
COMMUNITY HEALTH AND SAFETY 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 of overview for identifying and assessing the project construction phase adverse impacts on the potentially affected communities and developing protection, prevention and mitigation measures proportionate to the impacts and risks.

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. This Plan should be read and implemented in conjunction with the several other Management Plans prepared for the Project.

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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COMMUNITY HEALTH AND SAFETY 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 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 provide a high level of overview for identifying and assessing the project construction phase adverse impacts on the potentially affected communities and develop protection, prevention and mitigation measures proportionate to the impacts and risks in compliance with the Turkish legislation and/or IFC, EBRD and OPIC requirements.

1.1 *Overlaps with other Management Plans*

This Management Plan has overlaps and cross-linkages to a number of other Management Plans which have community health and safety implications, including:

- Emergency Preparedness and Response Plan, particularly in relation to responding to off-site accidents and incidents which would have impacts on community.
- Spill Response Plan, particularly in relation to responding to large amount of spill incidents which would have impacts on community.
- Traffic Management Plan, particularly in relation to management of impacts using the new access road and public roads; noise emission control and air pollution control to minimize the impacts on community.
- Stakeholder Engagement Plan, particularly in relation to cooperation with community members through the engagement process defining and implementation of the mitigation measures for the control of risks and impacts created by the project on the community health and safety.
- Waste Management Plan, particularly in relation to the waste streams and define management actions including prevention, minimization, recycling, collection, storage, treatment and disposal of wastes.
- Hazardous Material Management and Monitoring Plan, particularly in relation to the transport, storage, use and disposal of hazardous materials.
- Noise and Vibration Management Plan, particularly in relation to the reduction of the potential noise and vibration impacts on community arising from construction activities and traffic.
- Air Quality Management Plan, particularly in relation to the in relation to management of community exposure to dust generated by construction activities and traffic.

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- Wastewater Management Plan, particularly in relation to reduction of the amount of wastewater generation and to avoid, minimize, and control adverse impacts to human health, safety and to the environment, surface water and groundwater.
- Grievance Mechanism Procedure, particularly in relation to the monitoring and acting on any grievance received from communities regarding Health and Safety or any other concerns about the project i.e. labors.

2.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this procedure 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, EHS Guidelines, OPIC as well as from GIIP.

2.1 National standards and regulations

TITLE	Turkish Reg. Gaz. Date
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 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 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
Regulation on Decreasing the Ozone Depleting Materials	27052, 12/11/2008
Regulation on Water Pollution Control (Turkish SKKY)	25687, 31/12/2004
Regulation on Control of Pollution Caused by Dangerous Substances in Water and its Environment	26005, 26/11/2005
Regulation on Radiation Safety	23999, 24/03/2000
Regulation on the Safely Transportation of Radioactive Materials	25869, 08/07/2005
Regulation on the Transportation of Dangerous Goods by Road ("Accord Dangerous Routier" – ADR)	28801, 24/10/2013
Regulation on Classification, Package and Labeling of the Hazardous Materials and Aids (still in force until 01/06/2016, hereinafter mentioned as "CLP").	27092, 26/12/2008
Regulation on Classification, Labeling, and Packaging of Materials and Mixtures	28848, 11/12/2013
Regulation on Preparation and Distribution of Safety Data Sheets on Hazardous Materials and Aids (still in force until 01/06/2016, hereinafter mentioned as "SDS").	27092, 26/12/2008
Regulation on Inventory and Control of the Chemicals (hereinafter mentioned as "Chem").	27092, 26/12/2008

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TITLE	Turkish Reg. Gaz. Date
Regulation on the Restrictions relating to the Production, Supply to the Market and Use of certain Hazardous Materials, Products and Goods (including asbestos and PCB, hereinafter mentioned as "HazMat").	27092, 26/12/2008 27880, 20/03/2011
Regulation on Control of Soil Pollution and Sites Contaminated by Point Sources	27605, 08/06/2010

2.2 International standards

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, IFC Performance Standard and Guidelines and OPIC Environmental and Social Policy Statement.

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

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Principal roles and responsibilities for the implementation of this procedure 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 Procedure 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 Contractor's 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 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 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;
- 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.

COMMUNITY HEALTH AND SAFETY PLAN**4.0 MANAGEMENT METHODS AND MITIGATION MEASURES**

The community may be exposed to potential risks of health and safety associated with hazards created through the Project construction phase and equipment, vehicles and infrastructure allocated for project use. Major directly affected community members during the construction phase are members living nearby the Project area and visitors to the construction site.

Key risks identified in the ESA and addressed by this Plan include:

- Transportation related safety risks
- Waste management related health risks
- Infrastructure, building, and equipment design and safety
- Management of camp and construction and communicable diseases
- Noise and air emissions as health hazards during construction activities

As an overarching attempt to control and minimize the community health and safety impacts SPV will;

- Cooperate with the project stakeholders through the engagement process detailed in the Stakeholder Engagement Plan while defining and implementation of the mitigation measures for the control of risks and impacts created by the project on the community health and safety.
- Prepare an accident and incident investigation procedure. This procedure will include the investigation process for the potential accidental events, injuries or diseases that may occur during the lifecycle of the project as a result of project related facilities. This procedure will also define the process for documenting the findings of the investigation and adopting measures for the prevention of reoccurrence.
- Inform and consult community members on specific project activities such as crossings, fragmentation; the potential for off-site effects to human health or the environment following an accident at planned or existing hazardous installation; appropriate behavior and safety measures to be adopted in the event of an accident including practice drills in locations with higher risk and similar, they will be informed on the health and safety precautions and procedures through consultation meetings.
- Providing access to the community members of the information necessary to understand the nature of the possible effect of an accident and an opportunity to contribute effectively, as appropriate, to decisions concerning hazardous installations and the development of community Emergency Preparedness and Response Procedures.
- Make sure that, EPC Contractor and subcontractors will be informed on the requirements for ensuring community health and safety.
- Recruit or subcontract security personnel in order to ensure the security of the working areas. Conduct risk assessment prior to the appointment of security personnel, reference checks on

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security personnel candidates, training on the code of ethics, on conflict resolution, crowd management, restraint and cautious exercise of security activity and appropriate use of force and monitoring of security personnel performance.

- A Grievance Mechanism will be in place as detailed in Stakeholder Engagement for communities and individuals to formally communicate their concerns, complaints and grievances and facilitate resolutions that are mutually acceptable by the parties.

In order to avoid and minimize the adverse impacts of potential transportation related safety risks, waste management related health risks and infrastructure, building, and equipment design and safety related risks, control measures to be implemented within the Project are explained in relevant Management Plans given in Section 1.1 of this Plan.

Increased potential for communicable diseases is another potential risk which would be an issue especially during construction of the camp. In order to avoid communicable diseases following control measures will be implemented:

- Pre-employment health screening and regular medical checks of workers as per Turkish regulatory requirements.
- Support local public health campaigns.
- Awareness-raising on health lifestyles for workers and community level training.
- Grievance Mechanism to monitor concerns of community plans.

5.0 MONITORING

The following table details the monitoring (measurement) activities for the preservation of community health and safety 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, 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
CHS-01	IFC- EHS GL	Number of communicable and non-communicable diseases and injuries.	Ongoing	n.a.	No significant increase in communicable and non-communicable disease	EPC Contractor
CHS-02	IFC- EHS GL, IFC PS 4, EBRD PR4	Number of community health safety & security complaints from local communities as recorded in the grievance management system.	Ongoing	n.a.	Minimise and continued improvement in number of community health safety and security related complaints.	EPC Contractor
CHS-03	Law No. 6331 IFC- EHS GL, IFC PS 4, EBRD PR4	Number of reported community health, safety and security incidents. Incidents to be recorded on a monthly basis.	Monthly	n.a.	Minimise and target zero per annum.	EPC Contractor
CHS-04	IFC- EHS GL, IFC PS 4, EBRD PR4	Number of community members involved in safety awareness training.	Annual	n.a.	Project affected community members to attend trainings	EPC Contractor
CHS05	IFC- EHS GL, IFC PS 4, EBRD PR4	Air quality and noise monitoring	As per the KIP-ESMS-AIR-001, KIP-ESMS-NOM-001	As per the KIP-ESMS-AIR-001, KIP-ESMS-NOM-001	As per the KIP-ESMS-AIR-001, KIP-ESMS-NOM-001	As per the KIP-ESMS-AIR-001, KIP-ESMS-NOM-001

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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 relevant Monitoring Plans referenced in Section 1.1 of this Plan.

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

- Records of communicable and non-communicable diseases and injuries.
- Records of community health safety & security complaints from local communities as recorded in the grievance management system
- Records of community health, safety and security incidents.
- Training/Awareness Participation Forms for the community members involved in safety awareness training.
- Air and noise emission monitoring 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.

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7.0 REPORTING

7.1 *Audit reports (by SPV)*

Evidences of the implementation of the actions/measures and related results are collected through inspection and auditing activities as detailed in section 6 "Audit and Review" of this Procedure; 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 communities and incident records) 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.

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.