
EMERGENCY PREPAREDNESS AND RESPONSE PLAN**PURPOSE SCOPE**

This 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 this Plan is to provide a high-level overview of the Procedures to be prepared by SPV to mitigate and control the impacts of an occupational safety or environment incident during the Construction phase. Specific Procedures will be developed by SPV and EPC Contractor to set out specific instructions to manage emergency response situations. All Procedures that will be prepared will be used in conjunction with this overarching Management Plan in the event of an emergency situation.

This Plan includes guidelines and minimum requirements for EPC for defining its own Procedures appropriate to the nature and scale of the Project Construction phase.

APPLICATION

This Plan applies to the Project Construction phase only. 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.
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.

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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
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
IFC, EBRD WA GN	Workers' accommodation: processes and standards A guidance note by IFC & EBRD
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

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EMERGENCY PREPAREDNESS AND RESPONSE PLAN**1.0 PURPOSE AND SCOPE OF THE PLAN**

This 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 PR 4), IFC Performance Standards (in particular PS 2 and PS4), IFC General EHS Guidelines, Sector Specific EHS Guidelines, 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 define the actions to be implemented for the preparedness and response for the emergency cases in compliance with the Turkish legislation and/or IFC and EBRD requirements.

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 Section 4 below, derived from ESA commitments, Turkish legislation and/or IFC, EBRD and EHS Guidelines as well as from GIIP.

2.1 National standards and regulations

TITLE	Turkish Reg. Gaz. Date
Law No. 4857 Labor Law	25134, 10/6/2003
Law No. 6331 on Occupational Health and Safety	28339, 30/06/2012
Regulation on Emergencies in Workplaces	28681, 18/06/2013
Occupational Health and Safety Risk Assessment Regulation	28512, 29/12/2012
Regulation on Personnel Protective Equipment	26361, 29/11/2006
Regulation on Health and Safety Precautions Regarding Working with Asbestos	28539, 25/01/2013
Regulation on Protection of Workers from the Risk of Explosive Media	28633, 30/04/2013
Regulation on Health and Safety Precautions Regarding Workplace Buildings	28710, 17/07/2013
Regulation on Health and Safety at Construction Sites	28786, 05/10/2013
Regulation on First Aid	29429, 29/07/2015
Regulation on Procedures and Principles of Health and Safety Training for Employees	28648, 15/05/2013
Regulation on Use of Personnel Protective Equipment in Workplaces	28695, 02/07/2013
Regulation on Health and Safety Precautions Regarding Working with Carcinogenic and Mutagenic Substances	28730, 06/08/2013
Regulation on Health and Safety Precautions Regarding Working with Chemicals	28733, 12/08/2013
Regulation on Health and Safety Signs	28762, 11/09/2013

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Source	Document Title
The Equator Principles Association	The Equator Principles, June 2013
IFC - International Finance Corp.	IFC Performance Standards
IFC - International Finance Corp.	IFC General EHS Guidelines
EBRD	EBRD Performance Requirements
OPIC	OPIC Environmental and Social Policy Statement

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 and IFC Performance Standards 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 Plan.

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

If any Subcontractor is involved, it is responsible for duly implementing requirements included in EPC Contractor Procedure under the EPC 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:

- This Plan's and EPC Contractor Procedures' final approval;
- Preparing specific Emergency Preparedness and Response Procedures;
- taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SPV HSE Manager proposed approach and actions.

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;
- ensuring that action/measures and monitoring activities directly under SPV responsibilities are carried out timely and adequately according to this 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;

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- collecting, organizing and reviewing monitoring data and performance monitoring reports from EPC Contractor and providing summary results of such reports to SPV Management, to stakeholders and to the Lenders.

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

Emergency response under this EPRP will be based upon the following PEAR principle of prioritization:

- **People:** the safety of people will be the highest priority;
- **Environment:** minimize any adverse environmental impacts that may occur from any emergency event;
- **Assets:** protection of assets or equipment from damage or loss; and
- **Reputation:** minimization of adverse impacts on the reputation.

4.2 Potential Emergency Events

Emergency situations that may arise during the Project's Construction phase and which will be covered in separate Emergency Preparedness and Response Procedures by SPV are:

- Medical emergency;
- Fire;
- Spill;
- Vehicle collision;
- Natural disasters including flooding etc.; and
- Sabotage.

4.3 Management Methods and Mitigation Measures

The implementation of Emergency Preparedness and Response Procedures will include details on the following components:

- Prevention
- Emergency Preparedness
 - Alert levels and reporting lines
 - List of key contacts (internal and external)

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- Definition of roles and responsibilities of internal teams and external organizations
- Internal and external notification and communication
- Informing the public and emergency response agencies
- External emergency services/security protocols
- Escape routes, Assembly areas, Warning devices
- Communication equipment
- Emergency equipment
- Emergency Response Teams (Search and rescue teams, First Aiders)
- Protection of vital records protocols
- Logistics
- Onsite command post
- Location of resources
- Emergency Response
 - Identification of emergency and raising alarm
 - Emergency communication protocol
 - Activation of the Emergency Response Team
 - Activation of the Emergency Preparedness and Response Plan
 - Operations shutdown
 - Locking of equipment
 - Control of energy sources
 - Location of main valves and main switches
 - Dangerous goods and hazardous materials
 - Coordination and Control
 - Site Evacuation
- Recovery and corrective action

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- Securing the site
 - All clear
 - Debrief
 - Post-incident investigation protocols
 - Internal notifications/reporting tools
 - Lessons learned review processes including management of implementation of recommendations from this plan
- Training and practice drills

The following table details the management methods and mitigation measures/actions identified for hazardous material management 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, EBRD Performance Requirements and EHS Guidelines 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;
- 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".

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ID.	Source doc.	Mitigation Action/Measure Description	Frequency / Timing	KPI	Target/ Acceptance criteria	Responsibilities
Management controls						
EPR-01	Law No. 6331, Turkish Reg. Gaz. No. 28512 of 29/12/2012, IFC- EHS GL, IFC PS2-4, EBRD PR 4	Risk Assessment: <ul style="list-style-type: none"> Hazard and risk assessment is prepared, Risk assessment is reviewed and updated annually. 	Annually	n.a.	Risk assessment developed effectively and reviewed annually	EPC Contractor
EPR-02	Law No. 6331, Turkish Reg. Gaz. No. 28512 of 29/12/2012, 28681 of 18/06/2013, 24762 of 22/05/2002, 28762 of 11/09/2013, 28710 of 17/07/2013, IFC- EHS GL, IFC PS2-4, EBRD PR 4	Emergency Preparedness and Response; <ul style="list-style-type: none"> Emergency Preparedness and Response Procedures to be prepared for medical emergency, fire, spill, vehicle collision, natural disasters and sabotage including; <ul style="list-style-type: none"> Alert levels and reporting lines Internal and external key contacts are identified Definition of roles and responsibilities of internal teams and external organizations Internal and external notification and communication protocol Informing the public and emergency response agencies External emergency services/security protocols Escape routes, Assembly areas, Warning devices Communication and emergency equipment are identified Search, rescue teams and first aiders are identified Control of energy sources, locking of equipment, location of main valves and switches, dangerous goods and hazardous materials are identified Post incident recovery and corrective action procedure is identified 	Ongoing	n.a.	All requirements are met	SPV and EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure Description	Frequency / Timing	KPI	Target/ Acceptance criteria	Responsibilities
EPR-03	Law No. 6331, Turkish Reg. Gaz. No. 28648 of 15/05/2013, IFC- EHS GL, IFC PS2-4, EBRD PR 4	Training; <ul style="list-style-type: none"> • Employees and contractors are trained on emergency response procedures. • Search, rescue teams and first aiders have specific training • Training is based around a changing set of activities and is planned and managed on a dynamic basis. • Training refreshed for emergency response team annually. 	Initial training and annual refresher training for emergency response teams	n.a.	All employees are trained for the emergency preparedness and response procedures. Search, rescue and first aid teams have specific training	SPV and EPC Contractor
EPR-04	Law No. 6331, Turkish Reg. Gaz. No. 28681 of 18/06/2013, 28648 of 15/05/2013, IFC- EHS GL, IFC PS2-4, EBRD PR 4	Emergency Drills will be conducted at least annually to review and control the implementation and effectiveness of the Emergency Preparedness and Response Procedures. Drill reports will be prepared.	Annually	n.a.	Emergency drills undertaken, reports prepared	SPV and EPC Contractor
EPR-05	Law No. 6331, Turkish Reg. Gaz. No. 28681 of 18/06/2013, 28648 of 15/05/2013, IFC- EHS GL, IFC PS2-4, EBRD PR 4	Emergency Preparedness and Response Procedures will be reviewed annually and updated as required.	Annually	n.a.	Procedures are reviewed and updated annually	SPV and EPC Contractor

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5.0 MONITORING

The following table details the monitoring (measurement) activities identified for Emergency Preparedness and Response 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 and 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
EPR-06	Law No. 6331, IFC- EHS GL, IFC PS2-4, EBRD PR 4	Number of emergencies that have triggered the emergency response are recorded in monthly HSE statistics	Ongoing	n.a.	HSE Statistics	EPC Contractor
EPR-07	Law No. 6331, Turkish Reg. Gaz. No. 28648 of 15/05/2013, IFC- EHS GL, IFC PS2-4, EBRD PR 4	Emergency Preparedness and Response training of employees and specific training for emergency response teams	Initial training and regular refreshers	Trained personnel %	90% (i.e. only motivated exceptions allowed, e.g. presence of personnel for which training is planned in the short term)	SPV and EPC Contractor
EPR-08	Law No. 6331, Turkish Reg. Gaz. No. 28681 of 18/06/2013, 28648 of 15/05/2013, IFC- EHS GL, IFC PS2-4, EBRD PR 4	Emergency Drills conducted at least annually and records are kept	Annually	n.a.	Annual drills/Drill reports	SPV and EPC Contractor
EPR-09	Law No. 6331, Turkish Reg. Gaz. No. 28681 of 18/06/2013, 28648 of 15/05/2013, IFC- EHS GL, IFC PS2-4, EBRD PR 4	Emergency Preparedness and Response Procedures are reviewed and updated annually.	Annually	n.a.	Document records	SPV and EPC Contractor

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6.0 AUDIT AND REVIEW

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

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

Internal auditing will address:

- The correct implementation of this Plan;
- The correct development and implementation of EPC Contractor Procedure;
- The correct and timely implementation of an auditing and review system by the EPC Contractor;
- Each of the point indicated in the tables in Section 4 (mitigation actions/measures) and Section 5 (Monitoring) of this Plan.

During the inspections, the audit team will address in particular:

- Emergency Preparedness and Response Procedure reviews
- Monthly HSE Statistics
- Training/Awareness Participation Forms
- Emergency Drill reports

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 audits and inspections and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary.

EMERGENCY PREPAREDNESS AND RESPONSE PLAN**7.0 REPORTING****7.1 *Audit reports (by SPV)***

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 6 “Audit and Review” of this Plan; these evidences are described in the audit reports.

7.2 *EPC Contractor Monitoring Reporting*

EPC Contractor is responsible to collect the HSE statistics (including all types of training delivered to their staff according to Training Management Plan or annually prepared training program) on a monthly basis and report to SPV. If any Subcontractor is involved, it is responsible for duly implementing requirements included in EPC Contractor Procedure under the EPC Contractor supervision. EPC Contractor will record all emergency drills.

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.