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DEFINITIONS

Kocaeli or SPV:	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Kocaeli Integrated Health Campus Project (or “KİP” or simply “Project”):	Kocaeli Integrated Health Campus Project, being executed by Kocaeli 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 IBP, aimed at mitigating potential ESHS risks and impacts and improving ESHS performance
Guidelines to EPC Contractor	Guidelines to EPC Contractor 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 Contractor, to be used by EPC Contractor to describe how the mitigation and monitoring measures/actions outlined in SPV ESMPs are actually implemented.

Child Labor and Forced Labor

Turkish Labor Law sets provisions related to child labor and forced labor. According to the Turkish Labor Law, it is forbidden to employ children under the age of fifteen. Children and young employees under the age of eighteen must not be employed on industrial work / construction works / construction site.

The minimum age for all construction workers is 18 years old. Workers who have not received relevant occupational training for the work they are responsible for must not be employed on heavy and dangerous work during the night. Forced labor is prohibited by the Turkish Labor Law.

EPC will comply with the provisions of Turkish Labor Law with regard to child labor and forced labor. EPC will also address child labor and forced labor in its supply chain consistent with the provisions of OPIC Environmental and Social Policy Statement, PS2 and EBRD PR2 under child labor and forced labor.

Non-Employee Workers and Supply Chains

In accordance with IFC PS2 and EBRD PR2, Gama-Türkerler will use commercially reasonable efforts to apply the requirements of PS2 and PR2 to non-employee workers directly contracted by Gama-Türkerler, except for provisions of PS2 and PR2 under HR policy, retrenchment and supply chain. The main objectives of Gama-Türkerler in terms of this Policy are:

- To promote the fair treatment, non-discrimination, and equal opportunity of workers.
- To establish, maintain, and improve the worker-management relationship.
- To promote compliance with national employment and labor laws.
- To care for workers, including vulnerable categories of workers such as children, migrant workers,
- To promote safe and healthy working conditions, and the health of workers.
- To avoid the use of forced labor.

EPC will address child labor and forced labor in its supply chain consistent with the provisions of OPIC Environmental and Social Policy Statement, PS2 and EBRDPR2 under child labor and forced labor.