10/06/2003	An employment contract is deemed to have been made for an indefinite period where the employment relationship is not based on a fixed term. An employment contract for a definite period is one that is concluded between the employer and the employee in written form, which has a specified term or which is based on the emergence of objective conditions like the completion of a certain work or the materialization of a certain event.	ongoing	n.a.	Full compliance, all employees have contracts	SPV EPC Contractor
EMP-03	IFC PS2 §10 Turkish labor laws and regulations EBRD PR2	Working conditions and terms of employment (e.g. wages and benefits; wage deductions; hours of work; overtime arrangements and overtime compensation; breaks; rest days; and leave for illness, maternity, vacation or holiday) set out in - collective bargaining agreement with workers' organization (if any), - Turkish labor laws and regulations have to be respected.	ongoing	n.a.	Full compliance, with agreements undertaken and law	SPV EPC Contractor
EMP-04	IFC PS2 §11 EBRD PR2	Migrant workers (if any) have to be identified and it has to be ensured that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out similar work.	ongoing	n.a.	Migrant workers identified Full compliance with	SPV EPC Contractor
EMP-05	IFC PS1 ESA 10.4 GIIP EBRD PR1	Priority will be given, to the extent feasible, to the recruitment of local workforce, in order to maximize local socioeconomic benefits.	ongoing	n.a.	Announcement of the procurement opportunities in Izmit district and other districts	SPV EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
Foreign workers						
EMP-06	Social Security Law- No 5510	<p>Provisions regarding the individuals deemed to be insurance holders as per item (a) of the first paragraph of Social Security Law will also be applicable to foreigners who work on service contract, excluding the citizens of countries with which international social security contract is entered based on reciprocity principle.</p> <p>Individuals who are sent to Turkey (if any) for a job by or on behalf of an organization established in a foreign country and who document to be subject to social insurance in the foreign country, and among the ones who work in Turkey on his/her own name and account the individuals who reside abroad and are subject to the social security legislation of that country are not deemed to be insurance holders.</p>	ongoing	n.a.	Work insurance covering all foreign workers	SPV EPC Contractor
EMP-07	Law On The Work Permit For Foreigners No 4817	Unless otherwise provided in the bilateral or multilateral agreements to which Turkey is a party, the foreigners are obliged to get permission before they start to work dependently or independently in Turkey.	ongoing	n.a.	All foreign workers having work permission before starting working	SPV EPC Contractor
Representation						
EMP-08	IFC PS2 §14 EBRD PR2	<p>Workers will not be discouraged from electing worker representatives, forming or joining workers' organizations of their choosing, or from bargaining collectively.</p> <p>Workers who participate, or seek to participate, in such organizations and collective bargaining will not be discriminated or retaliated against.</p> <p>SPV/EPC Contractor will engage with such workers' representatives and workers' organizations, and provide them with information needed for meaningful negotiation in a timely manner.</p> <p>Workers' organizations are expected to fairly represent the workers in the workforce.</p>	ongoing	n.a.	No restrictions on workers representation	SPV EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
Non-discrimination						
EMP -09	IFC PS2 §15 ESA 10.5	<p>Employment decisions will not be made on the basis of personal characteristics (such as gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation) unrelated to inherent job requirements.</p> <p>Employment relationship will be based on the principle of equal opportunity and fair treatment</p> <p>No discrimination will be made with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, and promotion, termination of employment or retirement, and disciplinary practices.</p> <p>Measures will be taken to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women.</p> <p>The principles of non-discrimination apply to migrant workers.</p>	ongoing	n.a.	Non-discrimination and equal opportunities principles met	SPV EPC Contractor
EMP-10	Labor Law, 25134, 10/06/2003	<p>No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship.</p> <p>An employee working under an employment contract for a definite period will not be subjected to differential treatment in relation to a comparable employee working under an employment contract for an indefinite period.</p>	ongoing	n.a.	Non-discrimination and equal opportunities requirements met	SPV EPC Contractor
End of Work Contract - Retrenchment						
EMP-11	IFC PS2 §18 EBRD PR2	<p>Prior to implementing any collective dismissals, an analysis of alternatives to retrenchment will be carried out.</p> <p>If the analysis does not identify viable alternatives to retrenchment, a retrenchment procedure will be developed and implemented to reduce the adverse impacts of retrenchment on workers. The retrenchment procedure will be based on the principle of non-discrimination and will reflect consultation with workers, their organizations, and, where appropriate, the government, and comply with collective bargaining agreements (if they exist).</p> <p>All legal and contractual requirements related to notification of public authorities, and provision of information to and consultation with workers and their organizations will have to be complied with.</p>	ongoing	n.a.	If the case Analysis of retrenchment carried out. Retrenchment plan in place	SPV EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
EMP-12	IFC PS2 § 19 EBRD PR2	In case, all workers will receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay and social security benefits and pension contributions and benefits will be paid (i) on or before termination of the working relationship to the workers, (ii) where appropriate, for the benefit of the workers, or (iii) payment will be made in accordance with a timeline agreed through a collective agreement. Where payments are made for the benefit of workers, workers will be provided with evidence of such payments.	ongoing	n.a.	Timely communication and all outstanding amounts paid	SPV EPC Contractor
EMP-13	Labor Law, 25134, 10/06/2003	The notice of contract termination will be given by the employer in written form involving the reason for termination which must be specified in clear and precise terms. Before terminating a continual employment contract made for an indefinite period, a notice to the other party must be served by the terminating party. The employer, who terminates the contract of an employee engaged for an indefinite period, who is employed in an establishment with thirty or more workers and who meets a minimum seniority of six months, must depend on a valid reason for such termination connected with the capacity or conduct of the employee or based on the operational requirements of the establishment or service.	ongoing	n.a.	Adequate information on contract termination	SPV EPC Contractor
Workers Grievance Mechanism						
EMP-14	IFC PS2 §20 and 26 ESA 10.4 EBRD PR2	The employer will provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The client will inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them. The mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism should also allow for anonymous complaints to be raised and addressed. The mechanism should not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.	ongoing	Grievances, recorded Grievances responded	Workers grievance mechanism in place 100% recorded 100% responded	SPV EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
EMP-15	IFC-PS2 §26 EBRD PR2	Ensure that contracted workers have access to a grievance mechanism. In cases where the third party is not able to provide a grievance mechanism the client will extend its own grievance mechanism to serve workers engaged by the third party.	Ongoing	n.a.	Grievance mechanism accessible for all Contractor's and Subcontractors workers	SPV EPC Contractor
Workers Engaged by Third Parties						
EMP-16	IFC PS2 §24-25 ESA 10.2 EBRD PR2	With respect to workers contracted by third parties a commercially reasonable effort will be taken to ascertain that the third parties are reputable and legitimate enterprises and have an appropriate ESMS that will allow them to operate in a manner consistent with the requirements of IFC PS2 and EBRD PR', except for retrenchment aspects and for supply chain aspects. Performance of third party will be monitored through audit as indicated further in this plan by both SPV and EPC Contractor. Note: - Third parties for SPV are: EPC Contractor and other contractors - Third parties for EPC Contractor are: Subcontractors	Ongoing	n.a.	Full compliance, contractors Subcontractors selection procedures in place	SPV EPC Contractor
Child labor and Forced labor						
EMP-17	IFC PS2 §21 ESA App. K EBRD PR2	No workers under the age of 18 will be employed. Therefore Turkish Regulation on the "Procedures and Principles of the Employment of Children's and Young Workers" will not apply.	At anytime	n.a.	Full compliance	SPV EPC Contractor
EMP-18	Republic of Turkey- Constitution IFC PS2 §22 ESA 10.5 EBRD PR2	No forced labor will be employed and tolerated (forced labor consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements.)	At anytime	n.a.	Full compliance	SPV EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
EMP-19	IFC PS2 §22 ESA 10.5 EBRD PR2	No trafficker persons will be employed and tolerated (Trafficking in persons is defined as the recruitment, transportation, transfer, harboring, or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation)	At anytime	n.a.	Full compliance	SPV EPC Contractor
Management Controls						
EMP-20	IFC PS1 §10 ESA 9.3 EBRD PR1	Where a control can reasonably carried out, the risks and impacts identification process will also consider those risks and impacts associated with primary supply chains , as defined in PS2 (§ 27 - 29) and PS6 (§ 30). The supplier evaluation/selection system of the EPC Contractor (i.e. Vendors and Suppliers requirements) will include specific information and conditions regarding ESHS performance.	Ongoing during suppliers selection	n.a.	Records showing supplier selection process considers the ESHS performance	SPV EPC Contractor
EMP-21	IFC PS2 §27 ESA 10.5 EBRD PR2	Where there is a high risk of child labor or forced labor in the procurement , those risks have to be identified. Particular attention will be paid to supplier from countries where there is a risk of child labor. If child labor or forced labor cases are identified, appropriate steps to remedy them will have to be taken. The procurement will have to be monitored on an ongoing basis in order to identify any significant change. If new risks or incidents of child and/or forced labor are identified, appropriate remedy steps will be taken.	Ongoing during suppliers selection	n.a.	Records showing supplier selection process considers the ESHS performance	SPV EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
EMP-22	IFC PS2 §28 EBRD PR2	<p>Additionally, where there is a high risk of significant safety issues related to supply chain workers, procedures and mitigation measures have to be introduced to ensure that primary suppliers within the supply chain are taking steps to prevent or to correct life-threatening situations.</p> <p>In particular the EPC Contractor will have to pretend from Subcontractor the same level of care in addressing OHS issues requested by SPV in the documentation of the ESMS.</p>	Ongoing during suppliers selection	n.a.	<p>Records showing supplier selection process considers the ESHS performance</p> <p>Records showing audit performed by SPV to EPC Contractor on OHS matters</p> <p>Records showing audit performed by EPC Contractor to Subcontractors on OHS matters</p>	SPV EPC Contractor
EMP-23	IFC PS2 §29 EBRD PR2	Where ESHS impacts are identified associated with a specific supplier and remedy is not possible in the short term, shift the project's procurement over time to suppliers that can demonstrate that they are complying with this IFC PS2 §27-29, PS6 §39 and EBRD PR2.	Ongoing during suppliers selection	n.a.	Records showing supplier selection process shifted to other suppliers (in case of suppliers with bad ESHS performance)	SPV EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
EMP-24	IFC PS6 §30 EBRD PR6	<p>Where SPV or EPC Contractor is purchasing primary production (especially but not exclusively food and fiber commodities) that is known to be produced in regions where there is a risk of significant conversion of natural and/or critical habitats, systems and verification practices will be adopted as part of the ESMS to evaluate its primary suppliers. The systems and verification practices will:</p> <ul style="list-style-type: none"> (i) identify where the supply is coming from and the habitat type of this area (ii) provide for an ongoing review of the primary supply chains (iii) limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion of natural and/or critical habitats (this may be demonstrated by delivery of certified product, or progress towards verification or certification under a credible scheme in certain commodities and/or locations); and where possible, require actions to shift the procurement over time to suppliers that can demonstrate that they are not significantly adversely impacting these areas. 	ongoing	n.a.	Records showing supplier selection process considers the ESHS performance	SPV EPC Contractor
Recruitment Process						
EMP-25	ESA 10.4	In case a qualified personnel is required to be recruited: SPV will give priority to employ local residents, defined as those living in the Izmit district. If the required competency cannot be found among local residents, SPV will employ workers from other parts of Turkey	ongoing	% of local workforce	To be agreed with the EPC Contractor	SPV EPC Contractor
EMP-26	GIIP	SPV and EPC Contractor will make an assessment in order to understand what work skills are available locally and what actions should be implemented to increase local employment opportunities.	ongoing	n.a.	Completion of the assessment	SPV EPC Contractor
Announcement of Job Opportunities						
EMP-27	GIIP	<p>SPV will promote local employment by providing information on the employment opportunities, on the recruitment process and on the official application channels through different local media including internet, advertisements on local newspapers, local authorities, agencies, associations and NGOs.</p> <p>Information on employment opportunities and information on the recruitment process will be provided throughout the Stakeholder Engagement process.</p>	ongoing	n.a.	Announcement of the job opportunities and recruitment process in Izmit district and other districts	SPV EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
Training & Education						
EMP-28	GIIP	Certification programs offered in conjunction with the vocational school or equivalent organization Training partnerships with local or national institutions or government agencies.	ongoing	n.a.	Implementation of the training program	SPV
Local Procurement						
EMP-29	GIIP	SPV will promote procurement from local businesses, intended as those operating in the İzmit district by providing information on procurement opportunities, services needed and qualification process through different channels including internet, advertisements on local media, local authorities, Chambers of Commerce and Trade Associations. Information on procurement opportunities and on the qualification process will be provided throughout the Stakeholder Engagement process.	ongoing	n.a.	Announcement of the procurement opportunities in İzmit district and other districts	SPV EPC Contractor

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5.0 MONITORING (MEASUREMENTS)

The following table details the monitoring (measurement) activities identified for employment and procurement in the Construction phase.

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

- The identification code (ID.)
- the reference (or source) documents (i.e. ESA, Turkish standard, permits, IFC Performance Standards and EHS Guidelines, EBRD Performance Requirements, OPIC or other GIIP)
- frequency/timing of the measurement,
- Key Performance Indicator (KPI), and related quantitative target, if the target consist of a regulatory limit this will be indicated;
- the related responsibility for implementing the monitoring activity.

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ID.	Source doc.	Monitoring Action/Measure description	Frequency/Timing	KPI	Target/ Acceptance criteria	Responsibilities
EMP-30	ESA 10.4	Employment of local workforce	Half-yearly	Number and % of local workforce	N.A. (1)	EPC Contractor to record and provide figures regarding employment of local workforce to SPV. SPV for collecting data
EMP-31	GIIP	Contracts to local businesses	Half-yearly	Number and % of local businesses contracted	N.A. (1)	EPC Contractor to record and provide figures regarding local procurement to SPV. SPV for collecting data

(1) - This processes and their results are not under complete control of SPV and EPC Contractor; therefore no acceptance criteria has been indicated.

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6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal 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 Plan/Procedure
- The correct and timely implementation of an auditing and review system by the EPC Contractor;
- Each of the point indicated in the table in section 4 (mitigation actions/measures) of this plan.

During the inspections the audit team will address in particular:

- Availability of employment records, job descriptions;
- Grievance records of employees;
- EPC Contractor and Subcontractors selection process in place.
- Two main indicator will be monitored in accordance with this Management Plan:
 - Number and % of local workforce recruited
 - Number and % of contracts awarded to local businesses
 - Specific initiative undertaken.

Evidences and results of the inspection and audit activities are included in the audit reports.

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7.0 REPORTING

Evidences of the implementation of the mitigation actions/measures (detailed in section 4 of this plan) and related results are collected through inspection and auditing activities as detailed in section 6 “Audit and Review” of this plan; these evidences are described in the audit reports.

Reporting activities for this management plan is mainly related to:

- implementation of Project employment strategies (SPV/EPC Contractor);
- Main figures regarding workers' contracts types (SPV/EPC Contractor);
- Main figures regarding information provided to workers (SPV/EPC Contractor);
- Main figures regarding the implementation of Worker's accommodation IFC/EBRD guidance (EPC Contractor);
- Main figures regarding workers' grievances and corrective actions adopted, including average time necessary for the resolution of grievances (SPV/EPC Contractor);
- Collection, aggregation and recording of the data (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.