



Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş. (Kocaeli or SPV)

Kocaeli Integrated Health Campus Project (KİP)

DOCUMENT NUMBER:

KİP-ESMS-HRP-001

DOCUMENT TITLE:

HUMAN RESOURCE POLICY AND MANAGEMENT PLAN – FINAL

REV	DATE	PAGES	DESCRIPTION	PRPD	CHKD	OWNER	CLIENT	
						APPROVED		

HUMAN RESOURCE POLICY AND MANAGEMENT PLAN

PURPOSE SCOPE

This Management Plan has been developed in accordance with SPV policies, the commitments undertaken by SPV in the ESA, Turkish regulatory framework, IFC Performance Standards, IFC General and Sector Specific EHS Guidelines, EBRD Performance Requirements, 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 the general approach for developing and implementing a thorough training and awareness program on the management of environmental, social, occupational health and safety issues to relevant parties involved in the Project during the Construction phase.

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

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 Contractor and Subcontractors 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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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
CRD	Community Relation Department
CRO	Community Relation Officer
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
HRD	Human Resources Department
HRM	Human Resources Manager
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
HR	Human Resources
ILO	International Labor Organization
GT	Gama - Türkerler
Project	Kocaeli Integrate Health Campus Project

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1. PURPOSE AND SCOPE OF THE PLAN

This Human Resources Management Plan (HRMP) will be implemented in order to describe how labor and working conditions will be managed for the construction phase of the Project. This plan will address the following issues:

- Legal and Policy Context
- General Condition of Service
- Non-Discrimination
- Grievance Mechanism
- Child Labor and Forced Labor
- Health and Safety
- Supply Chains

2. LEGISLATION AND LOCAL AND INTERNATIONAL STANDARDS

Legislations and standards that apply to the project comprise the following:

- IFC Performance Standard 2: Labor and Working Conditions
- EBRD Performance Requirement 2: Labor and Working Conditions
- International Labor Organization (ILO) Fundamental Conventions
- Turkish Labor, Health and Safety Legislation
- IFC General Environmental Health and Safety Guidelines

3. IFC PS2 AND EBRD PR2 REQUIREMENTS

IFC PS2 and EBRD PR2 set out policies and standards of international good practice related to labor and working conditions. The objectives of the PS2 and PR2 are:

- to establish, maintain and improve the worker-management relationship,
- to promote the fair treatment, non-discrimination and equal opportunity of workers, and compliance with national labor and employment laws,
- to protect the workforce by addressing child labor and forced labor,
- to promote safe and healthy working conditions, and to protect and promote the health of workers.

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The PS sets out several requirements for IFC clients, summarized in Table below.

PS2/PR2 Provisions	Summary of the Requirements
<i>Working Conditions and Management of Working Relationship</i>	
Human Resources (HR)Policy	Client to adopt a HR policy that is consistent with PS2/PR2. Under the policy, the client will inform employees of their rights. It will be clear and will be made available at start of employment.

PS2/PR2 Provisions	Summary of the Requirements
Working Relationship	Working conditions and terms of employment will be clearly documented and communicated to employees and contracted workers.
Working Conditions and Terms of Employment	If the client is a party to a collective bargaining agreement, the terms of the agreement will be respected. Where not, working conditions and terms of employment will at least comply with national law. In addition, the client will comply with the ILO conventions on the abolition of child labor, elimination of forced labor, elimination of discrimination and freedom of association and collective bargaining.
Worker's Organizations	Where national law recognizes worker's rights to associate and bargain collectively, the client will comply with the national law and engage with worker's organizations and provide them with information needed for meaningful negotiation in a timely manner. Where the law is restrictive, the client will enable alternative means of expression, including a mechanism for grievances.
Non-Discrimination and Equal Opportunity	The employment relationship will be based on the principle of equal opportunity and fair treatment, and will not discriminate with respect to hiring, compensation, working conditions and terms of employment, access to training, promotion, termination of employment or retirement and discipline. The client will also comply with EU requirements on non-discrimination related to employment.
Retrenchment	The client will develop a plan to mitigate the adverse impacts of retrenchment in line with national law and good industry practice and based on the principles of non-discrimination and consultation.

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Grievance Mechanism	The client will provide a grievance mechanism for workers, inform the workers about the mechanism at the time of hire and make it easily accessible to them. The mechanism should be transparent and well understood, and should address concerns promptly at an appropriate level of management. The mechanism should not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures, or substitute for
<i>Protecting the Workforce</i>	
Child Labor	The client will not employ children in a manner that is exploitative, is likely to be hazardous, or to interfere with child's education, or to be harmful to child's health or development. The client will follow national laws as applicable, but children below the age of 18 will not be employed in dangerous work.
Forced Labor	The client will not employ forced labor, which 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

PS2/PR2 Provisions	Summary of the Requirements
	involuntary or compulsory labor, such as indentured labor, bonded Labor or similar labor-contracting arrangements.
<i>Occupational Health and Safety (OHS)</i>	
Health and Safety	The client will provide the workers with a safe and healthy work environment, taking into account inherent risks and hazards. Steps will be taken to prevent accidents, injury and disease arising from, associated with or occurring in the course of work by minimizing the causes of hazards as far as practicable. In line with good international industry practice, the client will address identification of hazards; provision of preventative and protective measures; training of workers; documentation and reporting of accidents, diseases and incidents; and emergency prevention, preparedness and response arrangements. The client will also comply with the relevant EU OHS requirements and when such requirements do not exist, relevant IFC OHS guidelines. Moreover, the client will maintain an OHS management system in line with good international practice.
<i>Non-Employee Workers and Supply Chain</i>	

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Non-Employee Workers	The client will use commercially reasonable efforts to apply the requirements of PS2/PR2 to non-employee workers directly contracted, except for provisions under HR Policy, Retrenchment and Supply Chain.
Supply Chain	The client will address child labor and forced labor in its supply chain consistent with the provision under Child Labor and Forced Labor.

4. ILO FUNDAMENTAL CONVENTIONS

IFC PS2 and EBRD PR2 are in part guided by a number of ILO Conventions, and PS2 as well as PR2 require complying with four core labor standards of ILO including child labor, forced labor, non-discrimination and freedom of association and collective bargaining. Furthermore, ILO has identified eight conventions as "fundamental (or core)", covering subjects that are considered as fundamental principles and rights at work. These fundamental conventions are presented in table, all of which are ratified by Turkey. RMI will comply with the requirements of these conventions during the construction and operation phases of the Project.

Convention Name	Key Provisions
C29: Forced Labor (Ratification by Turkey: 1998)	<ul style="list-style-type: none"> Forced or compulsory labor not permitted Existing practices to be suppressed in the shortest possible time Regulated by governments that are signatories to the convention
C 87: Freedom of Association and Protection of the Right to	<ul style="list-style-type: none"> Workers and employers have the right to establish and join organizations of their choice, subject to the rules of the organization concerned

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Convention Name	Key Provisions
Organize (Ratification by Turkey: 1993)	<ul style="list-style-type: none"> Regulated by governments that are signatories to the convention
C98: Right to Organize and Collective Bargaining (Ratification by Turkey: 1952)	<ul style="list-style-type: none"> Workers to be protected against anti-union discrimination in the workplace Worker's and employer's organizations to be protected from acts of interference Regulated by governments that are signatories to the convention
C 100: Equal Remuneration (Ratification by Turkey: 1967)	<ul style="list-style-type: none"> Men and women to receive equal remuneration for work of equal value, consistent with the provisions of the applicable remuneration methods Regulated by governments that are signatories to the convention
C 105: Abolition of Forced Labor (Ratification by Turkey: 1961)	<ul style="list-style-type: none"> Forced labor not to be used for political ends, for economic gain, as a form of discipline or punishment, or in the context of discrimination Regulated by governments that are signatories to the convention
C111: Discrimination (Ratification by Turkey: 1967)	<ul style="list-style-type: none"> Equal opportunity in respect of employment and opportunity to be pursued in a manner appropriate to national practice Discrimination based on race, color, sex, religion, political opinion, nationality not permitted Exclusion or preference in respect of the requirements of a specific job is not discrimination Regulated by governments that are signatories to the convention

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C138: Minimum Age (Ratification by Turkey: 1998)	<ul style="list-style-type: none"> • Child labor to be progressively abolished where it is still practiced • Signatories to determine a locally appropriate minimum age, not less than 15 years or 14 in specific circumstances • Regulated by governments that are signatories to the convention
C182: Worst Forms of Child Labor (Ratification by Turkey: 2001)	<ul style="list-style-type: none"> • Elimination of child exploitation through slavery, prostitution, pornography, illicit services or work which is harmful to health, morals or safety • Regulated by governments that are signatories to the convention

5. NATIONAL LEGISLATIONS

IFC PS2 and EBRD PR2 require complying with the national laws and regulations that are applicable to projects with regard to labor and working conditions and health and safety.

- Labor Law (Official Gazette-OG- Date/Number: 10.6.2003/25134)
- Occupational Health and Safety Law (OG Date/Number: 30.06.2012/28339)
- Regulation on the Minimum Wage (OG Date/Number: 01.08. 2004/25540)
- First Aid Regulation (OG Date/Number: 22.05.2002/24762)
- Regulation on Working Duration Related to Labor Law (OG Date/Number: 06.04.2004/25425)
- Regulation on Excess Work and Work in Excess Periods (OG Date/Number: 06.04.2004/25425)
- Regulation on Special Principles in Works Carried out by Employing Workers in Shifts (OG Date/Number: 07.04.2004/ 25426)
- Occupational Health and Safety Risk Assessment Regulation (OG Date/Number: 29.12.2012/28512)
- Regulation on the Provisions of Occupational Health and Safety Training of Employees (OG Date/Number: 15.05.2013/28648)
- Occupational Health and Safety Services Regulation (OG Date/Number: 29.12.2012/28512)
- Communiqué on Danger Class Lists Related to Occupational Health and Safety (OG Date/Number: 26.12.2012/28509)
- Regulation on Duties, Authority, Responsibilities and Trainings of Occupational Health and Safety Specialists (OG Date/Number: 29.12.2012/28512)

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- Regulation on the Occupational Health and Safety Boards (OG Date/Number: 18.01.2013/28532)
- Regulation on the Health and Safety Measures to be taken in Workplace Buildings and
- Additions (OG Date/Number: 17.07.2013/28710)
- Regulation on Health and Safety at Construction Works (OG Date/Number: 05.10.2013/28786)
- Regulation on the Tasks, Authority, Responsibility and Education of On-Site Doctor and Other
- Health Personnel (OG Date/Number: 20.07.2013/28713)
- Regulation on Health and Safety Requirements in the Use of Work Equipment (OG Date/Number:25.04.2013/28628)
- Regulation on Manual Handling (OG Date/Number: 24.07.2013/28717)
- Regulation on Fire Protection of Buildings (OG Date/Number: 19.12.2007/26735)
- Regulation on the Emergency Cases in Workplaces (OG Date/Number: 18.06.2013/28681)
- Regulation on the Use of Personal Protective Equipment in Workplaces (OG Date/Number:
02.07.2013/28695)
- Regulation on Safety and Health Signs (OG Date/Number: 11.09.2013/28762)
- Regulation on the Protection of the Workers against Risks Relevant to Noise (OG Date/Number: 28.07.2013/28721)
- Regulation on the Protection of the Workers against Vibration Risks (OG Date/Number:
22.08.2013/28743)
- Regulation on Occupational Health and Safety in Temporary or Fixed Term Employment (OG Date/Number: 23.08.2013/28744)
- Regulation on Suspension of Work in Workplaces (OG Date/Number: 30.03.2013/28603)
- Regulation on Health and Safety Measures in Works with Carcinogenic and Mutagenic Substances (OG Date/Number: 06.08.2013/28730)
- Regulation on Health and Safety Measures in Works with Chemical Substances (OG Date/Number: 12.08.2013/28733)
- Regulation on Protection of Workers from Dangers of Explosive Environments (OG Date/Number: 30.04.2013/28633)
- Regulation on the Prevention of Exposure Risks from Biological Agents (OG Date/Number: 15.06.2013/28678)

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- Regulation on the Works in Which Workers shall Work Maximum Seven and Half Hours or Less in a Day in Terms of Health Rules (OG Date/Number: 16.07.2013/28709)
- Regulation on Radiation Safety (OG Date/Number: 24.03.2000/23999)
- Regulation on the Working Principles and Radiation Dosage Limits of the Personnel Working with Ionizing Radiation Resources in Health Services (OG Date/Number: 05.07.2012/28344)
- Regulation on Safe Transportation of Radioactive Substances (OG Date/Number: 08.07.2005/25869)

6. HUMAN RESOURCES POLICY OF GAMA-TÜRKERLER***Our Human Resources Policy***

Our company culture, which is based on mutual trust and ethical values, is the key to our human resources policy. Each GAMA Company, active in different areas, determines their own flexible Human Resources practices that support their strategies and objectives to grow.

Our fundamental human resources strategy is to create a business environment to build up the motivation and the commitment of the employees, to invest in their professional growth, to preserve this environment by developing the necessary policies and technical knowledge, to attract the well-qualified professionals and to conserve our highly qualified employees.

Application and Recruitment Process

The recruitment process begins when we receive your CV. First, your educational background and work experiences are evaluated and matched with requirements of vacant positions.

If the information and qualifications provided in your CV are in line with the requirements of the vacant positions, you may be contacted and invited for an interview.

The CVs that are not matched at this time, are kept in our database for vacant positions available in the future. The candidates are going to be contacted when their qualifications match the requirements.

After being contacted, our Human Resources specialists conduct structured interviews with our candidates. The results of the interviews are informed to the candidates via e-mail.

At Gama-Türkerler we promote:

- Reliability and integrity
- Dynamism
- Team spirit and solidarity

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- Holistic perspective
- Customer orientation
- Creativity and innovation

7. MANAGEMENT OF HUMAN RESOURCES PROCEDURES

The following procedures will be used during the Project Execution stage .

Document ID	Document Title
KİP-ESMS-ESMS-001	Kocaeli ESMS Manual
KİP-ESMS-POL-001	Kocaeli Environmental, Health, Safety, Social and Human Resources Policy
KİP-ESMS-TRN-001	Kocaeli Training Management Plan
KİP-ESMS-SEP-001	Kocaeli Stakeholder Engagement Plan
KİP-ESMS-HAZ-001	Kocaeli Hazardous Material Management (Monitoring) 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 and Vibration Management Plan
KİP-ESMS-TRA-001	Kocaeli Traffic Management Plan (including measures for residents)
KİP-ESMS-ARC-001	Kocaeli Archaeological Chance Find Procedure
KİP-ESMS-CCM-001	Kocaeli Construction Camp Management and Monitoring Plan (including workers accommodation)
KİP-ESMS-EMP-001	Kocaeli Employment and Procurement Management 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-LST-001	Kocaeli Labour's Safety and Training Record Keeping Procedure
KİP-ESMS-LAI-001	Kocaeli Labour's Accident and Incident Record Keeping Procedure
KİP-ESMS-EIR-001	Kocaeli Employee Information Record Keeping Procedure
KİP-ESMS-PRK-001	Kocaeli Performance Record Keeping Procedure
KİP-ESMS-CHS-001	Kocaeli Community Health and Safety Plan
KİP-ESMS-CFL-001	Policy of Prohibition of Child Labour and Forced Labour
KİP-ESMS-TUP-001	Right to Join Trade Unions Policy
KİP-ESMS-SRA-001	Security Plan and Security Risk Assessment Plan
KİP-ESMS-COMP-001	Contractors Management Plan

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Also, the Human Resource Management System of Gama Holding applies to the employees of both Gama Holding and its affiliates where above procedures fall short.

- Gama- ISP-017 Human Resources Procedure,
- Gama- ISP-017-Y01 Instruction for Personnel Recruitment and Leave,
- Gama- ISP-017-Y02 Training Instruction,

Utmost care is paid to appoint proper personnel to ensure that the activities are implemented by competent personnel with required qualifications.

Furthermore, the training requirements are determined by the department managers, and internal or external training programs are applied

Dedicated project team responsible for the execution of the project will be assigned by Top Management as per Instruction for Personnel Recruitment and Leave as per document ISP-017-Y01.

Managing Director, Operations Deputy Managing Director and the Project Manager in accordance with the Recruitment Authorization Table (doc. no: ISP-017-Ek1) are responsible for selection of the personnel to be appointed regarding the project.

Project Managers in accordance with the Recruitment Authorization Table (doc. no: ISP-017-Ek1) are entitled to recruit the employees other than the key personnel that they may require during the execution locally in collaboration with Financial and Administrative Affairs / Human Resource Managers on Site.

The training programs are evaluated; experiences and technical capabilities of staff are recorded in a manner available to the department managers.

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8. ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are outlined below. Site Organization Plan is given in Annex.

Role	Responsibilities
GT Project Manager	<ul style="list-style-type: none"> • Overall responsibility for the development, review, approval and coordination of the numerous activities required to initiate, conduct and complete construction. • Ensure that this plan is prepared, and updated as required, based on the activities and operations GT undertakes as part of the project.

Role	Responsibilities
	<ul style="list-style-type: none"> • Ensure that adequate resources are made available to implement the procedures and guidelines outlined in this plan.
GT/Gama-Türkerler Human Resources Department	<ul style="list-style-type: none"> • Monitor workplace policies, procedures, and management plans, notably recruitment, severance arrangements, skills development, training and awareness and retrenchment. <p>Implement and monitor a transparent and non-discriminatory grievance procedure to manage workplace concerns</p>

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GT Human Resources Manager	<ul style="list-style-type: none"> • Implement workplace policies, procedures, and management plans, notably recruitment, severance arrangements, skills development, training and awareness and retrenchment. • Ensure that policies and procedures incorporate the provisions of national labor law and international standards such as those of the International Labor Organization, IFC PS2/ EBRD PR2 on Labor and Working Conditions, and the World Bank Group Environmental, Health and Safety Guidelines. • Implementation of the policies will cover direct, contracted and supply chain workers, and will include provisions covering human rights, non-discrimination, fair remuneration, equal opportunity, vulnerable people, skills development, grievance management, health and safety, forced and child labor, and the right to collective bargaining. Implement a transparent and non-discriminatory grievance procedure to manage workplace concerns
Contractors - Sub-contractors and employees	<ul style="list-style-type: none"> • Understand and comply with human resource procedures and guidelines outlined in this plan. • All ESMS documents produced and listed in Appendix 1 of ESMS Manual will be implemented and adopted for contractors and subcontractors. • Contractors and sub-contractors will follow the existing SPV policies and procedures during the life of the project.

9. HUMAN RESOURCES MANAGEMENT

Information given below is derived from Human Resources documents published by Gama-Türkerler Holding, which are mainly;

- General Codes of Employment
- Leave Procedure
- Permit Regulation
- Orientation Procedure
- Performance Management Procedure
- Personnel Selection and Placement Procedure
- Orientation Procedure
- Career Management Procedure

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- Training Procedure

10. GENERAL CONDITIONS RECRUITMENT

Recruiting for the proposed project will be coordinated and performed within the human resources/ Personnel department of GT.

GT will meet employee needs primarily from the available staff. In the event that employee need cannot be met by transferring available staff from other departments or from the database, candidate searches are conducted in the career sites. By posting notices on the job positions in the career site, the protection of the actuality of human resources database is provided and developments in the labor market is closely monitored. In addition to career sites, consultancy companies giving human resources services may be utilized for recruitment.

Knowledge and experience required by the job will be taken into account in the selection of new employees. In the process of election among the candidates having adequate knowledge and experience level, evaluation is made on the basis of issues related to personality traits.

Pre-evaluation and elimination process is conducted by Human Resources Department on the basis of written information to be obtained from database or career sites. At the end of the process, information regarding candidates to be considered having said properties is shared with the department officer who requested the personnel and suitable candidates are called for pre-interview. Interviews with candidates called for pre-interview are conducted with the participation of department officer who requested the personnel and Human Resources Department. In this interview the validity of the information given by the candidate during the application process is determined along with other considerations. At the same time, general physical appearance, health, financial, familial and psychological status of the candidate are evaluated.

Subsequent to completion of interview, results are presented to department officer who requested the personnel by Human Resources Department officer. Suitable candidates are sorted with the department officer and employment conditions (position, salary etc.) that will be proposed are determined. Human Resources Department gives information to the candidates about specified conditions and company principals according to the sorting and makes a job offer.

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11. EMPLOYMENT CONTRACT

IFC PS2 and EBRD PR 2 require documenting and communicating to all employees their working conditions and terms of employment, including their entitlement to wages and any benefits. According to Turkish Labor Law, the employer is required to have a written contract with the employees for employment with duration of one year or more. In cases when a written contract is not made, the employer is under obligation to provide the employee with a written document, within two months at the latest, showing the general and special conditions of work, the daily or weekly working time, the basic wage and any wage supplements, the time intervals for remuneration, the duration (if it is a fixed term contract) and conditions concerning the termination of the contract.

GT will have a written contract with all employees complying with the requirements of the Turkish Labor Law and therefore will fulfill the requirements of PS2 and PR2 with regard to employment contracts.

12. WORKING HOURS

Regarding working hours and conditions, GT will comply with the Turkish laws and regulations. According to Regulation on Working Duration Related to Labor Law, the maximum working duration is 45 hours a week, and the daily working duration cannot exceed 11 hours in any case. According to Regulation on Excess Work and Work in Excess Periods, excess work is defined as “those works that exceed 45 hours a week”, and work in excess periods is defined as “those works that are lower than 45 hours a week according to a contract and when the work exceeds this working period set in the contract and becomes 45 hours a week”. Pursuant to article 4 of the subject regulation, the wage for each hour of the excess work is paid by increasing the hourly wage of normal working condition by 50%, and the wage for each hour of the work in excess periods is paid by increasing the hourly wage of normal working condition by 25%.

GT will ensure to communicate to all employees and workers the working durations including the conditions and wages related to excess works, as appropriate.

13. LEAVE

The termination of employment contract occurs in the events listed below:

- Resignation
- Justified severance
- Justified termination
- Mutual agreement

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- Death
- Age limit
- Transport

All employment leave (for any reason) is determined by the employment arrangements (collective agreements, contracts, employment agreements, employment policies, etc.) that govern the working relationship. Where leave is not clearly defined, the default leave allowance will be the Labor Code or the employment standards legislation within the geographical location where the employee performs his/her duties.

14. TRAINING

GT recognizes that training and development of its people is a key aspect of its long term future. Every year in September, training request analysis is performed by sending a notice to all employees through the portal and the said process is terminated in December. Human Resources Department creates training list according to training requests questionnaire to be filled through the portal. Training needs to be given priority are determined before submitting to group directors. After determination of training requests, training catalogue is created according to strategic targets of the company and shared with employees through the portal. As a result of the performance evaluation outcomes, satisfaction interviews, training requests and guidance of managers, group of participants list is determined.

15. NON-DISCRIMINATION

GT will strictly prohibit discrimination against any employee or applicant for employment because of the individual's race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, veteran's status or any other characteristic protected by law.

Turkish Labor Law forbids discrimination due to race, language, gender, political views and opinion and religion. In accordance with the equal treatment principle covered in article 5 of the Turkish Labor Law, employers should treat part time workers with the same rights as full time workers and indefinite period workers to definite period workers unless there are genuine reasons for not doing so. As GT will comply with the Turkish Labor Law and will base the employment relationships on the principle of equal opportunity and fair treatment, the Turkish standards will fulfill the requirements of PS2 and PR2 with regard to avoiding non-discrimination.

16. GRIEVANCE MECHANISM

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IFC PS2 and EBRD PR2 require providing a grievance mechanism for workers and their organizations, where they exist to raise reasonable workplace concerns. GT has developed an ESMS for the construction phase where grievances of employees related to environment, health and safety issues are handled and the workers are informed about the grievance mechanism at the time of employment.

GT will follow the grievance mechanism as outlined below:

- Grievances may be submitted by any method, including, grievance forms, letter, telephone, email, or through direct conversation with project personnel and Human Resources Department at Head Office,
- Grievance forms may be submitted through grievance boxes installed various points inside the camp site (dining hall, etc.),
- Grievances that are not submitted with the grievance form (Annex I) will be recorded in a grievance form by the Human Resources Manager residing at the camp who will be responsible for the recording and distribution of the grievances to the Head Office of Gama-Türkerler,
- The grievances delivered to Head Office of Gama-Türkerler will be distributed within the organization according to the subject of the grievance. Some part of the grievances will be evaluated by the Board members. After identification of what actions need to be taken, an appropriate response will be developed. The complaint action form will be filled in as presented in Annex II.
- A Grievance Register (Annex III) will be used for recording and documenting all complaints. The register will record the details of the complainant, the date of submission, the grievance issue, date of all correspondence or communications between GT/Gama-Türkerler and the complainant on the issue. The register will track all grievances through to their resolution,
- Grievance boxes will be controlled every two weeks and the complaints will be recorded and sent to the Head Office within one week by the HR Manager and discussed with the relevant staff and management to identify what action needs to be taken and develop an appropriate response,
- After development of the appropriate response, the complainant will then be informed (if the complainant is not anonymous) about the proposed corrective action to be taken and the date of response will be recorded in the grievance register,
- The complainant will be contacted through telephone or face-to-face meeting after the corrective action is taken to confirm that the action taken is satisfactory, and the response of the complainant will be logged in the grievance register,
- The grievance will be closed out if the complainant is satisfied with the action taken. If not, further assessment will be carried out and the grievance will need to be evaluated again,

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- GT will attempt to resolve all complaints within one month after receipt. If this is not possible, the complainant will be informed about the progress on a regular basis.
- Subcontractors will have their own grievance mechanism but nevertheless any grievances related to subcontractors' activities may be managed in line with the mechanism described here.

17. WORKERS ETHICAL CODE OF CONDUCT (CODE OF BUSINESS CONDUCT)

All employees of GT are in the context of Code of Ethics Agreement" published by Gama-Türkerler Holding. Employees are expected to comply with the ethical rules. Gama-Türkerler Ethics Hotline is a method for reporting matters that are; potentially unethical, illegal or are in violation of the Gama-Türkerler Global Code of Conduct. Per the internally published "Gama-Türkerler Code of Ethics and Business Conduct" document, each GT employee is responsible with following these rules and also advising their business colleagues to do so.

Gama-Türkerler Code of Ethics Hotline has been established as part of this responsibility and all third parties as well as GT employees may call this line to learn more about the company's business practices and also to report any business activities they perceive as having any wrongdoing or business misconduct.

All notices regarding Code of Ethics and Business Conduct shall be assessed by the Corporate Risk Department and all inquiries shall be responded by authorized individuals. Corporate Risk Department is responsible with assessment of all notifications and complaints in regards to violation of Gama-Türkerler Global Code of Conduct and cure any disobedience or noncompliance.

In case of observing or suspecting such unethical behaviors, illegal applications or business misconducts, employee may contact Gama-Türkerler Corporate Risk Department directly via published address, telephone or e-mail. All complaints and notifications shall be kept private and inquiry process shall be run with utmost confidentiality.

18. CHILD LABOR AND FORCED LABOR / NON-EMPLOYEE WORKERS & SUPPLY CHAIN

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.

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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 OPIEC 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 OPIEC Environmental and Social Policy Statement, PS2 and EBRDPR2 under child labor and forced labor.

19. SPECIFIC CONDITIONS FOR SERVICE***A. Accommodation Our Human Resources Policy***

GT will manage workers' accommodation and provide basic services to workers in line with the provisions of IFC PS2 and EBRD PR2 and also follow the guidance note on worker's accommodation published by IFC and EBRD (Worker's Accommodation: Processes and Standards). During the construction phase, GT will provide appropriate facilities to those employees who will need onsite accommodation. Workers' accommodation arrangements will not restrict workers' freedom of movement or of association.

Accommodations will meet national legislation and international good practice. According to the Guidance Note by IFC and the EBRD, giving special attention to the following issues with regard to housing is expected:

- Minimum space allocated per person (floor area; cubic volume; or size and number of rooms),

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- Supply of safe water in the workers' dwelling in such quantities as to provide for all personal and household uses,
- Adequate sewage and garbage disposal systems,
- Appropriate protection against heat, cold, damp, noise, fire and disease-carrying animals, and in particular, insects,
- Adequate sanitary and washing facilities, ventilation, cooking and storage facilities and natural and artificial lighting,
- A minimum degree of privacy both between individual persons within the household and for the members of the household against undue disturbance by external factors,
- Necessary provisions for any health, fire safety or other hazards or disturbances and local facilities as well as the provision of first aid and medical facilities,
- Workers freedom of movement to and from the employer-provided accommodation shall not be unduly restricted.

B. Health and Safety Accommodation Our Human Resources Policy

Occupational health and safety considerations during the construction of the IHC are common to those of most civil construction facilities. The health and safety hazards during the IHC operation may affect healthcare providers, cleaning and maintenance personnel and workers involved in waste management handling, treatment and disposal. Healthcare facility specific hazards have been highlighted to include: exposure to infections and diseases, exposure to hazardous materials/ waste, exposure to radiation and fire safety.

IFC PS2 and EBRD PR2 requires providing the workers with a safe and healthy work environment, taking into account inherent risks and hazards specific to the work. GT will develop an ESMS covering OHSAS

18001:2007 requirements for the management of health and safety issues. The management system will ensure that all applicable health and safety legislation is met during the construction phase.

20. VERIFICATION AND MONITORING

GT will implement and monitor Human Resources Management Plan in accordance with national regulations, IFC PS2 and EBRD PR2, EHS Guidelines and ILO.

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In addition, with regular visits to the construction site by HR Officers from the Head Office of Gama-Türkerler and employee satisfaction surveys conducted annually, needs of the employees as well as their satisfaction status will be monitored.

21. TRADE UNIONS

The Turkish Constitution is a guarantor of trade union rights. It affirms the right for employees 'to form labor unions... without obtaining prior permission' and 'to become a member of a union' (Article 51).

Article 34 of the Constitution asserts the right to hold 'unarmed and peaceful meetings and demonstration marches without prior permission'. Articles 53 and 54 affirm the right of workers to 'conclude collective bargaining agreements and 'to strike if a dispute arises during the collective bargaining process.

Gama- Türkerler recognizes the Constitutional Rights of the workers which allow any Gama-Türkerler worker to form Labour unions or become a member of a Trade Union without obtaining prior permission.

Gama – Türkerler confirms that, all Project workers regardless of contract length, will be committed to allow to join Trade Unions.

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ANNEX- I WORKER COMPLAINT FORM

KOCAELİ and İZMİR INTEGRATED HEALTH CAMPUS PROJECT- WORKER COMPLAINT FORM		
INFORMATION ABOUT THE PERSON SUBMITTING COMMENT AND/OR COMPLAINT (Please leave blank if you wish to remain anonymous. Your comments/complaints will still be considered by Gama-Türkerler .)		
Full Name:		
Date:		
Contact Information: (Please provide necessary information based on how you wish to be contacted)		
<input type="checkbox"/> By mail :		
<input type="checkbox"/> By telephone :		
<input type="checkbox"/> By e-mail:		
Indicate your purpose: <input type="checkbox"/> Comment <input type="checkbox"/> Complaint		Signature confirming receipt of completed Complaint Form copy
Recorded By : <input type="checkbox"/> Person submitting complaint <input type="checkbox"/> Other (please specify who)		
PLEASE DESCRIBE YOUR COMPLAINT BRIEFLY		
Date of Incident Regarding Complaint:		
<input type="checkbox"/> One time incident/grievance (Date))		
<input type="checkbox"/> Happened more than once (how many times?))		
<input type="checkbox"/> On-going (currently experiencing problem)		
What would you propose to resolve the problem? (Continue on the back of the sheet if required)		
This section will be filled by RMI Gama-Türkerler .		
STATUS OF COMPLAINT		
Complaint Logged (Y/N)	Date of submission:	Logged by:
Date of Response sent:	Complaint closed (Y/N):	Close out date and signature:

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ANNEX II – COMPLAINT ACTION FORM

Information about the complainant		
The reference number of the complaint (taken from the grievance log)		
Date of grievance submission		
Describe all the details relevant to the complaint		
Describe apparent cause of incident		
Immediate action required		
Identify preventive action (if required)		
<i>Continue on separate sheets as required.</i>		
Decision of the measures to be taken by HSE responsible	Name	Signature and date
Person responsible for corrective action	Name	Signature and date
Completion by	Name	Signature and date
Verification by	Name	Signature and date

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ANNEX III - GRIEVANCE REGISTER

Date of complaint submission	Complainant name	Complainant contact details	Issue of complaint	Date of informing the complainant on proposed action to be taken	Date of contacting the complainant after action is taken	Response of complainant

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