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**PERFORMANCE RECORD KEEPING PROCEDURE****PURPOSE SCOPE**

This Performance Record Keeping Procedure has been developed in accordance with SPV policies, with the commitments undertaken by SPV in the ESA. Moreover, this procedure has also been developed in order to review the SPV's progress against its Key Performance Indicators mentioned in SPV Management Plans/Procedures.

**APPLICATION**

This Procedure 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 the 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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**PERFORMANCE RECORD KEEPING PROCEDURE****ACRONYMS**

<b>KİP</b>	Kocaeli Integrated Health Campus Project
<b>SPV</b>	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
<b>Golder</b>	Golder Associates Turkey Ltd. Şti.
<b>BAT</b>	Best Available Technology
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EDC</b>	Export Development Canada
<b>EHS</b>	Environmental, Health and Safety
<b>EPC</b>	Engineering Procurement and Construction
<b>ES</b>	Environmental and Social
<b>ESHS</b>	Environmental, Social Health and Safety
<b>ESA</b>	Environmental and Social Assessment
<b>ESMP(s)</b>	Environmental and Social Management Plan(s)
<b>ESMS</b>	Environmental and Social Management System
<b>ESAP</b>	Environmental and Social Action Plan
<b>EU</b>	European Union
<b>GHG</b>	Greenhouse Gas
<b>GIIP</b>	Good International Industry Practice
<b>HS (or OHS)</b>	(Occupational) Health and Safety
<b>IFC</b>	International Finance Corporation
<b>IFC, EBRD WA GN</b>	Workers' accommodation: processes and standards A guidance note by IFC & EBRD
<b>KPI</b>	Key Performance Indicators
<b>OPIC</b>	Overseas Private Investment Corporation
<b>PR</b>	Performance Requirement (issued by EBRD)
<b>PS</b>	Performance Standard (issued by IFC)
<b>SEP</b>	Stakeholder Engagement Plan
<b>WHO</b>	World Health Organization

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**PERFORMANCE RECORD KEEPING PROCEDURE****1.0 PURPOSE AND SCOPE OF THE PROCEDURE**

This Procedure 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, IFC Performance Standards, IFC General EHS Guidelines, Sector specific EHS Guidelines, OPIEC 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 the Procedure is to review the SPV's progress against its Key Performance Indicators mentioned in SPV Management Plans/Procedures.

This Procedure has to be read in conjunction with the ESMS documentation listed in Section 2.2.

KPIs mentioned in SPV Management Plans/Procedures which need to be reviewed in terms of achievement of the goals are shown in below table.

Document ID	ID Code of the KPI*	KPIs
KIP-ESMS-TRN-001	TRN-01, TRN-02, TRN-05, TRN-06, TRN-07, TRN-08, TRN-09	% of employees trained
	TRN-03	% of employees representative trained
	TRN-10	Training records
	TRN-11	Training records, certificates on statutory trainings
KIP-ESMS-HAZ-001	HAZ-10	Trained personnel %
	HAZ-22	Amounts [kg] Number and volume [L]
KIP-ESMS-WAM-001	WAM-03	Records correctly filled in and available for 5 years
	WAM-14	Storage days
	WAM-15	Waste disposal records
	WAM-17	Trained personnel %
	WAM-18, WAM-19	Amounts (kg)
	WAM-20	Soil quality
KIP-ESMS-WWM-001	WWM-12	Quantity (m3)
	WWM-13, WWM-14	Water quality
KIP-ESMS-AIR-001	AIR-01, AIR-02, AIR-03	Suspension of dust from excavation areas No. of complaints.
	AIR-04	Release of materials and particulate matter from truck transporting fugitive material No. of complaints
	AIR-05	Enclosure and/or cover of storage of fine material
	AIR-06, AIR-07	Re-vegetated dumping area (m2)
	AIR-08	Deposition of dust on the public roads at the exits of the construction site No. of complaints

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Document ID	ID Code of the KPI*	KPIs
	AIR-09, AIR-10	Fugitive material stockpile localization
	AIR-11	Suspension of dust from unpaved route No. of complaints
	AIR-12	Use of dust suppression techniques for cutting, grinding or sawing equipment
	AIR-13	Fugitive material source localization
	AIR-14	Outcome of the Control of Exhaust Gas Emissions
	AIR-15	Equipment and vehicles check
	AIR-16	Sulfur fuel concentration
	AIR-17	Vertical direction of construction plant/equipment/machinery exhausts
	AIR-18	Shutoff of vehicles and equipment engine when it is not in use for five minutes
	AIR-19	Use of electricity or battery powered equipment where practicable
	AIR-20	Presence of fires
	AIR-22	One day concentration of PM <sub>10</sub> [µg/m <sup>3</sup> ] Monthly average concentration of SO <sub>2</sub> and NO <sub>2</sub> [µg/m <sup>3</sup> ]
KIP-ESMS-NOM-001	NOM-01	Stop of construction activities during nighttime
	NOM-02	Announcement of related information on a board
	NOM-03	Night time traffic reduction
	NOM-04	Leq sound power level
	NOM-06, NOM-07, NOM-08	LpA,1m Sound Pressure Level @ 1m
	NOM-09	Vibration, isolation
	NOM-10	Limitation of noisy equipment and operation
	NOM-11	Reducing traffic in community areas and verify compatibility of noise emissions of motor vehicles
	NOM-12	Grievance mechanism
	NOM-13	LEP,8h Worker's daily noise exposure level
	NOM-14	Equipment and vehicles check
	NOM-15	Noise sources localization
	NOM-16	Acoustic barriers localization
	NOM-17	Permanent facilities localization
	NOM-18	Taking advantage of the natural topography
	NOM-19	Providing information and training to workers about equipment
	NOM-20	Conduction of hearing tests
	NOM-21	LAeq,10' A-Equivalent Sound Pressure Level

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Document ID	ID Code of the KPI*	KPIs
	NOM-22	LEP,8h Worker's daily noise exposure level
	NOM-23	A(8) Worker's daily vibration exposure level
	NOM-24	A(8) Worker's daily vibration exposure level
KIP-ESMS-TRA-001	TRA-08	Trained personnel
	TRA-09	Number of accidents
	TRA-10	Training records
	TRA-11	Grievance records on Project vehicles and drivers
	TRA-12	Emission reports
	TRA-13	Grievance records on Project records
KIP-ESMS-CCM-001	CCM-16	See grievance mechanism procedure
KIP-ESMS-EMP-001	EMP-14	Grievance recorded, grievances responded
	EMP-25	% of local workforce
	EMP-30	Number and % of local workforce
	EMP-31	Number and % of local business contracted
KIP-ESMS-EPR-001	EPR-08	Trained personnel %
KIP-ESMS-SPL-001	SPL-01	Trained personnel %
KIP-ESMS-GRM-001	GRM-05	Grievance recorded, grievances responded
	GRM-07, GRM-08	% of grievances responded, % of grievances responded and solved within timeframe, % of grievances solved with satisfaction, Trend of grievances of similar nature over time
KIP-ESMS-LAI-001	LAI-01	Training attendance (at least 90% of staff)
	LAI-05	All accidents/incidents
	LAI-06	All injuries and serious incidents
	LAI-07	All accidents and diseases
KIP-ESMS-LST-001	LST-01	All data to be provided in App.1

\*indicated in the tables in section 4 and 5 in SPV Management Plans/Procedures

**2.0 BACKGROUND POLICIES AND STANDARDS****2.1 International standards**

Source	Document Title
The Equator Principles Association	<a href="#">The Equator Principles, June 2013</a>
IFC - International Finance Corp.	<a href="#">IFC Performance Standards</a>
IFC - International Finance Corp.	<a href="#">IFC General EHS Guidelines</a>
EBRD	<a href="#">EBRD Performance Requirements</a>
OPIC	OPIC Environmental and Social Policy Statement



**PERFORMANCE RECORD KEEPING PROCEDURE****2.2 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)
KİP-ESMS-SEP-001	Kocaeli Stakeholder Engagement Plan
KİP-ESMS-TRN-001	Kocaeli Training Management Plan
KİP-ESMS-HAZ-001	Kocaeli Hazardous Material Management Plan
KİP-ESMS-WAM-001	Kocaeli Waste Management Plan
KİP-ESMS-WWM-001	Kocaeli Waste Water Management Plan
KİP-ESMS-AIR-001	Kocaeli Air Quality Management Plan
KİP-ESMS-NOM-001	Kocaeli Noise Management Plan
KİP-ESMS-TRA-001	Kocaeli Traffic Management Plan
KİP-ESMS-CCM-001	Kocaeli Construction Camp Management and Monitoring Plan
KİP-ESMS-EMP-001	Kocaeli Employment and Procurement Plan
KİP-ESMS-EPR-001	Kocaeli Emergency Preparedness and Response Plan
KİP-ESMS-SPL-001	Kocaeli Spill Response Plan
KİP-ESMS-GRM-001	Kocaeli Grievance Mechanism Procedure
KİP-ESMS-LAI-001	Kocaeli Labour's Accident and Incident Record Keeping Procedure
KİP-ESMS-LST-001	Kocaeli Labour's Safety and Training Record Keeping Procedure

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## PERFORMANCE RECORD KEEPING PROCEDURE

### 3.0 ROLES AND RESPONSIBILITIES

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

#### 3.1 EPC Contractor & Subcontractors

EPC Contractor has to issue its own procedure aimed at verifying the correct development, compliance and implementation of its own ESMS.

EPC Contractor have to ensure the effective implementation of this procedure by providing, in line with the EPC contract provisions, full availability of its resources, as well as full access to Construction Site and documentation for the Performance Record Keeping by SPV and for Audit carried out by other third parties allowed by SPV Management.

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 this procedure. SPV Management is responsible for:

- This Procedure's and EPC Contractor Procedure's final approval
- 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 Procedure is up to date and appropriate to the nature and scale of the KIP and ensuring that this Procedure is implemented effectively by EPC Contractor;
- proposing to SPV Management, if necessary, amendments and/or updates to this procedure and issuing revisions.

### 4.0 MANAGEMENT METHODS

This procedure is linked with SPV and EPC Contractor's activities which is based on the performance of KPIs mentioned in section 1 of this procedure.

Performance of KPIs have to address:

- The correct implementation of SPV policies, ESMPs, Management/Monitoring Plans and procedures;
- For the ESMPs in particular the correct implementation of the points indicated in the tables in section 4 and 5;

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SPV and EPC Contractor will assess the performance of KPIs by an auditing program. The audit of SPV's and EPC Contractor's activities and operations is a systematic process that is based on the performance audit of periodic documentation reviews, interviews, interviews with Site Management.

**4.1 Internal audit management**

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

The overall Auditing process is managed by the SPV HSE Manager, that has the responsibility of planning, defining and supervising the activities, while the HSE Manager and Environmental Engineer (each one related to their own competences) have the role of coordinating and implementing the audit process.

Audit activities are formalized in an Audit Program that has to be prepared yearly by the HSE Manager and Environmental Engineer by establishing schedule and scope of the Audits to be performed throughout the year. The Audit Program has to ensure that the following are audited every six months:

- Each relevant environmental, social and OHS aspect identified in the ESMPs;
- Each significant construction activity/operation;
- Each SPV department having specific responsibilities in Environmental, Social and OHS issues management (including, but not limited to, Top Management, HSE department, HR Department, Community Relation Department, Security Manager).

For each planned audit, the following information has to be provided:

- Areas, departments (including EPC Contractor and subcontractor departments);
- Environmental, social and OHS aspects (all standards, management plans, procedures, work instructions etc.).

**4.2 Planning of audits**

SPV HSE Manager has the responsibility of organizing and implementing the audits by determining the following aspects:

- Schedule and timing;
- Location of audit and kick off the meeting;
- Documents and reports to be reviewed;
- Areas of the Construction site (and other areas) to be surveyed and inspected;
- Presence of external grievances related to the aspect to be audited;
- Results of the previous audit.

**PERFORMANCE RECORD KEEPING PROCEDURE****4.3 Audit Reporting**

Once the Audit is concluded, the appointed auditor will prepare an Audit Report. The audit report has to contain at least the following information:

- Audit ID code (progressive number /year-quarter);
- Date of the Audit;
- Scope of the Audit (Areas/Departments and Environmental Social and OHS aspects subject to audit);
- Name/role of the auditees;
- List of plans, procedures, work instructions whose requirements have been reviewed;
- A compliance table with regards to all KPIs (mentioned in section 1 of this procedure) and national, international standards and GIIP;
- A performance table including the KPIs and target/acceptance criteria;
- Date of Report and SPV HSE Manager's and Environmental Engineer's signature.

The audit report has to be submitted to SPV HSE Manager to sign and review. Then, it will be forwarded to the Construction HSE Manager. The reports have to be filed and kept as an ESMS record by SPV and Construction HSE Manager.

The following table outlines the conformance and performance assessments mentioned in section 4 of the all Management Plans/Procedures in the ESMS. One example is filled in the template table and presented below.

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

- The identification code (ID);
- the reference (or source) documents (i.e. ESA, ESMS Plans, Procedures, National legislation, IFC Performance Standards, EBRD Performance Requirements, OPIC Environmental and Social Policy Statement);
- 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 activity.

**PERFORMANCE RECORD KEEPING PROCEDURE**

ID.	Source doc.	KPI	Frequency/Timing	Target/ Acceptance criteria	Compliance	Responsibilities
PRK*-01	National Legislation, IFC PSX, EBRD PRX, OPIC Item X, KIP- ESMS-XXX*- 001	% of trained personnel**	biannually	100% of all employees	C/NC***	SPV or EPC Contractor or Subcontractor

\*from document number

\*\*as an example.

\*\*\*C for compliance / NC for noncompliance

## PERFORMANCE RECORD KEEPING PROCEDURE

### 5.0 REPORTING

#### 5.1 *Audit reports (by SPV)*

Evidences of the implementation of the performance and compliance of the KPIs and related results are collected through inspection and auditing activities as detailed in section 4 of this procedure; these evidences are described in the audit reports.

#### 5.2 *EPC Contractor Monitoring Reporting*

Reporting activities for this procedure for EPC Contractor is detailed in section 4.3.

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.