



Annual Environmental & Social Report

Please read the points below carefully before completing this annual report template:

- a) This reporting template is prepared to enable the Bank's Client to provide the Bank with an annual report, in form and scope satisfactory to the EBRD, on environmental and social matters arising in relation to the Project or which may affect the project. There are a number of questions where further information is requested. Additional information can either be provided in summary form in the boxes provided or, if more convenient, additional information can be annexed to the template for Bank review.
- b) As part of their annual environmental and social report, the Client is required to provide a summary of environmental and social performance, including an update on Environmental and Social Action Plan (ESAP) implementation status and other basic information to help the EBRD review the Client's compliance with the applicable environmental and social laws and the EBRD Performance Requirements (PRs).
- c) Depending on the Client's business, some sections of this template may seem less relevant than others. The Bank recognises that this will be the case but encourages Clients to provide clear and sufficient information in all sections of the template. The more comprehensive the answers given, the less need there may be for the Bank to request further information. Please, therefore, try to answer the questions as fully and openly, as possible.
- d) The information provided in this template will constitute a representation regarding the Client under the financing documentation.

1. Company Details**Client Name:** **Gaziantep Hastane Saglık Hizmetleri İşletme Yatırım Anonim Sirketi A.S.****Client Address:** **Süleyman Seba Caddesi No. 82 D.3 34357 Besiktas, Istanbul****Country:** **Turkey****Client authorized representative:****Name:** **Andrea Moresi****Title:** **Gaziantep PPP SPV, Chief Operation Officer**

I certify that, to the best of my knowledge and belief, the information contained in this report is true, complete and correct in all material respects and does not omit any material fact necessary.

Signature:
[Name, title]

Date: **14.01.2019****Contact Details:****Telephone:** **+90 212 2846080 / 1** **Mobile:****E-mail:** **a.moresi@salini-impregilo.com****Reporting Period:** **01 Jan to 31 Dec 2018**

Unless otherwise stated, the information provided below shall be for this reporting period only.

PART A. CORE QUESTIONS

2. Project Update	
Project Name (As given in the Project Legal Documentation):	Gaziantep Hospital PPP
Project OP ID (As given in the Project Legal Documentation):	45199
Please provide a summary update on the project implementation. If the project includes production or manufacturing please also include:	The Project's Construction Permit was secured on 13.04.2017 which was accepted as the official commencement of the 36-month construction period. The Financial Close date is 19.05.2017. The Project is within the construction period of 36-months.
3. Environmental and Social Action Plan (ESAP) Status Update	
<p>Using the guidance provided below, please provide an ESAP status update as an attachment to the Annual Environmental & Social Report. Please use the template provided under Annex 1 for the update. The ESAP for the Project is included in the Legal Documentation.</p> <p>For each ESAP action item, please complete the two steps below and note under the ESAP Status column:</p> <ol style="list-style-type: none"> Interpret your implementation status using the below guidance: OT <ul style="list-style-type: none"> Exceeding Target (ET): The project has gone beyond the requirements of the defined ESAP target and evaluation criteria within the defined timeframe. Achieved Target (AT): The project has achieved the ESAP action targets and fulfilled the evaluation criteria within the defined timeframe. On Target (OT): The project is on target for achieving ESAP action targets and fulfilling the evaluation criteria within the defined timeframe. Minor Delay (MD): The project has not achieved the ESAP action targets within the defined timetable but has put systems, processes or mitigation measure in place, which are working towards addressing the deficiencies within a reasonable timeframe. In such case please specify the new target date. Significant Delay (SD): No significant progress has been made towards achieving the ESAP action targets within the defined timeframe. In such case please specify the new target date. Not Applicable yet (NA): The defined ESAP action is not applicable yet, e.g., if the project is currently at design stage and the defined ESAP action will be applicable only during the operational stage. Comment on implementation status: Provide a brief commentary on the chosen status. For actions with delays or changes, explain the reasons for the delay or changes, actions planned to meet the requirements and estimated completion date for the action. Please note that any material change to the action plan(s) or deadlines agreed with the Bank must be satisfactory to the Bank. 	

4. General		
4.1. Have any new environmental, social or gender ¹ issues been identified which were not foreseen by or contemplated in the Environmental and Social Action Plan?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	If Yes, please provide details of the issues: Crushers were not covered in Final ESIA Report for construction phase. Their exemption certificate was obtained from PDoEU on 25.08.2017 with the stipulation of that the production duration would be less than 1 year. Dismantling date is March 2018.
4.2. Have there been any accidents or incidents that have caused damage to the environment, affected cultural property, or created liabilities for the Client?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please describe incident/accidents, damage caused by the incident/accident, including details of actions to repair and prevent reoccurrence: There were no accidents or incidents that caused damages to the environment, affected cultural property and liabilities for the Project in the year 2018.
4.3. Have there been any suspensions, closures, penalties, fines and/or corrective action plans imposed by environmental, health and safety, labour authorities on the Company or the Contractors?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please describe identified violations, including resulting penalties, status of implementing corrective actions to address any violations found: a) environmental, b) health and safety, c) labour There were no suspensions, closures, penalties, fines and/or corrective action plans imposed by environmental, health and safety, labour authorities on the Company or the Contractors in the year 2018.
4.4 Have there been any exceedances of the emission and discharge standards that apply to the project (either by regulation or as defined under the ESAP / ESMP/ EU Directives)?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please describe, including details of corrective actions: Noise emission are below 55 dBA in the day time and 45 dBA in the night time around the dwelling zone and high school. PM(10) emission levels were below 60 µg/m3 (24 hourly average) and 44 µg/m3 annually in average at the measuements around the dwelling zone and high school. Settled dust emission levels were below 390 mg/m2.day (short term level) and 210 mg/m2.day (long term emission) at the measuements around the dwelling zone and high school.
4.5 Have there been any court cases filed or determined against the Client in the reporting period that are related to labour, health and safety, environment, land acquisition, damage to third party assets, etc.?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, how many? a) Labour 0 b) Health and safety c) Environment d) Land acquisition/resettlement e) Damage to third party assets f) Others Please also provide brief information about the cases. The court cases in Dec 2017 was compromised between the subcontractor of EPC Contractor and their workers in arbitration/mediation office and came to a solution. There was no court case in 2018.

¹ Within the Bank's Environmental and Social Policy, "social" refers to those issues which pertain to project-affected people and their communities and workers and related to socioeconomic status, vulnerability, gender identity, human rights, sexual orientation, cultural heritage, labour and working conditions, health and safety and participation in decision making.

5. Human Resources Management

Unless otherwise noted, the questions in this section apply to both direct employees and non-employee workers (e.g. contractors and other 3rd party employees working on the project site or performing work directly related to the core functions of the project).

	Total	Recruited in the reporting period	Dismissed in the reporting period
Number of direct employees:	Men: 4879 Women: 46	Men: 3816 Women: 28	Men: 11 Women: 0
Number of contracted workers:	Men: 4649 Women: 35	Men: 3644 Women: 22	Men: 11 Women: 0
Number of seasonal/temporary workers:	Direct Employees: Men: 314 Women: 0	Contracted Workers: Men: 300 Women: 0	
Number of employees:	International (%) 0	National (%) 100	Local (%)² 41.5
5.1. Were there any collective dismissals as defined in article 1 of EU Directive 98/59 ³ and/or as defined in the national labour code affecting the directly employed workforce during the reporting period?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please describe the redundancy plan, including reasons for redundancies, number, sex and age of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of redundancy: No collective dismissals in the reporting year.	
5.2 Are any collective dismissals planned for the directly employed workforce in the next year?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please describe the redundancy plan, including reasons for redundancies, number, sex and age of workers involved, and selection and consultation process: Not planned for the year 2019.	
5.3. Were there any changes to: <ul style="list-style-type: none"> worker representation at Client facilities? status of collective agreements? 	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please provide details, and summarise engagement with workers, worker representatives, and relevant state authorities during the reporting period: Not applicable for the Project for the reporting period.	
5.4. Have workers raised any grievances concerning the project, Client, or contractors including working conditions or any type of discrimination, harassment or bullying during the reporting period?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	If yes, please state how many complaints were made and through which channels the issues were raised (e.g. grievance mechanism, trade unions, courts, media, etc.); report number of grievances by male and female staff and explain how the Client has addressed them: The number of grievances were 2 (for the year 2016), 79 (for 2017) and 335 (for 2018). The grievances increased last year due to the corrective actions of the labour audit. No grievances were reported related to discrimination, harassment or bullying. The grievance plan was updated within the year and communicated to whole Project staff. After then the grievances started to increase. The main grievances were related to meals (88 ea), labour rights (75 ea) & the accommodation facility (30 ea) requests.	
5.5 Have there been any strikes or other collective disputes related to working conditions at the Client in the reporting period?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please summarise nature of, and reasons for, disputes and explain how they were resolved Not applicable for the Project for the reporting period.	

² From directly affected/neighbouring communities

³ <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31998L0059&from=EN>

6. Health and Safety (H&S) Data

6.1	<p>Please provide information on any accidents / incidents that have happened to employees, contactors or other third parties during the reporting period? Please confirm circumstances, severity of the accident (fatal, serious, minor etc.), status of investigation and remedial action taken.</p> <p>RA in 2018: 32. LTA: 26. LWD: 520. TRIR (in 2018): 2.06. There were no serious accidents in the year 2018. The accident causing highest LWD was a slipping and falling case which was resulted in a fracture around the neck and causing an LWD of 60 days.</p>
6.2	<p>Please provide information on the H&S training provided to employees or contactors during the reporting period? Please provide the training topics and the numbers of workers that have been trained.</p> <p>Legal OHS Training (16 hrs/yr), Induction & Orientation Tr. (4 hr), Professional Competency Tr., First Aid Tr., Env. Tr., Job Specific Tr. (lifting, rigger, etc.). The total number of attendees was 15,141 for 152,565 man.hr training period.</p>
6.3	<p>Please provide information on the number of H&S inspections / audits which have been carried out during the reporting period? Please confirm if these were carried out by the Client or by an independent OSH expert and if any actions are outstanding.</p> <p>There were 48 H&S inspections management level by SPV, EPC and the Project Consultant. There were no serious observations as outstanding.</p>
6.4	<p>Please provide information on any major developments and achievements related to H&S management during the reporting period? Please include new safety measures which have been introduced, safety awards which the project has received or safety programmes / initiatives that have been introduced.</p> <p>(1) No serious incident resulted in loss of limb. (2) No major environmental incident (3) No administrative fine / penalty case from the authorities.</p> <p>Safety award system was in place for workers. Hundred (100) workers were awarded for their safety performance; respect to H&S and use of PPE. Four of subcontractors were awarded with the criteria of having no accident and less number of non-conformities.</p> <p>One main target in the year of 2019 is to equip the Project site with posters and banners to increase the attention of the workers for H&S issues.</p>
6.5	<p>Please provide information on the road traffic collisions that have happened to employees or contactors during the reporting period including the number of accidents, fatalities, major injuries, minor injuries, damage only and the investigative process undertaken. Summarise remedial action taken.</p> <p>No traffic accident for the reporting year.</p>

7. Stakeholder Engagement

7.1 Please provide information on the implementation of the stakeholder engagement plan agreed with EBRD and summarise interaction with stakeholders during the reporting period, including:

- meeting or other initiatives to engage with members of the public or public organisations, civil society, communities, including vulnerable groups during the report period. Please describe how you have made such meetings and interactions accessible to both men and women of all ages, all social groups, and those who speak minority languages.
- Summarise any coverage in media on environmental, health and safety and social issues related to the project, and,
- interaction with any environmental or other community groups.

Please describe any changes to the Stakeholder Engagement Plan:

Headman of the district was visited on 19.11.2018. Additionally, two high school managers were visited on 15.11.2018. Possible project effects were discussed with them. EPC Contractor will arrange career days in 2019 for the last year students.

7.2 How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group and by issues and provide status update on % of resolved and unresolved complaints. Summarise main issues raised in the complaints or grievances and explain how they were resolved:

There were no grievances raised by the public or the affected community within the year of 2018. In the perobject life, there was only one complaint from public in the year 2016.

7.3 What information on environmental and social issues was put in the public domain during the reporting period? Please attach a copy or the link.

The ESIA, NTS, ESAP and Emergency Response Plan were included in the website of the Client/SPV both in Turkish and English at <http://gaziantepihcproject-com.jimdo.com/>. The Emergency Response Plan is only in Turkish.

The updated version of the grievance plan and the fillable form were placed to the website of the Client in 2018. When the form is filled, an e-mail drops to the mailbox of the Environmental and Social Manager of the Client.

Is the project Categorised A by the EBRD?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please provide a link to the annual report released to the public for EBRD to include on the EBRD website. https://gaziantepihcproject.com/
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PART B. QUESTIONS FOR PROJECTS WITH SPECIFIC CONDITIONS

8. Water Use and Efficiency

Does the project involve production or manufacturing with a high water demand (greater than 5,000 m ³ /day)?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please provide answers to the following:
Total volume of water drawn from water source(s) in m ³ during the reporting period	Total: 18,807 m³ per year (2018) - City Network: 78,683 m³/year and Wellwater: 3,124 m³/year	
Total volume of potable water drawn from water source(s) in m ³ during the reporting period (if available)	City Network; 78,683 m³/year	
Total units of production/manufacturing (please define the units in the response)	NA	
Water source (well, water network, etc.)	City network and wellwater / groundwater (for dust suppression).	

9. Greenhouse Gas (GHG) Emissions

Are the direct and indirect ⁴ GHG emissions of the project more than 25,000 tonnes/year CO ₂ -equivalent?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	If yes, please quantify these emissions in accordance with EBRD Methodology for Assessment of Greenhouse Gas Emissions ⁵ . Please provide the data and assumptions on which the calculations are based: Total CO₂ Emission = 242.4 tonnes/yr (Total Natural Gas=237 tonnes/yr + Fuel Oil=5.4 tonnes/yr). The
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⁴ Indirect emissions from the grid electricity

⁵ <http://www.ebrd.com/downloads/about/sustainability/ghgguide.pdf>

calculation taken from
["https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator"](https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator)

10. Land Acquisition

Was there any land acquisition associated with the project during the reporting period?

Yes: No:

If yes, please provide answer to the following:

Number of communities affected:	NA. The land was the property of Treasury
Number of people affected:	land owners: NA land users: NA
Have any persons been physically displaced? If yes how many?	NA
Permanent land use:	number of parcels: One area affected: 330,091 m2
Temporary land use:	number of parcels: area affected: NA
Overall Status of land acquisition:	land acquired through: amicable agreements: NA court process: NA

Is there a Resettlement Framework/ Resettlement Action and/or Livelihood Restoration Plan (RAP/LRP) developed for the Project?

Yes:
No:

If yes, **please attach an implementation report** including any further progress made during the reporting period in the implementation of the plan, using the monitoring indicators as detailed in the plan. Please provide the results of any other related monitoring carried out by the Client or its consultants and attach any additional information you think would be useful.

11. Gender

Is there a Gender Action Plan (GAP) developed for the Project?

Yes:
No:

If yes, **please attach an implementation report** including any further progress made during the reporting period in the implementation of the plan, using the monitoring indicators as detailed in the plan. Please provide the results of any other related monitoring carried out by the Client or its consultants and attach any additional information you think would be useful.

13. Community Development

Please summarise the social or community development initiatives undertaken by the Client during the reporting period, and associated expenditure: Comment on whether the community has input into the selection of initiatives to be supported.

In December 2018, a champaign was organized for the voluntary staff by the EPC Contractor and Turkish Red Crescent, as sampling of blood for stem cell in order to be used for the treatment of leukemia patients worldwide. Plus "a career day for students".

Annex 1. ESAP Status Update template

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Implementation Status (ET, AT, OT, MD, SD, NA) ⁶	Comment on Implementation Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues							
1.1	Client to add ESAP actions as they appear in the legal documentation.	Client to add ESAP actions as they appear in the legal documentation.	Client to add ESAP actions as they appear in the legal documentation.	Client to add ESAP actions as they appear in the legal documentation.	Client to add ESAP actions as they appear in the legal documentation.	Client to add ESAP actions as they appear in the legal documentation.	Client to complete	Client to complete
PR2	Labour and Working Conditions							
2.1								
PR3	Resource Efficiency and Pollution Prevention and Control							
3.1								
PR4	Health and Safety							
4.1								
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement							
5.1								
PR6	Biodiversity and Living Natural Resources							
6.1								
PR7	Indigenous People							
7.1								
PR8	Cultural Heritage							
8.1								
PR10	Information Disclosure and Stakeholder Engagement							
10.1								

⁶ Please see Section 2 for the definitions.

Annex 1. ESAP Status Update Template

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Implementation Status (ET, AT, OT, MD, SD, NA) ¹	Comment on Implementation Status
	Pre-investment Phase							
PR1	Assessment and Management of Environmental and Social Impacts and Issues							
1.1	<p>Environmental and Social Management System (ESMS)</p> <p>A clear and functioning stand-alone ESMS is required that clearly defines the Project's E&S system (including for the implementation of the environmental, health, safety and social plans) to include the following aspects:</p> <ul style="list-style-type: none"> The ESMS will be developed and implemented in line with international good practice and guidelines including: ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007. A clear organisational structure for the implementation of the ESMS (both for construction and operation) to be developed. The structure should clearly show Environmental, Health and Safety (EHS) roles and responsibilities. Appointment of a qualified Environmental, Health and Safety and Social Manager at SPV level throughout both construction and operation to monitor and implement to implement the ESMS; and be accountable for the Project's (and its contractors/suppliers') compliance with Lenders' E&S standards. <p>The Project already has several Management Plans in place for construction. They must be revised to ensure all relevant mitigation measures outlined in the overall Project ESMMP are incorporated.</p>	To set up the environmental and social framework to manage that the identified mitigation measures for the environmental and social risks and impacts are in place.	EBRD PR1, PR2 IFC PS1, PS2 EIB Standard 1 & 8 Best practice IFC General EHS Guidelines	EPC / EPC JV Contractor Construction Site Manager Oversight by Gaziantep IHC SPV	Prior to financial close. The ESMS will be implemented throughout construction phase.	An approved ESMS and the corresponding system in place. Management Plans in place. Review of ESMS and Management Plans and other ESMS documentation by the Lenders' Technical Advisors (LTA). Implementation audits and records of staff receiving relevant documentation, policies, code of conduct and procedures.	AT	The Project ESMS (Rev.02 dated 31.08.2017) was shared to LTA on 07.9.2017. Environmental And Social Manager was employed at SPV organisation as of 10.07.2017 to implement the ESMS and to monitor environmental and social impacts in the Project.
1.2	<p>Contractor Compliance</p> <p>Include clauses in contracts requiring compliance with Project HR Policy, ESMMP, all Management Plans linked to the ESMMP.</p>	To allow the contractors and contracted workers reach the information and documentation to be familiar and to apply the requirements of the Project.	EBRD PR1, PR2 IFC PS1, PS2 EIB Standard 1 & 8 Best Practice	Gaziantep IHC SPV Management	Prior to financial close	Review of contracts by the LTA to ensure that contains appropriate clauses that require contractors and sub- contractors to comply with EHS requirements and actions set out in the ESIA and ESMMP in line with Lender requirements.	AT	LTA has been reviewing the contracts of the contractors monthly in their site visit for environmental and social compliance to the Project plans.

¹ Please see Section 2 for the definitions.

Annex 1. ESAP Status Update Template

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Implementation Status (ET, AT, OT, MD, SD, NA) ¹	Comment on Implementation Status
1.3	<p>EHS Training</p> <p>EHS training to be provided to all Project staff and contractors in EHS, Workers' Code of Conduct and relevant management plans and procedures.</p>	To provide the mandatory and necessary trainings to the Project staff and contractors to communicate the policies, plan and procedures of the Project in EHS and labour rights and working conditions and in a healthy and safe working environment and to improve their knowledge and their respect accordingly.	EBRD PR1, PR2 IFC PS1, PS2 EIB Standard 1 & 8 Best Practice	EPC / EPC JV Contractor EHS Manager	Prior to deployment of staff & continuously, as needed	<p>Training programme records and numbers of employees receiving training.</p> <p>Evidence of how Code of Conduct distributed to workers.</p> <p>Training materials.</p>	AT	The EHS training information has been provided to LTA with monthly construction reports.
1.4	<p>Tri-generation plant / boiler and concrete batching plant</p> <p>The SPV should seek the official opinion of the Gaziantep Provincial Directorate of Environment and Urbanisation (PDoEU) for EIA exemption and if an EIA is required,</p> <p>Project Information Files (PIFs) for these facilities should be prepared and submitted to Gaziantep PDoEU in accordance with EIA regulation.</p>	To comply with the requirements of national EIA regulation.	Best practice, National EIA Law	Gaziantep IHC SPV Management	Immediately	<p>An opinion letter will be obtained from Gaziantep PDoEU if facilities are exempt from EIA.</p> <p>If an EIA is required, final approval and permit will be obtained and shared with Lenders and LTA</p>	OT	The tri-generation plant / boiler system was evaluated in the EIA Application Documentation which was approved by the Ministry of Environment And Urbanization (MoEU) with their decision as "EIA Positive" by their letter dated 06.03.2017 and with number 58003700-220.01-E-3611.
1.5	<p>Turkish EIA exemption</p> <p>The SPV is required to obtain formal opinion and confirmation from the Ministry of Environment and Urban Planning (MEUP) that the Project does not fall within the scope of Annex 1 or 2 of current EIA legislation.</p> <p>The completion of this action will be subject to either the decision of the Turkish Competent Authority and that no EIA is required; or to the satisfactory conclusion of the national EIA process provided that an EIA is required under national law.</p>	To comply with the requirement of national EIA regulation.	National EIA Law	EPC / EPC JV Contractor Construction Site Manager	Prior to first financial drawdown	SPV is obtaining EIA Exemption Letter.	ET	The EIA Application Documentation of the GHIC Project was evaluated by the Ministry of Environment And Urbanization (MoEU) and approved as "EIA Positive" by their letter dated 06.03.2017 and with number 58003700-220.01-E-3611.
1.6	<p>Seismic Risk</p> <p>Design the Project in accordance with Turkish regulations and standards for protection against seismic activity.</p> <p>Comply with the Regulation on Buildings to be constructed in Seismic Zones and take into account the defined parameters to be used in the design of structures located in 3rd degree seismic zone where the Project site is located.</p>	To comply with the national legislative requirement.	National legislation Best practice	EPC / EPC JV Contractor	Prior to construction phase	Design records.	ET	No seismic isolators are incorporated in the design as the Project is within Seismic Zone 3 due to the formal letter The Ministry of Health which states that seismic isolators are not required if the construction site falls within Seismic Zones 3 or 4.

Annex 1. ESAP Status Update Template

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Implementation Status (ET, AT, OT, MD, SD, NA) ¹	Comment on Implementation Status
1.7	<p>Permitting</p> <p>Prepare and implement a Legal and Other Requirements Determination and Compliance Register.</p> <p>Determine legal permits/consents/approvals needed to be obtained and identify existing gaps. Prepare a 'Legal and Other Requirements Follow-up' List covering permits/consents/approvals.</p> <p>Obtain all necessary outstanding permits.</p>	To comply with the national and international legislative requirement.	EBRD PR 1, IFC PS 1, EIB Standard 1, National legislation	EPC / EPC JV Contractor and Gaziantep IHC SPV.	Prior to date on which relevant permit is required for construction activity	<p>A written and approved 'Legal and Other Requirements Determination and Compliance Register and comprehensive 'Legal and Other Requirements Follow-up List'.</p> <p>Records of permits, official letters, approvals, etc.</p>	ET	<p>The Project secured EIA Positive decision dated 06 March 2017 by the authority.</p> <p>The Construction Permit was secured on 13 April.</p> <p>The other permits are in place.</p>
1.8	<p>Construction Methods</p> <p>Prepare a Construction Management Plan which outlines construction methods for major construction activity.</p>	To comply with the performance requirement and standards.	EBRD PR1, IFC PS1, EIB Standard 1	EPC / EPC JV Contractor Site Manager	Prior to financial close	<p>Construction Management Plan in place.</p> <p>Lender / LTA review</p>	AT	
PR2	Labour and Working Conditions							
2.1	<p>Human Resources Policy</p> <p>Ensure HR Policy currently in place for SPV and EPC contractor staff are in line with EBRD PR2, IFC PS2 and EIB Standards 8&9 for both construction and operation phases. The HR Policy will apply to all contractors and contract staff.</p> <p>Ensure that all workers (including full, part-time, short term) are aware of its content.</p> <p>Ensure the Policy states commitments to equal opportunity and allowing workers to join a trade union as well as a commitment to engage with union representatives when required.</p>	To communicate the legal fundamental labour principles including the equal opportunity and freedom of association and labour rights to both the Project workers and the contractor workers.	EBRD PR2, IFC PS2, EIB Standard 8 & 9	EPC / EPC JV Contractor with oversight by Gaziantep IHC SPV	Prior to financial close	<p>HR Policy document review by Lenders and LTA.</p> <p>Records of distribution and training to staff on the HR Policy and their rights.</p> <p>HR Policy displayed on selected notice boards around the site.</p>	ET	Corporate Social Responsibility Policy can be reachable on http://www.ccnholding.com/sayfalar.asp?LanguageID=1&cid=2&id=9&id2=318 .
2.2	<p>Worker contracts for EPC contractor and other contractors</p> <p>Develop worker contracts that are compliant with the overall requirements of EBRD PR2/IFC PS2/EIB Standard 8 and ILO core labour standards.</p>	To make an agreement between the employee and the employer about the period, salary conditions, benefits, conditions of the work, etc with the guidance of the local law and performance requirement and standards.	EBRD PR2, IFC PS2, EIB Standard 8	Gaziantep IHC SPV E&S Manager, EPC / EPC JV Contractor Site Manager	Develop template prior to financial close	Template contracts available for review by LTA.	ET	<p>Worker/labour contracts were reviewed during the Labour Audit on September 2017 by the Independent Labour Auditor. This review was repeated in the follow-up audits on March and June 2018.</p> <p>Additionally, Internal Audit Team also reviews the labour contacts during their internal subcontractor audits.</p>

Annex 1. ESAP Status Update Template

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Implementation Status (ET, AT, OT, MD, SD, NA) ¹	Comment on Implementation Status
2.3	Workers' Accommodation Develop a Workers' Camp Management Plan detailing how provisions will be made for compliance with Lender performance requirements and EBRD/IFC Guidelines for Temporary Accommodation.	To provide a clean and safe accommodation place at which basic or minimum needs are provided or reachable for the workers who accommodate temporarily in the Project owned facilities to meet with the expectations of the best practice (Guidance Note).	EBRD PR2, IFC PS2, EIB Standard 9 EBRD/IFC Guidelines for Temporary Accommodation	EPC / EPC JV Contractor Site Manager	Prior to financial close	Workers' Camp Management Plan in place. Review by LTA.	ET	Worker's Accommodation Plan was published on 01.04.2016 with a checklist. The inspection period is twice a month.
2.4	Worker Grievance Mechanism Develop a worker grievance mechanism in line with EBRD PR2 / IFC PS2 and EIB Standard 8 and 10. Commit to resolving grievances within specified timeframes. Commit to taking action to prevent recurrence of grievances where appropriate.	To set up a system at which the workers can communicate their concerns about the labour rights and working conditions in the workplace and get back the feedback about the resolution of their concerns.	EBRD PR2, IFC PS2, EIB Standard 8	EPC / EPC JV Contractor Site Manager with oversight by the Gaziantep IHC SPV Management	Prior to financial close	Grievance mechanism in place. Review by LTA. A grievance log that contains grievances, date received, person responsible, action taken and date resolved or escalation.	ET	Grievance Plan of the project was revised on 31.05.2018 reflecting the requirements of EBRD PR2, IFC PS2 and EIB Standard 8 and 10.
2.5	Occupational Health and Safety Develop an Occupational Health and Safety Plan to identify health and safety risks of each activity during construction followed by identification of appropriate mitigation measures, including Emergency Response Measures. The Plan is to be communicated to all subcontractors and subcontractor workers; and updated as necessary. Set up a centralised Reporting System on any OHS related accidents in the Gaziantep IHC SPV and in contractors while performing tasks for the Project. Appoint an Occupational Health & Safety Manager for construction with clearly defined responsibilities. Provide first-aid training to relevant workers as required by national legislation. Provide safety and induction training to workers.	To comply with the requirement of the Health and Safety Law and the performance requirement and standards to identify and to manage the health, safety and environmental hazards of the Project and their risks to protect the workers against any incident / accident or occupational disease.	EBRD PR2, IFC PS2, EIB Standard 9 National legislation	EPC / EPC JV Contractor Site Manager	Prior to financial close	OHS Plan in place. Records of incidents, accidents and near misses, hours worked and man-hours lost. Records of training received by staff including number of participants. Written evidence in the form of a report must be provided. OHS manager in place	AT	The Health and Safety Plan was finally revised on 31.03.2018 with revision number 06. EPC Contractor appointed Health And Safety Manager in August 2017, while EPC Subcontractor has HSE Management Representative since the beginning of the Project. All the documentation was provided to the sub-subcontractors as the attachment of their contract. All the staff and employees are taken to the HSE and Labour induction and orientation training in the training center. In addition to the induction and orientation training, legal safety experts of each contractor / subcontractor give Legal safety Training to the new staff before stating to work and with quarterly periods.
2.6	Legal Content Include a policy statement that demonstrates commitment to promote and support local employment and purchasing / procurement.	To comply with the performance requirement and standard.	EBRD PR2, IFC PS2	EPC / EPC JV Contractor Site Manager	Prior to financial close	Policy review by LTA.	AT	There are the lists of approved contractors and approved vendors.
PR3	Resource Efficiency and Pollution Prevention and Control							

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3.1	Waste / Wastewater Obtain necessary permits related with the disposal of wastes (eg. Excavated soil, wastewater etc.)	To dispose the wastes and wastewater to the permitted receiving bodies by means of licensed vehicles.	EBRD PR3 IFC PS3 EIB Standards 1&2 Best Practice	EPC / EPC JV Contractor	Prior to construction phase	Official correspondence with the relevant authorities.	AT	Sewage line connection temporary permit for construction was granted on 18.07.2018. On the other hand, water line connection permit from the local authority was obtained on 06.04.2016.
3.2	Noise Obtain necessary permits related with night time construction if night time construction is required.	To obtain night time construction permit from the local authorities and to monitor the noise emitted from the construction site at night time to keep within the acceptable limit values.	EBRD PR3, IFC PS3, EIB Standard 2 National legislation	EPC / EPC JV Contractor	Prior to night time construction	Official correspondence with the relevant authorities. Necessary Permit / approval in place.	AT	Night time construction permit was secured on 01.08.2017 by the District/Local Environmental Committee.
3.3	Greenhouse Gases Conduct an analysis of the selected tri- generation plant compared to other heating and power options to evaluate the GHG performance.	To design a tri-generation plant with acceptable emission values for the best GHG performance.	EBRD PR3 IFC PS3, EIB Standard 4	Gaziantep IHC SPV Management	Prior to purchase of tri-generation plant and prior to financial close	Lender/LTA review.	OT	Please refer to the EIA for GHIC Volume I Final, September 2016 Section 6.4.4.
PR4	Health and Safety							
4.1	Emergency Response Ensure Emergency Preparedness and Response Plan is compliant with the provisions of EBRD PR4, IFC PS4 and EIB Standard 9. The Emergency Preparedness and Response Plan shall be shared with the community and local authorities.	To establish the emergency preparedness and response system which identifies the potential hazardous situations that may result in harm to the people and the community and damage to the environment and property and maintains the system with the mitigation measures and ready to respond to any incident / accident if they happen with a trained and practiced response team.	EBRD PR4, IFC PS4, EIB Standard 9 Best practice	EPC / EPC JV Contractor Site Manager	Prior to financial close	Lender / LTA review of existing Plan. A written statement and photographic evidence of engagement with local authorities and the community, demonstrating Plan has been shared. The Plan will also be shared on the SPV website.	AT	Emergency Response Plan, Rev.05 dated 28.05.2018, was recently shared to two High School Managers and Ibni Sina District Officer (Muhtar) in their visits on respectively 15.11.2018 and 19.11.2018.

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4.2	<p>Security Management</p> <p>Security Management Plan will be developed aligned with the principles of EBRD PR4, IFC PS4 and EIB Standard 9. Personnel needs shall be vetted for past criminal offences, use of force and human rights violations.</p> <p>Ensure the Plan incorporates the Voluntary Principles on Security and Human Rights, UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, the UN Code of Conduct for Law Enforcement Officials and the International Code of Conduct on Private Security Providers.</p> <p>The Plan will also detail the company's position on the use of force, training, equipping and monitoring security guards as well as investigating reports of unlawful behaviour and preventing recurrence for the Project for both construction and operational phases.</p>	To establish the security management plan, with the objective of providing safeguarding to the personnel and property in reference to the best practice, with the security personnel trained on use of force and appropriate conduct to the workers and the local community.	EBRD PR4, IFC PS4, EIB Standard 7&9 National legislation Best practice	EPC / EPC JV Contractor Site Manager with oversight by Gaziantep IHC SPV	Prior to financial close	Review of Security Management Plan by Lenders / LTA. Written evidence of personnel vetting process will be provided.	AT	The security personnel gets the behaviours training during the certification course. The information available in the training documentation of the security sub-contractor.
4.3	<p>Life and Fire Safety</p> <p>Implement a third party life and fire safety audit and appoint a Life and Fire Safety Expert (third party) acceptable to Lenders to oversee the preparation and implementation of a Life and Fire Safety Master Plan.</p> <p>The Plan will ensure that the Project must be designed, constructed and operated in compliance with national building requirements (Official Gazette 26735 Dated 19.12.2007), local fire department regulations, national legal/insurance requirements and in accordance with internationally recognised Life and Fire Safety Code.</p> <p>The Plan will incorporate a Corrective Action Plan if remediation measures are to be implemented to comply with internationally accepted life and fire standards (e.g. NFPA Standards, IBC Codes and EN Standards).</p> <p>The Plan and relevant future appointments will be shared with Lenders.</p> <p>A Life and Fire Safety Expert will be appointed prior to financial close. They will be responsible for the review of systems and commissioning and certify that the construction of the life and fire safety system has been carried out in accordance with the accepted design and master plan as the Project develops post financial closure and throughout construction.</p> <p>The SPV must have regular maintenance and operational checks of life and fire safety provisions. All provisions for disability access are in place in compliance with international standards.</p>	To comply with the fire regulation and performance requirement and standards and best practice with the implementation of L&FS Master Plan and appointing a Life & Fire Safety Expert (third party) to certify that the construction of L&FS systems are in accordance with the accepted design and master plan.	EBRD PR4, IFC PS4, EIB Standard 9 NFPA	Gaziantep IHC SPV Management	Prior to first disbursement and construction	Third party audit Design certification.	OT	<p>KARINA Design, Consultancy and Training Services Ltd. Co. was contracted as the Life And Fire Safety Consultant, as a third-party consultant.</p> <p>The consultant prepared a Peer-Review Report in 21.02.2017.</p> <p>The report contains the compliance checklist and the corrective actions list.</p> <p>To comply the corrective action is ongoing.</p>

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4.4	Workers' Conduct A Workers' Code of Conduct will be implemented to guide / manage worker interactions and behaviour outside the camp with local residents as well as behaviour on the construction site and in the camp.	To comply with the performance requirement and standards.	EBRD PR4, IFC PS4, EIB Standard 9	Gaziantep IHC SPV applicable to EPC / EPC JV Contractor Site Manager and all other contractors	Prior to construction	Workers' Code of Conduct in place and available on notice boards around the site. Records of training received by workers on the Code of Conduct.	AT	Necessary information related to the interactions and behaviour of workers with each other and with the surrounding community are on the notice boards of the Camp area.
4.5	Perimeter Fence As part of the Construction Management Plan, a perimeter fence will be extended across boundary with TOBB High School.	To comply with the Construction Management Plan for securing the boundary with fence including the High School.	EBRD PR4, IFC PS4, EIB Standard 9	EPC / EPC JV Contractor Site Manager	Immediately	Fence in place.	ET	A noise barrier was installed over the wall between the construction area and the high school in July 2017. The barrier has sufficient height to prevent any possible movements from the high school area to the construction area.
PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources							
6.1	Threatened Species Undertake check surveys prior to any construction activity for the presence of spur-thighed tortoise and relocate any individuals to suitable nearby habitat outside of the Project site boundary.	To monitor the presence of spur-thighed tortoise prior to the construction.	EBRD PR6, IFC PS6 EIB Standard 3	EPC / EPC JV Contractor Site Manager	Immediately	Records of surveys. Review by LTA.	ET	There is no any finding with the species.
PR8	Cultural Heritage							
8.1	Chance Finds Ensure that the Archaeological Chance Finds Management Procedure is implemented and all workers are trained and understand its contents.	To monitor the presence of any archaeological chance finds in the construction area.	EBRD PR8, IFC PS8, EIB Standard 5 National legislation	EPC / EPC JV Contractor Site Manager	Prior to financial close	Records of training and distribution of Procedure.	ET	The Archaeological Chance Finds Procedure is implemented. There is no any finding about the chance finds.
PR10	Information Disclosure and Stakeholder Engagement							
10.1	Safety Engagement Undertake regular safety awareness campaigns with local residents and the school and teachers of TOBB High School. Awareness raising campaigns will focus on road traffic, construction activities and the presence of workers and security services. Public announcements will be made and safety information distributed through leaflets to local residents, social centres and neighbourhood Muhtars	To establish a safety aware system for the nearby residents, communities and High School to increase their awareness about the risks and impacts of the Project affecting them.	EBRD PR4, PR10, IFC PS4, PS1 EIB Standard 9 & 10	EPC / EPC JV Contractor Site Manager	Prior to construction	Records of safety meetings and announcements. Leaflet distribution records.	AT	Emergency Response Plan, Rev.05 dated 28.05.2018, of the Project was recently shared to two High School Managers and Ibni Sina District Officer (Headman / Muhtar) in their visits on respectively 15.11.2018 and 19.11.2018.
10.2	Information disclosure Information disclosure will be undertaken to publicise the ESIA, NTS and SEP on the Gaziantep IHC SPV Management website and through public announcements and in national and local newspapers. Publicise the grievance mechanism including contact details of responsible staff to address grievances.	To disclose the Project information including the grievance mechanism through the website of Gaziantep IHC SPV, public announcements and in national and local newspapers.	EBRD PR10, IFC PS1, EIB Standard 10	Gaziantep IHC SPV Management EPC / EPC JV Contractor Site Manager	1 September 2016 for disclosure and updated ESIA, NTS and SEP prior to signature	Records of disclosure. Information on website. Update of ESIA, NTS and SEP to integrate comments received following disclosure.	ET	The Project information, the ESIA, NTS and SEP and grievance mechanism are on the link of the Gaziantep IHC SPV Website; http://gaziantepihcproject.com.jimdo.com/ or https://gaziantepihcproject.com/

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10.3	Stakeholder Engagement Plan Update the SEP as Project moves into construction phase and as relevant following disclosure.	To update the Stakeholder Engagement Plan to comply the with the performance requirement and standards.	EBRD PR10, IFC PS1, EIB Standard 10	EPC / EPC JV Contractor Site Manager	Prior to construction	SEP review by LTA.	OT	The SEP information can be reachable in the link of the of the Gaziantep IHC SPV Website; http://gaziantepihcproject-com.jimdo.com/ or https://gaziantepihcproject.com/
Construction Phase								
PR1	Assessment and Management of Environmental and Social Impacts and Issues							
1.1	ESMS EHS Training Develop a Project specific ESMS and EHS training programme. Training will be provided on the Project specific ESMS that will include, at a minimum, training all core ESMS management plans. Organisational chart to be updated. Appointment of a qualified Environmental, Health and Safety and Social Manager at SPV level throughout both construction and operation to monitor and implement to implement the ESMS; and be accountable for the Project's (and its contractors / suppliers') compliance with Lenders' E&S standards	To develop the ESMS for the Project and to implement and to provide training to the Project staff and contractors to communicate the policies, plan and procedures of the Project in EHS and labour rights and working conditions and in a healthy and safe working environment and to improve their knowledge and their respect accordingly.	EBRD PR1, PR2, IFC PS1, PS2, IFC EHS Guidelines, EIB Standards 9	EPC / EPC JV Contractor Site Manager	The ESMS / ESMMP will be implemented throughout the construction phase	Review of documentation. Records of worker training and information on notice boards around the site. Updated organisational chart.	AT	The Project ESMS (Rev.02 dated 31.08.2017) was shared to LTA on 07.9.2017. Environmental And Social Manager was employed at SPV organisation as of 10.07.2017 to implement the ESMS and to monitor environmental and social impacts in the Project.
1.2	ESMS / ESMMP Compliance Monthly progress reporting to EBRD / EIB on ESMMP implementation	To provide monthly updates about the progress on the ESMS / ESMMP to EBRD / EIB by means of the Lenders Technical Advisor.	EBRD PR1, IFC PS1, EIB Standard 1	Gaziantep IHC SPV Management	During construction phase	Monthly progress reports to be provided to Lenders.	AT	LTA has been monitoring the compliance to environmental and social actions and reporting in their monthly progress reports.
1.3	Permitting All necessary outstanding permits / approvals / consents will be obtained as identified in the 'Legal and Other Requirements Follow-up List'. Prior to installation of the tri generation plant and boilers, the SPV will ensure that official opinion of the Gaziantep PDoEU has been obtained and necessary PIFs prepared and submitted in accordance with EIA regulation.	To comply with the national and international legislative requirement.	EBRD PR1, IFC PS1, EIB Standard 1 National legislation	EPC / EPC JV Contractor Site Manager with oversight by Gaziantep IHC SPV	During construction phase but 6 months prior to operation	Records of permits, official letters, approvals and consents.	ET	The required permits obtained as reported in the LTS's monthly progress reporting. The tri-gen plant / boiler system was evaluated in the EIA Application Documentation which was approved by the Ministry of Environment And Urbanization (MoEU) with their decision as "EIA Positive" by their letter dated 06.03.2017 and with number 58003700-220.01-E-3611.

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1.4	<p>Seismic Risk</p> <p>Undertake construction activities for protection against seismic activity in line with relevant national regulation</p>	To comply with the national legislative requirement.	National legislation	EPC / EPC JV Contractor Site Manager	Prior to / during construction phase	Construction inspection records.	ET	No seismic isolators are incorporated in the design as the Project is within Seismic Zone 3 due to the formal letter The Ministry of Health which states that seismic isolators are not required if the construction site falls within Seismic Zones 3 or 4.
1.5	<p>Hospital Management</p> <p>Discussion with the MoH about the process to apply international hospital management benchmarks and ensure international best practice.</p> <p>Agree a common hospital management benchmark.</p>	To comply with the international hospital management best practice.	EBRD PR1, IFC PS1, IFC EHS Guidelines, EIB Standard 1	Gaziantep IHC SPV Management	During construction phase	Records / minutes of discussions with MoH and agreements to be reviewed by Lenders.	OT	Discussion with LTA will be followed as the operation phase approach.
1.6	<p>Construction methods</p> <p>Provide major construction activity method statements / commitments in line with good practice and to manage and monitor construction phase environmental and social risks and issues.</p>	To comply with the performance requirement and standards.	EBRD PR1, IFC PS1, EIB Standard 1	EPC / EPC JV Contractor Site Manager	During construction phase	Lender / LTA review	OT	Project Quality Management Plan, finally revised on 19.09.2017 with revision number 05, is the frame document for this purpose.
PR2	Labour and Working Conditions							

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2.1	<p>Health and Safety</p> <p>Implement the Occupational Health and Safety Plan based on a risk analysis for the construction period using international benchmarks such as IFC EHS Guidelines for Construction and Decommissioning.</p> <p>OHS Manager with clearly defined responsibilities recruited for the construction phase.</p> <p>Develop method statements for each work activity for major construction activities.</p> <p>Ensure all construction staff is provided with adequate training and Personal Protective Equipment. OHS signs to be clearly placed on notice boards around the site.</p> <p>Ensure medical first aid on site and emergency transfer and a centralised recording and reporting system of any OHS related accidents and incidents.</p> <p>Ensure all workers are aware of who the first aiders are.</p> <p>Keep records of next of kin contact details in each worker's personnel file.</p> <p>Comply with health and safety legislation applicable to the construction phase of the Project.</p> <p>EPC Contractor safety officers to carry out regular inspections of site safety and PPE use on site.</p> <p>Ensure young people are not employed in hazardous work.</p>	To comply with the requirement of the Health and Safety Law and the performance requirement and standards to identify and to manage the health, safety and environmental hazards of the Project and their risks to protect the workers against any incident / accident or occupational disease.	EBRD PR2, IFC PS2, IFC EHS Guidelines EIB Standard 8 & 9 National legislation	EPC / EPC JV Contractor HSE Manager	During construction phase	<p>OHS Plan in place and reviewed by LTA.</p> <p>Lenders to visit the site at a minimum of once per year to undertake monitoring.</p> <p>Material OHS concerns/issues to be reported promptly to Lenders.</p> <p>Information on OHS management to be provided in annual reports.</p> <p>Inspection reports.</p>	AT	<p>The Health and Safety Plan was finally revised on 31.03.2018 with revision number 06.</p> <p>EPC Contractor appointed Health And Safety Manager in August 2017, while EPC Subcontractor has HSE Management Representative since the beginning of the Project.</p> <p>All the documentation was provided to the sub-subcontractors as the attachment of their contract.</p> <p>The consultant of MoH approved the method statements developed by the EPC Contractor for the major construction activities.</p> <p>Medical first aid team and tools are in place in the site as described in the Emergency Response Plan.</p> <p>All the staff and employees are taken to the HSE and Labour induction and orientation training in the training centre. In addition to the induction and orientation training, legal safety experts of each contractor / subcontractor give Legal safety Training to the new staff before stating to work and with quarterly periods.</p> <p>There is no proof about the employment of the young labour in the site according to the findings of internal labour audit.</p>
2.2	<p>Implement the Human Resources Plan.</p> <p>Appointment of a HR Manager for the construction phase.</p> <p>Issue contracts to all workers which comply with all the requirements of EBRD PR2, IFC PS2, EIB Standard 8.</p> <p>Develop a database of employees and subcontractor employees that includes information on age, social security number, identity card number, gender, ethnicity, nationality and home town.</p> <p>Undertake payroll checks by EPC Contractor against issues such as sub-contractor wages, payment of benefits and timely payments to workers.</p>	To communicate the legal fundamental labour principles including the equal opportunity and freedom of association and labour rights to both the Project workers and the contractor workers and to comply with the labour law and performance requirement and standards.	EBRD PR2, IFC PS2 EIB Standard 8	EPC / EPC JV Contractor HR Manager Gaziantep IHC SPV	During construction phase and maintain regularly throughout Project.	<p>Worker contracts.</p> <p>Personnel files.</p> <p>Database of employees.</p> <p>Brief quarterly reports available for review by external monitors / LTA.</p> <p>Adequate staff is hired and present to ensure the correct implementation of the human resource plan is assured.</p>	ET	<p>Internal labour audit system, based on the guidelines at EBRD PS2, IFC PS2 and EIB Standard 8, inspects the Project with respect to the human resources and labour rights and working conditions approaches.</p> <p>Corporate Social Responsibility Policy can be reachable on http://www.ccnholding.com/sayfalar.asp?LanguageID=1&cid=2&id=9&id2=318.</p>

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2.3	<p>Worker Protection</p> <p>Ensure individual and contract labour contracts comply with the requirements of Lenders.</p> <p>Ensure migrant and/or immigrant construction workers (including Syrian refugees) human rights are fully respected and receive the same benefits and wages for equivalent work to Turkish nationals.</p> <p>Ensure that there is no discrimination, no child labour and no forced labour.</p>	To make an agreement between the employee and the employer about the period, salary conditions, benefits, conditions of the work, etc with the guidance of the local law and performance requirement and standards.	EBRD PR2, IFC PS2 EIB Standard 7 & 8 National Legislation	EPC / EPC JV Contractor Site Manager Gaziantep IHC SPV	Develop prior to commencement of construction and implemented during construction phase	Monitoring through Lender / LTA specialist site visits. Records of worker grievance. Payroll data and worker contracts available for review. Annual audits to ensure no discrimination, child labour or forced labour is occurring on site.	ET	<p>Worker/labour contracts were reviewed during the Labour Audit on September 2017 by the Independent Labour Auditor. This review was repeated in the follow-up audits on March and June 2018.</p> <p>Additionally, Internal Audit Team also reviews the labour contacts during the internal labour audits.</p>
2.4	<p>Worker Grievance</p> <p>Implementation of worker Grievance Mechanism.</p> <p>Publicise Grievance Mechanism to workers and ensure information is available on notice boards.</p> <p>Respond to grievances in a timely manner, in accordance with the provisions of the Grievance mechanism.</p> <p>Undertake necessary corrective actions to prevent recurrence of grievances where appropriate.</p>	To implement the grievance system at which any stakeholder including the public can communicate their concerns disturbances related to the Project through the communication tools disclosed and to record, to investigate and to respond the grievance owner with the resolution.	EBRD PR2, IFC PS2 EIB Standard 8	EPC / EPC JV Contractor Site Manager Gaziantep IHC SPV	During construction phase	Grievance log including records of grievance and responses and / or corrective actions. The grievance log must include the person who is responsible for addressing the grievance.	ET	<p>Grievance mechanism / plan of the project was revised on 31.05.2018 reflecting the requirements of EBRD PR2, IFC PS2 and EIB Standard 8 and 10.</p> <p>There is a grievance box in the gate for the public complaints.</p> <p>The Project grievance mechanism and application tool are on the link of the Gaziantep IHC SPV Website; http://gaziantepihcproject-com.jimdo.com/ or https://gaziantepihcproject.com/</p>
2.5	<p>Workers' Accommodation</p> <p>Implement Workers' Camp Management Plan.</p> <p>If temporary accommodation is provided, it needs to comply with EBRD/IFC Guidelines for Temporary Accommodation.</p> <p>Undertake internal and external (third party) regular audits of workers' camp facilities within a frequency required by Lenders.</p>	To provide a clean and safe accommodation place at which basic or minimum needs are provided or reachable for the workers who accommodate temporarily in the Project owned facilities to meet with the expectations of the best practice (Guidance Note) and to make internal and external (3 rd party) audits to comply the performance requirement and standards.	EBRD PR2, IFC PS2 EIB Standard 9	EPC / EPC JV Contractor Site Manager Gaziantep IHC SPV	During construction phase	Audit reports. Grievance log.	ET	<p>Worker's Accommodation Plan, guided by the best practice of EBRD, was published on 01.04.2016 with a checklist. The inspection period is twice a month.</p> <p>Additionally, internal labour auditors make inspections in the camp area.</p>

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2.6	<p>Subcontractor Management</p> <p>Implementation of Subcontractor management and monitoring including checks for compliance of subcontractors with HR and EHS policies and procedures.</p> <p>Require all subcontractors to adopt the HR and EHS policies and procedures and a worker grievance mechanism through contract clauses.</p> <p>Require all subcontractors to report accidents, incidents and safety non-compliance through contract clauses.</p> <p>Include pass/fail criteria for subcontractors based on EHS performance when renewing bids.</p> <p>Carry out checks on major suppliers to inquire about lifethreatening issues, the use of child and forced labour and take necessary steps to address any issues in line with Lender requirements.</p> <p>All sub-contractors will sign an anti-corruption and responsible procurement policy or have provisions for responsible procurement in contract clauses.</p>	To establish a subcontractor management system to convey the Project related HR and EHS issues to the them, to make them be familiar about the hazards and risks of the Project, to make them ready for any emergencies and to report them and the make them be familiar about their rights and working conditions.	EBRD PR2, IFC PS2, EIB Standard 8 & 9 IFC EHS Guidelines	EPC / EPC JV Contractor Site Manager Gaziantep IHC SPV	During construction phase and prior to procurement from major suppliers. Records to be maintained regularly throughout Project.	Contracts with subcontractors Subcontractor list. Records of subcontractor non-compliance, accidents and incidents and grievance log. Subcontractor personnel files. Subcontractor training records for EHS. Records on EHS and grievance mechanism distribution. Subcontractor performance monitoring reports. Supplier audit reports.	AT	<p>EPC JV Contractor make the subcontractor agreements in written and legal form.</p> <p>Health, safety and environmental and corporate, human rights and resources documentation are provided to the sub-contractors as the attachment of the contractor agreements.</p> <p>There is the list of approved sub-contractors.</p> <p>EPV JV Contractor has the integrated management system of ISP 9001, ISO 14001 and OHSAS 18001 to manage the Project and the sub-contractors.</p> <p>Subcontractors are monitored and checked daily for HSE issues by another sub-contracted company..</p> <p>Internal labour auditing system make continuous controls over the subcontractors for HR issues.</p>
2.7	<p>Supply of Materials</p> <p>Supply materials as close as possible to the Project site.</p> <p>Supply materials from licensed/certificated suppliers/facilities.</p> <p>Prefer to the extent possible recycled materials and materials certified as 'green' and low carbon.</p>	To establish a supply chain system to supply the materials, depending on the possibility, locally, to supply them from the licenced/certified manufacturers/supplier s/facilities and to prefer the supply of materials with the certification of "green" or "low carbon" to comply with the performance requirement and standards.	EBRD PR2 IFC PS2 Best Practice	EPC / EPC JV Contractor Site Manager	During construction phase	Contracts with subcontractors. Subcontractor list. Records of subcontractor's accidents, incidents and non-compliances. Subcontractor personnel files. Subcontractor training records for EHS. Evidence of how workers are informed about the grievance mechanism. Grievance log.	OT	<p>Health, safety and environmental and corporate, human rights and resources documentation are provided to the sub-contractors as the attachment of the contractor agreements.</p> <p>There is the list of approved sub-contractors and approved vendors/suppliers.</p>
2.8	<p>Independent labour audit</p> <p>The SPV will undertake an independent labour audit to ensure the project complies with PR2 requirements.</p>	To ensure that the Project complies with the local labour law and the performance requirement and standards by means of independent (3 rd party) annual audits.	EBRD PR2 IFC PS2 Best practice	Gaziantep IHC SPV	Annual audits during construction phase	Third party audit will include key PR2 measures including contracts, health and safety, worker protection, grievance, worker accommodation, forced and child labour.	ET	Internal labour audit was held on 12-13-14 September 2017 by an independent labour auditor. After the audit, two follow-up audits were conducted respectively on 7-8-9 March 2018 and 20-21-22 June 2018.
PR3	Resource Efficiency and Pollution Prevention and Control							

Annex 1. ESAP Status Update Template

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3.1	<p>Soil, Surface Water and Groundwater</p> <p>Adopt good construction site practices for the protection of soil, surface water and groundwater (e.g. storage areas, spillage control, spill kits etc.</p> <p>Keep spill response kits at designated areas with specific instructions for their use and train site staff on the use of spill kits.</p> <p>Close the existing groundwater well at the Project site by cement grout. In case a future demand for use of groundwater occurs, obtain necessary permission from the authorities.</p> <p>Implement following plans:</p> <ul style="list-style-type: none"> • Hazardous Material Management Plan. • Emergency Preparedness and Response Plan. • Waste Management Plan. • Train construction workers on environment related practices. 	To establish a soil, surface water and groundwater protection system to prevent the spillage of the contaminants to them, to keep spill response kits at the storage or designated areas, to response the spills with trained staff included in EPR Plan, to to implement the plans relevant to the spills and to obtain the necessary permits in case to use the groundwater wells.	EBRD PR3 IFC PS3 and EHS Guidelines EIB Standard 2 Best practice National legislation	EPC / EPC JV Contractor	During construction phase / ongoing Monthly Reporting	Records of periodical site inspections. Presence of spill response kits on construction site.	AT	<p>HSE Management System Manual, Waste Management Plan, Waste Management Procedure, Instruction for Storage, Transport and Handling of Hazardous Materials, Emergency Response Plan and Spill Management Plan are in place.</p> <p>There are spill kits in the place where hazardous materials and hazardous wastes are stored.</p> <p>The emergency response staff trained for the response in case when spill occurs.</p> <p>The workers have regular training for environmental issues including “contaminating the earth and water”.</p> <p>There are three groundwater wells and the groundwater was reached only at one of them. The well has exploration and use permits respectively on 03.08.2017 and 17.11.20217. The water from the groundwater well is in usage for dust suppression in the construction roads.</p>
3.2	<p>Hazardous materials</p> <p>Implement Hazardous Material Management Plan.</p> <p>Prepare an inventory of hazardous materials.</p> <p>Obtain Material Safety Data Sheets (MSDSs) and provide in relevant locations.</p> <p>Make Personal Protective Equipment (PPE) available for relevant personnel.</p> <p>Train relevant personnel.</p> <p>Take required onsite measures.</p> <p>Keep hazardous materials at designated areas. Hazardous material storage will be in compliance with IFC Guidance</p> <p>Locate suitable fire-fighting equipment close to hazardous material storage/usage areas</p>	To implement an hazardous materials management system to obtain the SDS of the chemical, to make their inventory, to train the workers about the hazards of them, to provide the required PPE, to store them according to their classification and to provide the emergency response equipment to comply with the national hazardous materials regulations.	EBRD PR3/PR4 IFC PS3/PS4 EIB Standard 2 Best Practice National legislation	EPC / EPC JV Contractor	During construction phase	Records of audits. Hazardous material inventory. Site inspections. Incident records. Training records.	AT	<p>Instruction for Storage, Transport and Handling of Hazardous Materials, Hazardous Materials Inventory and Safety Data Sheets (SDS / MSDS) of the chemicals are in the site at required storage areas.</p> <p>Additionally, Waste Management Plan, Waste Management Procedure, Emergency Response Plan and Spill Management Plan are in place for the management of hazardous wastes.</p> <p>The staff and workers were trained to use the Personal Protective Equipment (PPE) was provided to the relevant personnel who had trained how to response to hazardous chemicals.</p> <p>Emergency eye washers were provided to the site.</p> <p>Hazardous materials and hazardous wastes are stored at the designated places which were protected and controlled storage places also equipped with fire response equipment.</p>

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3.3	<p>Waste Management</p> <p>Implement following plans:</p> <ul style="list-style-type: none"> • Waste Management Plan. • Emergency Preparedness and Response Plan. • Hazardous Material Management Plan. <p>Collect, segregate label and store, transport, recycle wastes in line with the Waste Management Plan.</p> <p>Design and construct a designated waste storage area to ensure that hazardous wastes are properly stored at the construction site.</p> <p>Dispose wastes at licensed facilities according to their category in accordance with regulatory requirements.</p> <p>Keep records of waste generation, storage and disposal.</p> <p>Use licensed haulers for the transport of wastes and keep waste transfer certificates.</p> <p>Ensure disposal of wastes at licensed facilities.</p> <p>Train site workers for waste management practices.</p>	To implement a waste management system to collect the wastes inside site, to segregate and to store accordingly and to transport them to the recycle or disposal facilities with licenced/certified haulers.	EBRD PR3 IFC PS3 EIB Standard 2 Best practice National legislation	EPC / EPC JV Contractor	During construction phase / ongoing Monthly Reporting (of Construction)	<p>Records of periodic site inspections conducted to check all wastes are separately collected, segregated, labelled and stored in designated areas.</p> <p>Disposal records of all types of wastes.</p> <p>Disposal records of excavated soil.</p> <p>Check waste disposal contracts.</p> <p>Licenses of haulers' and disposal facilities'.</p> <p>Declaration records made to the Ministry of Environment and Urban Planning (MEUP).</p> <p>Training records of staff.</p> <p>All waste transfer certificates during construction phase, and breakdown of waste quantities recycled and re- used on site and assessment against waste recycling/reuse targets provided within the Construction Monthly Progress Report.</p>	AT	<p>Waste Management Plan, Waste Management Procedure, Instruction for Storage, Transport and Handling of Hazardous Materials, Emergency Response Plan and Spill Management Plan are in place.</p> <p>The wastes are collected in the site at storage places and segregated and labelled in the waste storage place and hazardous wastes storage place.</p> <p>The wastes are transported by the licensed haulers to the disposal or recovery stations which are licensed by the Ministry of Environment And Urbanization (MoEU).</p> <p>The dispatches and official hauling dispatches are kept for filing for authority inspections.</p> <p>The workers have regular train for the wastes.</p>
3.4	<p>Wastewater</p> <p>Discharge domestic wastewater to the municipality infrastructure in accordance with the permits and protocols for connection to the municipal sewer system.</p> <p>Monitor effluent regularly if required by Gaziantep Water and Sewage Administration.</p>	To comply with the wastewater regulation for discharging the wastewater to the municipality infrastructure with the discharge permit and to monitor the effluent.	EBRD PR3 IFC PS3 EIB Standard 2 National legislation	EPC / EPC JV Contractor	During construction phase	<p>A Temporary Connection Permit has been issued by GASKI. A permanent one will be issued once the Workers' Camp is in operation. Once obtained this permit will be shared with the LTA.</p> <p>Regular effluent analysis results.</p>	AT	<p>Domestic wastewater generated from the mobilization area and camp site are discharged into the municipality sewer line with the permission secured from the local authority, GASKI, dated 18.01.2018.</p> <p>The wastewater from the toilets in the construction site are collected in the septic tanks and transferred by the vacuum trucks of GASKI to the municipality sewer line.</p>
3.5	<p>Waste / Wastewater</p> <p>Obtain necessary permits related with the disposal of wastes (e.g. Excavated soil, wastewater etc.).</p>	To dispose the wastes and wastewater to the permitted receiving bodies by means of licensed vehicles	EBRD PR3 IFC PS3 EIB Standard 2 Best Practice	EPC / EPC JV Contractor	Prior to construction	Official correspondence with the relevant authorities.	AT	The following permits were obtained; - Excavation Dumping Area Contract with Municipality, - Water Line Connection Permit from GASKI, - Temporary Sewage Line Connection Permit from GASKI.

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3.6	<p>Noise Monitoring</p> <p>Implement Noise and Vibration Management Plan.</p> <p>Obtain consent from Gaziantep Provincial Directorate of Environment and Urban Planning for undertaking any construction activities during evening and night time.</p> <p>Undertake a monthly noise monitoring programme at sensitive receptors (TOBB High School and nearby residential buildings – i.e. R4 and R5) to test effectiveness of noise reduction measures.</p>	<p>To implement the Noise and Vibration Plan to keep the noise and vibrations emitted from the construction site to the surrounding residences and the high school facility in the evening and night time within the acceptable limits, to monitor and to take necessary noise reduction measures for the High School and nearby residents.</p>	<p>EBRD PR3, IFC PS3, EIB Standard 2 Best Practice</p>	<p>EPC / EPC JV Contractor</p>	<p>During construction with ongoing monthly reporting</p>	<p>Monthly noise monitoring report.</p> <p>Necessary approval letter/permit for night time and evening work.</p>	<p>AT</p>	<p>Noise Management Plan is in place and implemented.</p> <p>Working permit for undertaking the construction activities during evening and night time was obtained from Gaziantep Local Environmental Council on 01.08.2017.</p> <p>Noise measurements are carried out as two days in each month at two sensible receptors located around TOBB High School and local residents by an independent and TURKAK (Turkish Accreditation Agency) approved. The two sensitive receptor locations are in accordance with Regulation on the Assessment and Management of Environmental Noise.</p> <p>The ambient noise measurement results of the corresponding two sensitive receptor locations, for both day time and night time hours, have lower values than the project specific concerned noise limit values specified in final ESIA report of the Project.</p> <p>Although the noise measurement results are in compliance with the project specific noise limit values, as a mitigation measure a noise barrier was installed along high school border next to the project site.</p>

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3.7	<p>Air Emissions</p> <p>Implement the Air Quality Management Plan and Traffic Management Plan.</p> <p>Enforce traffic speed control measures on unpaved surfaces.</p> <p>Regular inspection and maintenance of construction plant and equipment will be undertaken.</p> <p>Third party monthly monitoring of meteorological conditions (wind speed, wind direction, temperature and precipitation as a minimum), PM10 and ambient dust levels throughout construction phase</p>	<p>To implement Air Quality Management Plan to monitor the emissions to the air and Traffic Management Plan to control dust from the construction roads.</p>	<p>EBRD PR3, IFC PS3, EIB Standard 2 National legislation Best Practice</p>	<p>EPC / EPC JV Contractor Environmental Manager</p>	<p>During construction phase</p>	<p>Records of site inspections.</p> <p>Records of air quality monthly monitoring by a third party expert.</p> <p>Equipment and vehicle maintenance records.</p> <p>Training records for staff.</p>	<p>AT</p>	<p>Air Quality Management Plan and Traffic Management Plan are implemented.</p> <p>The traffic speed control measures are applied in the construction site, such as 20 km/h for on unpaved roads and surfaces and speed bumps.</p> <p>Regular inspection and maintenance of construction plant, vehicles and equipment are in place.</p> <p>Accredited third party accredited by TURKAK makes monthly measurements in the construction site.</p> <p>The settled dust measurements are carried out at receptor locations around the Project site. The results of the settled dust measurements are in accordance with Industrial Sourced Air Pollution Control Regulation, provided with corresponding limit 390 mg/m²-day.</p> <p>24 hours of suspended particulate matter (PM10) measurements are carried out at two set locations around the Project Site PM10 measurement results are compatible with both the aforementioned national regulation which 24 hours PM10 limit value is 60 µg/m³ and EU and IFC limit value 50 µg/m³</p>
PR4	Health and Safety							

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4.1	<p>Community Health and Safety</p> <p>Implement all community health and safety measures for the construction phase including:</p> <ul style="list-style-type: none"> • Emergency Preparedness and Response Plan (EPRP). • Construction Management Plan. • Traffic Management Plan. • Stakeholder Engagement Plan. • Stakeholder Grievance Mechanism. • Security Management Plan <p>Disclose EPRP to local residents and TOBB High School in accordance with Lender requirements.</p> <p>Undertake regular drills/exercises of emergency measures and update local authorities and local residents if there are any changes to emergency procedures.</p> <p>Ensure workers are adequately trained to respond to emergency and EHS issues.</p> <p>Maintain roads in the case of any physical damage because of construction activities and implement road safety measures in accordance with the Traffic Management Plan.</p> <p>Maintain adequate security along the perimeter fence adjacent to TOBB High School.</p> <p>Document discussions of any identified impacts, risks and mitigations with local residents during at least annually.</p>	The project-affected community shall be aware of the adverse effects of the construction activities and protected.	EBRD PR4, IFC PS4, EIB Standard 9	EPC / EPC JV Contractor Construction Site Manager Gaziantep IHC SPV	During construction phase Ongoing Prior to construction phase Ongoing Ongoing Ongoing	<p>Audits of Plan implementation by LTA or other external auditors.</p> <p>Written records and photographic evidence of EPRP disclosure to local residents and TOBB high school.</p> <p>Records of drill exercises including activity and date.</p> <p>Records of training undertaken by staff and attendance</p>	OT	<p>The documentation related to the Community Health, Safety and Security are in place.</p> <p>Emergency Response Plan, Project Quality Management Plan (as Construction Management Plan). And Traffic Management Plan are implemented.</p> <p>Measures related to Stakeholder Engagement System and Public Grievances are in place.</p> <p>Project Protection And Security Plan and Crisis Plan are implemented for the security issues.</p> <p>The latest version, Rev.05 dated 28.05.2018, of the Emergency Response Plan, was recently shared to two High School Managers and Ibni Sina District Officer (Headman / Muhtar) in their visits respectively on 15.11.2018 and 19.11.2018. Discussions with the authorities are based on the Project risks.</p> <p>The workers are trained on the HSE issues and emergency cases and their responses. The workers are tested for emergency cases with respect to the drill and exercise program.</p> <p>The boundary of the Project site is fenced and supported with security cabinets. The High School boundary additionally covered with noise barrier which prevents also the physical movements from the High Schools.</p>
4.2	<p>Security Management</p> <p>Implement Security Policy and Plan.</p> <p>Security personnel will be vetted for past criminal offences, use of force and human rights violations.</p> <p>Ensure security contract firm recruits adequate, trained security staff who have not been involved in past security abuses.</p>	To implement the security management plan, with the objective of providing safeguarding to the personnel and property in reference to the best practice, with the security personnel trained on use of force and appropriate conduct to the workers and the local community.	EBRD PR4, IFC PS4, EIB Standard 9 National legislation	EPC / EPC JV Contractor Construction Site Manager Gaziantep IHC SPV	During construction phase	<p>Audit and inspection reports.</p> <p>Security personnel credentials records with written evidence of the security personnel vetting process to be provided.</p> <p>Training records for security personnel.</p>	AT	<p>Project Protection And Security Plan and Crisis Plan are in place for the security issues.</p> <p>Security personnel are vetted for past criminal offences, use of force and human rights violations.</p> <p>The security subcontractor is a professional company in the security field.</p> <p>The security staff are, legally, trained and certified by independent certifications providers and have no past security abuses.</p>
PR8	Cultural Heritage							

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8.1	<p>Chance Finds</p> <p>Implement Archaeological Chance Finds Management Procedure.</p> <p>Contact relevant authorities (i.e. Museum Directorate) in the case of any chance finds.</p>	To implement the procedure to monitor the presence of any archaeological chance finds in the construction area.	EBRD PR8, IFC PS8 EIB Standard 5	EPC / EPC JV Contractor Construction Site Manager	During construction phase	<p>Records of chance finds.</p> <p>Copies or correspondence with Museum Directorate.</p>	ET	<p>The Archaeological Chance Finds Procedure are in place.</p> <p>Contact number of Gaziantep Museum Management is in the Procedure.</p> <p>There is no finding up to now in the Project.</p>
PR10	Information Disclosure and Stakeholder Engagement							
10.1	<p>Stakeholder Engagement Plan</p> <p>The SEP to be updated if there are significant changes to the Project and once the Project changes from construction to operation phase.</p> <p>All consultation shall be documented, including safety awareness campaigns and meetings with TOBB High School.</p> <p>Implement safety awareness programme with local residents and TOBB High School on the dangers of trespass and road safety.</p> <p>Annual reporting to Lenders on the implementation of the ESMMP and any new impacts or risks identified to affected local residents or other stakeholders.</p>	To update the Stakeholder Engagement Plan to communicate the potential hazards, risks and impacts of the Project to the High School and local residents to increase the safety awareness.	EBRD PR1, PR10, IFC PS1 EIB Standard 10	Gaziantep IHC SPV	During construction phase	<p>Review of SEP.</p> <p>Records of consultations and meetings and safety campaigns.</p> <p>Records to include photographic evidence and attendance lists, which will be provided for consultations.</p>	OT	<p>Stakeholder Engagement Plan is in place.</p> <p>The Stakeholder Engagement Plan will be updated accordingly when the Project passes from the construction to the operation phase.</p> <p>The environmental and safety risks are in discussion with Ibni Sina District Officer (Headman / Muhtar) and the managers of the High Schools.</p>
10.2	<p>Grievance Mechanism</p> <p>Implement the grievance mechanism.</p> <p>Respond to grievances in a timely manner in accordance with mechanism.</p> <p>Undertake necessary corrective actions.</p>	To implement the grievance system at which any stakeholder including the public can communicate their concerns disturbances related to the Project through the communication tools disclosed and to record, to investigate and to respond the grievance owner with the resolution.	EBRD PR1, PR10, IFC PS1 EIB Standard 10	EPC / EPC JV Contractor Oversight by Gaziantep IHC E&S Manager	During construction phase	Grievance log.	ET	<p>The Project Grievance Plan is implemented. The plan was finally revised on 31.05.2018 reflecting the requirements of EBRD PR2, IFC PS2 and EIB Standard 8 and 10.</p> <p>All the grievances raised by either Project staff and workers and public are recorded, investigated thoroughly. The responses are passed to the grievance owner.</p> <p>The necessary measures are taken according to stage and day schedule in the plan.</p>