Report

Nakkas Otoyol Yatırım ve İşletme A.Ş.
Istanbul, Türkiye

Nakkaş – Başakşehir Motorway Project Gender Action Plan (GAP)

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ABBREVIATIONS AND ACRONYMS

AoI	Area of Influence
BEEPS	Business Environment and Enterprise Performance Survey
BOT	Build, Operate and Transfer
CDC	Commonwealth Development Corporation, UK
CEDAW	Convention on the Elimination of all Forms of Discrimination Against Women
CLO	Community Liaison Officer
CLS	Core Labour Standards
CoC	Code of Conduct
EBRD	European Bank for Reconstruction and Development
ECA	Europe and Central Asia
ECtHR	European Convention for the Protection of Human Rights and Fundamental Freedoms
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plans
EPC	Engineering, Procurement and Construction
GAP	Gender Action Plan
GBV	Gender Based Violence
GBVH	Gender Based Violence and Harassment
GDI	Gender Development
GGI	Gender Gap Index
GII	Gender Inequality Index
HDI	Human Development Index
HDR	Human Development Report
HIV	Human Immunodeficiency virus
IFC	International Finance Corporation
ILO	International Labour Organisation
İŞKUR	Başakşehir, Arnavutköy and Büyükçekmece State Labour Agency
IVKAD	Association of Construction and Women
KAGIDER	Women Entrepreneurs Association of Turkey
KSGM	The General Directorate of Women's Status
LGBTQI	Lesbian, Gay, Bisexual, transgender, Queer and Intersex
LRP	Livelihood Restoration Plan
NMM	Northern Marmara Motorway
NTS	Non-Technical Summary
OECD	Organisation for Economic Co-operation and Development
OHS	Occupational Health and Safety
O&M	Operation and Maintenance
PAP	Project Affected Person
PPE	Personal Protective Equipment
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SME	Small Medium Sized Enterprises
STD	Sexually Transmitted Diseases
STEM	Science, Technology, Engineering, Math
TDHS	Turkish Demographic and Health Survey
TDVS	Turkey Domestic Violence Survey

TEM	Trans European Motorway
TGNA	Turkish Grand National Assembly
TVPA	Trafficking Victims Protection Act
TL	Turkish Lira
UN	United Nations
UNDP	United Nations Development Program
UNESCO	United Nations Education, Science and Cultural Organization
WEF	World Economic Forum

1 INTRODUCTION

Gender Action Plan (GAP) of the Nakkaş Başakşehir Motorway Project (the Project) has been prepared in 2023 by ERM. However, change in timeline of the Project implementation caused the change of status of the topics thus RINA, as an independent GBVH Consultant of the Project, updated the GAP by reassessment in accordance with observations on-site, and implementation practices and provided information by the Nakkaş Otoyol Yatırım ve İşletme A.Ş. ("the Company").

In line with this mandate, RINA is not re-drafting or restructuring the original document instead, RINA provides updated status of the actions and **guidance and recommendations** on:

- ✓ how specific action items can be implemented in practice,
- ✓ which evidence documents may be used to demonstrate compliance, and
- ✓ how the Company can monitor and close out the action items presented at this plan.

Accordingly, the responsibility for implementation, monitoring, and submission of the updated Gender Action Plan to the Lenders remains with **Nakkaş Otoyol Yatırım ve İşletme A.Ş.** RINA's role is strictly advisory, ensuring that the Company is equipped with the necessary instructions to align the Gender Action Plan with the requirements of international best practice and Lender standards.

1.1 OVERVIEW

Istanbul has historically been an intersection of international and national trade routes. Due to its socio-economic attractiveness, Istanbul has also faced an intensive internal migration from across the country and its population has increased to nearly 15 million (nearly 18% of the total population in Türkiye[1]). Growing population and intense logistic activities driven from economic growth create enormous traffic pressure and challenges in Istanbul and the Marmara region.

For this reason, several motorways were constructed in the Marmara Region with the aim to decrease the traffic load, including the "Northern Marmara Motorway" (NMM). The NMM was originally comprised of seven sections in total connecting Asia and Europe with an uninterrupted traffic flow and is considered an alternative route to the European Road 80 (E 80 also known as Trans European Motorway (TEM). The first seven sections of the NMM have already been completed and are under operation (See Figure 1-1).

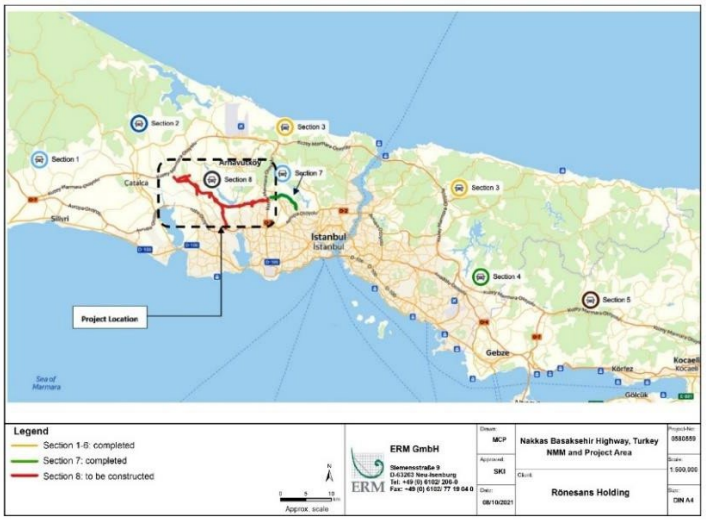


Figure 1-1: Sections of Northern Marmara Motorway

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[1] Source: Turkish Statistical Institute (TUIK) - https://data.tuik.gov.tr/Bulten/Index?p=Adrese-Dayali-Nufus-Kayit-Sistemi-Sonuclari-2020-37210

Based on the tender process held on 30 June 2020 and the agreement following on 13 April 2021, the 1st Regional Directorate of General Directorate of Highways (KGM) involved an additional section within the scope of NMM which is called "Section 8 - Nakkas-Basaksehir Motorway" (hereafter called the Project).

The Project is a new 4-lane dual toll road with a total length of 30,64 km including connection road and 1619 m long Sazlıdere Cable Stayed Bridge. Nakkaş Otoyol Yatırım ve İşletme A.Ş. (the Company) - a Special Purpose Vehicle (SPV) under a Build, Operate and Transfer (BOT) contract signed with Turkish Ministry of Transport, General Directorate for Highways (KGM) in 2020 - is responsible for the construction and operation of the Project.

The construction of is the Project is planned be completed by the first quarter of 2027.

The Company finances the investment costs of the Project by debt and equity under a Project Finance structure involving but not limited to European Bank for Reconstruction and Development (EBRD), Asian Infrastructure Investment Bank (AIIB) and Atradius.

1.2 PURPOSE

This Gender Action Plan (GAP) has been prepared based on the Lenders requirements which forms the basis for operationalizing the results and recommendations of the gender analysis. It contains specific gender elements to be considered during Project implementation. Moreover, it helps to monitor implementation of these measures and activities. Hence, the GAP ensures effective gender mainstreaming and integration of a consistent gender-perspective in the Project in order to maximize gender equality and development co-benefits.

The aim is to promote opportunities, drivers of change and positive gender dynamics as well as to manage and mitigate potential adverse risks over the duration of the Project. The GAP aims that the program is compliant with EBRD gender policy and strategy for promotion of gender equality[2] and with E&S Framework of AIIB[3].

The GAP draws on good practices for gender mainstreaming in infrastructure projects and resources developed by ADB[4] and EBRD[5] providing guidance on how gender mainstreaming can be put into practice and integrated into Project implementation.

EBRD gender toolkits[6] will be utilized to facilitate the promotion of gender equality, sharing of lessons and experiences learned.

The GAP is closely aligned with the ESIA documentation, including the Stakeholder Engagement Plan (SEP) and the Resettlement Action Plan (RAP). It complements the Environmental and Social Management and Monitoring Plan (ESMMP) which includes mitigation measures for Project impacts and already contains gender-related aspects. The Company has policies and procedures in place promoting the gender-based approach which are expected to be reflected in the policy framework and the ESMMS to be established for the Project implementation.

This document contains three main parts, besides the initial introduction:

- ✓ The first part presents an overall gender assessment (Chapter 2), outlining the policy framework and institutional setup related to gender equality in Türkiye. The gender assessment section also presents the status on gender inequality indicators, and opportunities in the construction and transport sectors.
- ✓ The second part (Chapter 3) presents Project gender impacts and opportunities drawing from the ESIA documentation, and
- ✓ The third part (Chapter 4) presents the Gender Action Plan outlining actions to be taken throughout the Project implementation to mitigate adverse gender impacts and enhance women's opportunities and economic empowerment.

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[2] EBRD, 2021. Strategy for the Promotion of Gender Equality 2021-2025

[3] AIIB E&S Framework 2021

[4] ADB, 2013. Preparing a Project Gender Action Plan

[5] EBRD, 2011. Gender 1 – Urban rehabilitation and transport projects

[6] EBRD, 2022 Gender and Mitigation Tool ; Tips to Identify Gender Entry Points ; Gender Mainstreaming in District Heating Projects in the Commonwealth of Independent States ; Gender Responsive Investment Climate Reform Toolkit — Tajikistan

1.3 PARTICIPATORY APPROACH

The Gender Action Plan relies on the data gathered during the elaboration of ESIA, baseline studies and interviews. Further consultations took place with Nakkaş Otoyol A.Ş external experts' inputs were integrated.

The Gender Action Plan will be implemented and monitored using participatory methods on multiple levels. Relevant external stakeholders, including community leaders, women activists, external independent experts, private and public organizations and institutions, will be continuously identified over the implementation period of this GAP. These stakeholders will be invited and continuously encouraged to participate in the implementation of the GAP and/or specific actions within the GAP framework. These external stakeholders will be also interviewed continuously for the purpose of monitoring report.

Participatory methods will be also used in order to access the implementation of internal policies, standards, and processes. Management and workers will be interviewed anonymously in order to provide their feedback on specific actions within the GAP framework. At the same, the interviews provide an opportunity for women to identified specific needs which may arise during the implementation of the Project.

2 LEGAL FRAMEWORK AND INSTITUTIONAL STRUCTURE

2.1 TURKIYE'S GENDER POLICY FRAMEWORK AND DEVELOPMENT INDICATORS

In 1934, Turkish women were among the first in Europe to achieve the right to vote and run for elected office. Women are given equal rights under the Constitution, and women's rights to access, own and control land, adequate property are recognized under the Turkish Civil Code. However, inequalities in education, employment, health, and access to land for women remain prevalent across the country.

The following sections outline the institutional and policy framework guiding gender equality in Türkiye. At the core of the gender equality initiatives are the ratification of the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW), as well as human rights and ILO conventions. Key national laws, policies and strategies are also outlined as well as the institutional setup for gender equality in Türkiye.

2.1.1 Institutional and Policy Framework

Türkiye ratified the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) in 1986 and lifted the reservations on Articles 15 and 16 in 1999. The Beijing Declaration and Optional Protocol to CEDAW were signed in 1995 and 2002, respectively.

The first institutional framework for gender equality in Türkiye was the 'Advisory Board for Policies with regards to Women' established in 1987 within the State Planning Organization to raise gender awareness in public policies. The General Directorate of Women's Status (Kadının Statüsü Genel Müdürlüğü, KSGM) was established in 1990 to achieve the objectives of CEDAW. Other international commitments include the United Nations Charter, the Human Rights Declaration (1948), and the Convention on the Elimination of All Forms of Gender Discrimination.

A range of policies and strategies have been put in place to establish mechanisms, programmes, and plans for gender mainstreaming. The KSGM prepared the National Action Plan for Societal Gender Equality for 2009-2013, which focused on the elimination of gender-based inequality in education, health, poverty and access to the decision-making process. Türkiye's 11th National Development Plan 2019-2023 contains goals and measures to empower women, prevent discrimination against them, and ensure that women have equal access to the rights, opportunities, and facilities available to men. Other policy documents adopted include the National Strategy and Action Plan on Women's Empowerment (2018-2023), the National Action Plan on Combating Violence and Women (2016-2020) and the National Action Plan on Women's Employment (2016-2018).

In 2012, Türkiye was the first of 35 Member States of the Council of Europe to ratify the Istanbul Convention. The Istanbul Convention is a ground-breaking treaty of the Council of Europe specifically designed to tackle systematic and widespread violence against women and girls. It sets out comprehensive standards for prevention of violence against women, protection and support for survivors, and prosecution of perpetrators, as well as establishing obligations for State parties to provide minimum essential support services to victims, such as shelters and medical assistance. Nevertheless, in March 2021, Türkiye announced its decision to withdraw from the Istanbul Convention by Presidential decree. At the same day as the withdrawal, the 4th National Plan for Combating Violence Against Women (2021-2025) was announced. However, the plan makes no reference to the concept of gender equality, nor does it refer to the Istanbul Convention recognized as the most comprehensive roadmap for combating violence.

2.1.2 Legal Framework

Human rights in Türkiye are protected by multiple international laws and treaties, which, according to Article 90 of the Constitution of 1982, shall prevail over domestic legislation. Some human rights commitments entered by Türkiye are expressed in Part Two of the 1982 Constitution, which guarantees fundamental rights and freedoms (right to life, security of person, right of property, etc.). Furthermore, the observance and improvement of human rights is one of the responsibilities of the Human Rights and Equality Institution of Türkiye and the Ombudsman Institution since 2012.

Türkiye is party to sixteen UN human right conventions, including the Universal Declaration on Human Rights (UDHR). The core international human rights commitments signed are presented in Table 2.1 Türkiye is party to 121 of 225 conventions of the Council of Europe, including the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECtHR), as well as recognizing the jurisdiction of the European Court of Human Rights.

In regard to human trafficking, Türkiye was listed as a Tier 2 country in 2020, meaning it could not fully comply with all of the Trafficking Victims Protection Act (TVPA)'s minimum standards. Victims of human trafficking in Türkiye are mainly from Central and South Asia, Eastern Europe, Azerbaijan, Indonesia, Morocco, and Syria7. Syrian refugees, including children, are especially vulnerable to human trafficking. The government created the Prevention of Human Trafficking Act of 2014 to establish cooperation between the public and private sector to fight human trafficking.7

Türkiye has ratified all fundamental ILO conventions. These include conventions No. 29 and 105 on the elimination of forced labour, conventions No. 138 and 182 on elimination of child labour, No.111 on the discrimination convention and 100 on the equal remuneration convention, as well as the conventions No. 87 and 98 on freedom of association and the right to organise.[8]

Table 2.1: Human Rights and ILO Conventions ratified by Türkiye

Convention	Purpose	Status
Human Rights Covenants and Conventions		
European Convention for the Protection of Human Rights and Fundamental Freedoms, 1950 (18 May 1954)	The Convention is designed to protect human rights and fundamental freedoms in Europe. / The Project will need to employ people and recognize these principles.	Ratified
International Covenant on Economic, Social and Cultural Rights (ICESC), 1966 (23 Sep 2003)	The Convention promotes equal rights of men and women to enjoy all economic, social and cultural rights. / The Project will need to employ people and recognize these principles.	Ratified
International Covenant on Civil and Political Rights (ICCPR), (23 Sep 2003)	The Covenant commits its parties to respect the civil and political rights of individuals, including the right to life, freedom of religion, freedom of speech, freedom of assembly, electoral rights and rights to due process and a fair trial. / The Project will need to employ people and recognize these principles.	Ratified
UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 1979 (20 Dec 1985)	The Convention sets out agenda to end discrimination against women. / The Project will need to employ people and recognize principles of equality of men and women.	Accession

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[7] US State Department. 2020. Trafficking in Persons Report, 20th Edition. Available from: https://www.state.gov/wp-content/uploads/2020/06/2020-TIP-Report-Complete-062420-FINAL.pdf

[8] ILO, 2020. Ratifications of Conventions, Turkey

Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery (17 Jul 1964)	The Convention bans debt bondage, serfdom, early and servile marriage and child servitude. / The Project will need to employ people and recognize these principles.	Ratified
International Convention on the Elimination of All Forms of Racial Discrimination, 1966 (16 Sep 2002)	The Convention undertakes to eliminate racial discrimination in all its forms and promote understanding. / The Project will need to employ people and recognize these principles.	Ratified
UN Convention on the Rights of Persons with Disabilities, 2006 (28 Sep 2009)	The Convention promotes non-discrimination and equality of opportunity. / The Project will need to employ people and recognize these principles.	Ratified
United Nations (UN) Convention on the Rights of the Child, Article 32.1	The aim of the Convention is to set standards for the defence of children against the neglect and abuse they face to varying degrees in all countries every day and it allows for different cultural, political, and material realities among states with the most important consideration being the best interest of the child. / The project will adhere to these standards in regard to local project affected communities.	Ratified
UN Convention on the Protection of the Rights of all Migrant Workers and Members of their Families, 1990	Aims at guaranteeing equality of treatment, and the same working conditions for migrants and nationals. / The Project will need to employ people and recognize these principles.	Ratified
International Labour Organisation Conventions		
ILO Convention (No.29) on Forced Labour (30 Oct 1998)	The Convention adopts proposals to eliminate forced or compulsory labour. / The Project will need to employ people and recognize these principles.	In force
ILO Convention (No. 87) on Freedom of Association and Protection of the Right to Organize (12 Jul 1993)	The Convention adopts freedom of association and protection of the right to organize.	In force
ILO Convention (No.98) on the Right to Organize and Collective Bargaining (23 Jan 1952)	The Convention adopts right to organize and collective bargaining.	In force
ILO Convention (No.100) on Equal Remuneration (19 Jul 1967)	The Convention adopts proposals on the principle of equal remuneration for men and women for work of equal value. / The Project will need to employ people and recognize these principles.	In force
ILO Convention (No.105) on the Abolition of Forced Labour (29 Mar 1961)	The Convention stipulates that all parties shall eliminate and will not make use of any form of compulsory or forced labour. / The Project will need to employ people and recognize these principles.	In force
ILO Convention (No.111) on Discrimination (Employment and Occupation) (19 Jul 1967)	The Convention promotes equality of opportunity and treatment in employment and occupation. / The Project will need to employ people and recognize these principles.	In force

ILO Convention (No.138) on Minimum Age (of Employment) (30 Oct 1998)	The Convention pursues the abolition of child labour and increases the minimum age for admission to employment. / The Project will need to employ people and recognize these principles.	In force
ILO Convention (No. 182) on the Worst Forms of Child Labour (02 Aug 2001)	The Convention obliges parties to take effective measures to prohibit and eliminate the worst forms of child labour. / The Project will need to employ people and recognize these principles.	In force

The national regulatory framework includes several laws protecting women's rights. Türkiye has laws in place that prohibit discrimination in employment by gender (Labour Act, Art. 5, Law on Human Rights and Equality, Arts. 3 and 6), and the penal code addresses sexual harassment in employment (Penal Code, Art. 105(2); Labour Act, Art. 24(II)(a)), just as there are criminal penalties or civil remedies for sexual harassment in employment (Criminal: Penal Code, Art. 105(2), and Civil: Penal Code, Art. 50(1)(b))[9]. A summary of national laws related to protection of women's rights is given in the table below which shall be considered by the Company and EPC Contractor during development of HR policies, GBVH policies as recommended.

Table 2.2: National Laws Protecting Women's Rights

Regulation	Summary	Action
Gender-Based Violence and Harassment (GBVH)		
Law to Protect Family and Prevent Violence against Woman No. 6284 Official Gazette Date/Number: 20.03.2012/28239 Last Amended on 19.08.2017	The purpose of this law is to protect the women, the children, the family members, and the victims of stalking, who have been subject to the violence or at the risk of violence, and to regulate procedures and principles about the measures of preventing the violence against those people.	Consider this law in the development of the HR Policy and specifically, the GBVH policy
Turkish Criminal Code No. 5237 Official Gazette Date/Number: 12.10.2004/25611 Last Amended on 14.07.2021	The purpose of the Criminal Code is to protect the individual rights and freedom, public order and security, state of justice, public health and environment, and communal peace, as well as to discourage commitment of offences. This Law defines the basic principles for criminal responsibility and types of crimes, punishments, and security precautions to be taken in this respect. The sixth section of the Criminal Code is on offenses against sexual immunity including article 102 on sexual abuse and article 105 on sexual harassment.	Consider this law in the development of the HR Policy and specifically the GBVH policy
Equal Opportunity		
Law on Equal Opportunities Commission for Woman and Man No. 5840 Official Gazette Date/Number: 24.03.2009/27179 Last Amended on 02.07.2018	The purpose of the Law is to follow the developments on national and international scale related to the protection and improvement of women rights and provision of equal opportunities for women and men, and to set provisions for the establishment, duties and working principles of the Equal Opportunities Commission for Woman and Man.	Consider the studies/reports of Equal Opportunities Commission for Woman and Man in the development of policy/procedure on equal opportunity

Social Support		
Law on Social Assistance and Encouragement of Solidarity No. 3294 Official Gazette Date/Number: 14.06.1986/19134 Last Amended on 02.07.2018	The purpose of this Law is to help citizens who are poor and in need and to those people who have been accepted to or come to Türkiye for whatever reason; to ensure fair income distribution by taking measures to reinforce social justice, and to encourage social assistance and solidarity.	Consider this law in the development of social support projects as part of the Project
Law on Social Services No. 2828 Official Gazette Date/Number: 27.05.1983/18059 Last Amended on 16.04.2020	The purpose of this law is to regulate the principles and procedures regarding the establishment, duties, authorities and responsibilities, activities and incomes of the organization established to carry out social services for families, children, disabled, elderly, and other persons who need protection, care or assistance.	Consider this law in the development of social support projects as part of the Project
Law on Regular Cash Support for Turkish Citizens Who are 65 Years of Age or Older and Poor and Alone No. 2022 Official Gazette Date/Number: 10.07.1976/15642 Last Amended on 11.05.2018	Turkish citizens over the age of 65, who are determined to be in need by Social Assistance and Solidarity Foundations, are granted a pension in the amount to be found by multiplying the indicator number (4.387) with the civil servant salary coefficient, as long as the state of need continues. Those citizens who receive an income from any of the social security institutions, who work in a job that requires having a compulsory insurance, who receive or is eligible to receive an alimony, and who receive allowance as per Social Services Law are excluded from getting a pension.	Consider this law in the development of social support projects as part of the Project

2.2 RÖNESANS HOLDING POLICIES AND INITIATIVES

Rönesans Holding has adopted several policies and principles related to protecting women's rights as outlined in Table 2.3.

Table 2.3: Rönesans Holding Policies and Principles Related to Protecting Women's Rights

Holding company plan/procedure	Gender related article	Related gender item
HOL-IKY-PRO-006 Personnel Selection and Placement Procedure HOL-IKY-PRO-007 Internship Activities Procedure HOL-IKY-PRO-008	3. EQUAL TREATMENT AND ABUSE PRINCIPLE The principle of equal treatment, which is Article 5 of the Labor Law No. 4857, of the personnel within Rönesans Holding and its group companies, agreements with the International Finance Corporation (IFC), International Labor Organization (ILO) and the relevant project/enterprise All processes are carried out within the framework of other international requirements (EBRD, etc.) to which it is subject. Rönesans Holding treats its employees equally by offering equal rights and opportunities. According to these rules	No discrimination can be made among the personnel in internship activities and training programs for any reason. Internship and training programs are given equal opportunities regardless of gender, language,

Compass Young Discovery Program Procedure HOL-IKY-SPC-001 General Rules of Employment HOL-YYG-PRO-002 Training Procedure HOL-YYG-PRO-003 Career Management Procedure	employees working in Rönesans Holding and group companies and candidates involved in the employment process are offered equal opportunities in all human resources processes, regardless of gender, language, religion, race and ethnicity, and the processes are carried out within the framework of equality of opportunity. Apart from this, no business relations can be established with persons under the age of 18, forced or forced labor or child labour cannot be employed in Rönesans Holding and Group companies. No one can be forced to work, or an application can be made to meet the debts with labour power. Rönesans acts in compliance with all local, national, and international regulations and legislation on child labour.	religion, race, and ethnicity.
HOL-IKY-PRO-006 Personnel Selection and Placement Procedure	7. DEFINITIONS AND ABBREVIATIONS Discrimination: Differences in policy and action due to gender, language, religion, race and ethnic origin and the unequal treatment of individuals.	There will be no gender discrimination in personnel employment.
HOL-IKY-PRO-006 Personnel Selection and Placement Procedure	7.7. Evaluation of Candidates The relevant Recruitment Officer prepares the job interview program in accordance with the schedule of the authorized person who will conduct the interview and invites the candidates who apply for the position to be interviewed according to this program without any prejudice or discrimination.	In the evaluation process of the candidates, only the suitability of the candidates for the nature of the job is evaluated. No discrimination can be made between candidates for any reason.
HOL-IKY-SPC-001 General Rules of Employment	7.8. Principle of Equal Treatment / Anti-Discrimination and Equal Opportunity Equal opportunities are offered to all personnel working within Rönesans Holding and its group companies and all candidates involved in the employment process, regardless of gender, language, religion, race, and ethnic origin, in all human resources processes, and all processes are carried out within the framework of equal opportunity.	The personnel will not be exposed to any discrimination during their employment. No discrimination based on religion, language, race, ethnic origin or gender can be made in matters such as working hours, personnel salaries, and raise rates.
HOL-IKY-LST-002 List of Ad Posting Criteria	Rönesans Holding is one of the signatories of the UN Global Compact, which calls on companies to align their strategies and operations with the principles of universal human rights, labour, environment, and anti-corruption, and to take measures to advance social goals. Rönesans Holding is an employer that aims to ensure equality in human resources practices by observing transparent and ethical values without compromising its main principles of honesty, competitiveness, and innovation. All applications are evaluated based on equal opportunity, regardless of gender, language, religion, race and ethnic origin, and there is no discrimination.”	There will be no gender discrimination in advertisement publications. Every personnel can apply for the subject advertisement without any discrimination in accordance with the qualifications of the job whose advertisement is published, and they

		are evaluated equally.
REC-İSG-KMO-PL-22 Security Management Plan	Chapter 5 of the Security Management Plan identifies Key security risks of the project. One of the Key Security Risks identified is GBVH 6.8 Gender Considerations The maintenance of a workplace that is free of harassment, including GBVH prevention is a company priority.	Implementation of control measures to ensure the prevention of GBVH, such as awareness raising campaigns, hire of female security guards, specific trainings on how to manage GBVH for each employee, etc.)
REC-İSG-ÇYS-KMO-PL-13 Community Health, Safety and Security	Increased Risk of GBVH One of the impacts identified in relation to community health and safety for the construction phase is an increased risk in GBVH.	Prevention measures including the delivery of training and orientation respecting local communities and vulnerable populations, with a special focus on gender, Human Rights and GBVH risks awareness.
REC-İSG-ÇYS-KMO-PL-16 Camp Management Plan	6.13 Non-discrimination and equal opportunity. The accommodation services will be provided in a manner consistent with the principles of non-discrimination and equal opportunity. As such, workers' gender, religious, cultural and social backgrounds will be respected.	There will be gender-based accommodation facilities and gender-segregated toilet and washing facilities at construction camps and all sites where women work. Body searches are performed only in exceptional circumstances by trained personnel of both genders.
REC-İK-KMO-PL-01 Labour management Plan	Labour Risks and Impacts Related to Women Employment and Non-Discrimination and Equal Opportunity REC is an employer that aims to ensure equality in human resources practices by observing transparent and ethical values without compromising its main principles of honesty, competitiveness and innovation. In Project, all applications are evaluated according to equal opportunity regardless of gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation	Application of equal opportunities to women in all branches. A gender quota will be used to ensure women are in the pool of candidates. A Gender Strategy will be implemented for the Project, including mitigation measures in relation to GBVH. There will be a GM in place and gender-based

		complaints and necessary measures will be taken accordingly. Discrimination behaviour or practice arising from any reason such as gender or sexual orientation will be recorded and examined. All staff will be trained to prevent GBVH and promote gender-sensitivity work environment.
REC-İSG-ÇYS-KMO-PR-11 Contractor Management Plan	Gender-Based Violence, Harassment and Inequalities GBVH and Inequalities are recognized by REC for subcontractor activities. The Contractor Management Plan contains several provisions to counter and mitigate GBVH and Inequalities. Increase risk of GBVH REC recognizes the increased risk of GBVH during the project activities. In order to mitigate these risks a gender strategy will be implemented, including mitigation measures.	Specific provisions will be implemented in the Project's GM to manage grievances related to GBVH (e.g. the complainant will be able to communicate the grievance to a person of its preferred gender); Training and orientation will be delivered on respecting local communities and vulnerable populations, with a special focus on gender, Human Rights and GBVH risks awareness; Monitoring systems will be put in place for regular reporting on GBVH.
HOL-IKY-PRO-006 Personnel Selection and Placement Procedure	7. DEFINITIONS AND ABBREVIATIONS Discrimination: Differences in policy and action due to gender, language, religion, race and ethnic origin and the unequal treatment of individuals.	There will be no gender discrimination in personnel employment.

In addition to the policies and principles in place, Rönesans Holding has taken several initiatives to ensure equality at the workplace and promote gender equality. Table 2.4 provides an overview of initiatives taken between 2016 and now, that can form the basis for additional initiatives outlined in the Gender Action Plan in section 4.

Table 2.4: Gender Initiatives Taken by Rönesans Holding

Date	Gender Initiatives	Content
March 2016	Rönesans Holding signed the UN Women's Empowerment Principles	Rönesans Holding is committed to ensuring equality through social initiatives and supports, including providing high-level corporate leadership for gender equality, being fair to all women and men, respecting human rights without discrimination, supporting women with education, training, and professional development opportunities, as stipulated by these principles.
August 2016	Rönesans Became the "Compass" of Youth.	Within the scope of the Compass Young Discovery Program organized by the Renaissance Education Foundation, the duties, authorities, and responsibilities regarding the activities to be carried out to provide fixed-term employment opportunities to newly graduated candidates under the roof of Rönesans are determined.
March 2019	"Rönesans Business Services Turned the "Route" in Health to Women's Employment. (Currently called "COMPASS PROGRAM")"	With the "Route Programme" it has implemented, Renaissance Management Services, under the umbrella of Rönesans, contributes to both women's employment and the training of qualified personnel, which is an important need in the health sector.
August 2019	Hand Painting Event for No to Violence Against Women	A hand-painting event was organized by Yozgat City Hospital to raise awareness of "Against Violence Against Women".
October 2019	United Nations Global Compact	As a signatory of the UN Global Compact since September 2015, we have been fulfilling our social and environmental responsibilities. As a signatory of the UN Global Compact, which is entirely voluntary, upon the business world's adoption of a common sustainable development culture, Rönesans adopts 10 basic universal principles. Rönesans builds its organizational structure and management system in all fields of work within the framework of these universal principles covering Human Rights, Labor Standards, Environment and Anti-Corruption and continues to work in accordance with these principles. The Communication on Progress Report, prepared in this context, was published on the UN Global Compact website, emphasizing our commitment to society, people and environment-oriented advancement once again.
March 2020	With the Support of Rönesans Women.	A psychological support program was carried out for women and children who lost their relatives and homes in the earthquake in Elazig. The psychological support program, which will be carried out by adult and child psychologists 2 days a week, will consist of group therapy and one-on-one interviews, and will last for 6 weeks.
	Vocational High School Coaches	Rönesans Volunteer Team, with 20 volunteer coaches, participated in the Vocational High School Coaches Project carried out in cooperation with the Ministry of National Education's Vocational and Technical Education Directorate and the Private Sector Volunteers Association. Rönesans volunteer coaches played a role model for the female students and reached 750 volunteer hours/year by mentoring 90 female students in Küçükyalı Industrial and Technical Vocational High School. This mentoring included both capacity building and improvement of social skills of the female students.
June 2022	Rönesans Holding Sustainability Award	Rönesans Holding received the bronze award in the category of "Gender Equality and Economic Inclusion" at the 2022 Sustainability Awards of the European Bank for Reconstruction and Development (EBRD). The Gender Equality Project, aimed at bringing an egalitarian perspective to HR policies and procedures in the healthcare sector, was deemed worthy of the award due to the gains achieved. As one of the most significant collaborations with EBRD, the project comprehensively strengthened

		Rönesans' HR processes, policies, and procedures, ensuring equal opportunities for women and men in the healthcare sector.
March 2025	Domestic Violence Prevention Policy	Rönesans Holding launched a Domestic Violence Prevention Policy, committing to provide internal and external support to employees exposed to violence. In cooperation with the Federation of Women Associations of Türkiye, a Domestic Violence Emergency Hotline was established, allowing employees to receive confidential support. The company also introduced health-focused measures, including free HPV vaccination under health insurance and annual mammography screening for female employees over 40.
March 2025	Women's Leadership and Civil Society Partnerships	Rönesans Holding aims to strengthen the role of women leaders in decision-making mechanisms. The "Rönesans Effect Workshops for Women," organized within the company, provide a platform for female employees to share their experiences, which are then integrated into corporate strategies by the management.

3 GENDER ANALYSIS

3.1 GENDER INEQUALITIES

3.1.1 Human Development Index and Gender Gap Indicators

The Human Development Index and other indices related to gender inequality and gender gaps provide indicators of the level and extent of gender equality in Türkiye Table 3.1. presents key indicators of gender equality and gender gaps, related to education, employment, and political participation at national level.

Gender equality is increasing in many aspects in Türkiye, ensuring equality of outcome for women[10]. However, the current levels have plenty of room for progress in several areas, particularly in educational attainment, participation in the labour market and overall access to economic opportunities when compared with the situation in countries with similar levels of income per capita. In Türkiye, 87.2 percent of adult women have reached at least secondary level of education compared to 92.5 percent of the male counterparts. Female labour force participation has increased to 34.0 percent in 2020 from 24.5 percent in 2008. However, it represents about half of the female labour force participation in Europe and Central Asia region or the OECD[11].

Table 3.1: Gender Gap Indicators

Gender Gap Indicators	Ratio/value/rank	Female	Male
Human Development Index (HDI) (value/rank)	0.853 / 45	-	-
HDI (female/male)	-	0.829	0.881
Gender Development Index[12]	0.941	-	-
Gender Inequality Index[13] 2020 (value/rank)	0.306/68	-	-
Gender Inequality Index (average annually change 2005/2019)	-3.9	-	-

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[10] Equality in outcome refers to achievement of equality in a broader, more results-oriented, redistributive sense, based on the insight that equality of opportunity and equal treatment may not be enough to redress the historic repression and disadvantage of women. See EIGE definitions and notes.

[11] World Bank,Turkey Gender Country Assessment 2018.

[12] Ratio of female to make HDI values. See technical note on how the Gender Development Index (GDI) is calculated (UNDP).

[13] A composite measure reflecting inequality in achievement between women and men in three dimensions: reproductive health, empowerment, and labour market. See technical notes on how the Gender Inequality Index (GII) is calculated (UNDP).

Global Gender Gap Index[14] 2021 (score/rank/change)	0.638/127/-2	-	-
Share of seats in parliament (% held by women)	19.9	-	-
Share of seats in local government (% held by women)	10.1	-	-
Expected years of schooling, female/male (years)[15]	-	16.0	17.1
Mean years of schooling, female/male (years)[16]	-	7.3	9.0
Population with at least some secondary education (% ages 25 and older)	0.69 (ratio)	87.2	92.5
Share of graduates from STEM in tertiary education who are female (%) – share of female students among all students	14.2	-	-
Share of graduates from STEM programs at tertiary level, female (%) — share of female tertiary graduates in STEM among all female tertiary graduates	34.7	-	-
Estimated gross national income per capita (PPP $)		17,854	37,807
Labour force participation (% ages 15 and older)[17]		34.0	72.6
Total unemployment rate (female to male ratio)[18]	1.36		
Youth unemployment rate (female to male ratio)[19]	1.31		
Time spent on unpaid domestic chores and care work (female to male ratio)	5.2		
Women's share of employment in senior and middle management (%)	17.5		
Mandatory paid maternity leave (days)	112		
Contraceptive prevalence, any method (% of married or in-union women of reproductive age (15-49 years)	69.8		

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[14] The Global Gender Gap Index (GGGI) benchmarks the evolution of gender-based gaps among four key dimensions (economic participation and opportunity, educational attainment, health and survival, and political empowerment) and tracks progress towards closing these gaps over time. The GGGI is prepared by the World Economic Forum.

[15] Number of years of schooling that a child of school entrance age can expect to receive if prevailing patterns of age-specific enrolment rates persist throughout the child's life.

[16] Average number of years of education received by people ages 25 and older, converted from educational attainment in levels using official duration of each level.

[17] Proportion of the working-age population (ages 15 and older) that engages in the labour market, either by working or actively looking for work, is expressed as a percentage of the working-age population.

[18] Ratio of the percentage of the female labour force population ages 15 and older that is not paid employment or self -employed but is available for work and is actively seeking paid employment or self-employment to the percentage of male labour force population ages 15 and older that is not paid employment or self-employed but is available for work and is actively seeking paid employment or self-employment.

[19] Ratio of the percentage of the female labour force population ages 15-24 that is not in paid employment or self-employed but is available for work and is actively seeking paid employment or self-employment to the percentage of male labour force population ages 15-24 that is not paid employment or self-employed but is available for work and is actively seeking paid employment or self-employment.

Unmet need for family planning (% of married women of reproductive age, 15-49 years)[20]	11.6		
Violence against women ever experienced, intimate partner[21] (% of female population ages 15 and older)	38.0		

Source: HDR UNDP 2020, http://hdr.undp.org/en/countries

Türkiye's Human Development Index (HDI) for 2019 is 0.820. However, when the value is discounted for inequality, the HDI falls to 0.683, a loss of 16.7 percent due to inequality in the distribution of the HDI dimension indices. The inequality-adjusted HDI also influence the HDI ranking of Türkiye which fall with 11 places in the overall country ranking. The 2019 female HDI value for Türkiye is 0.784 in contrast with 0.848 for males, resulting in a GDI value of 0.924, placing it into Group 4 comprising countries with medium to low equality in HDI achievements between women and men.

Türkiye has a Gender Inequality Index (GII) value of 0.306, ranking it 68 out of 162 countries in the 2019 index. Women's political participation and representation in national and local elected bodies in Türkiye remains below the global average. According to the World Economic Forum's Global Gender Gap Report 2021, Türkiye ranks 114th in political empowerment for women and 140th in economic participation and opportunity. As of 2021, only one of 17 government ministers is a woman, and only 17.4% of parliamentarians in the Turkish Grand National Assembly (TGNA) are women, which shows a slow improvement of 2% since 2016, but is still well below the global average of 25.5%. Women are also significantly under-represented in local politics, with 10.1% of seats in local government held by women. As of 2019, only 3% of mayors, 11% of municipal councillors and just over 2% of *Muhtars* (village heads) were women.[22]

Türkiye has an overall rank of 133 in the World Economic Forum (WEF) global gender gap index, with a declining rank since 2018 where it ranked 130. In 2020, global gender gap index for Türkiye was 0.64. Global gender gap index of Türkiye increased from 0.59 in 2006 to 0.64 in 2020 growing at an annual rate of 0.62%. The four main components of the index; economic participation, educational attainment, health and survival, and political empowerment show different scales of progress. The change in Global Gap Index (GGI) score from 2020 to 2021 is -3 indicating an increasing gender gap. This is mainly due to an increase in the gender gap in health and survival, and political empowerment, which has seen an increased gender gap in 2021 compared to 2020.

The ranking of Türkiye on the GGI for health and survival has dropped significantly from 64 in 2020 to 105 in 2021 with a score of 0.967 compared to 0.976 since 2018. In comparison, the GGI for political empowerment has only seen a slight decrease in score from 0.124 in 2020 to 0.123 in 2021, leading to a slight drop in ranking from 113 to 114. While education attainment had seen a drop from 2018 to 2020, this has now improved and has a score in 2021 that is higher than the 2018 score. The GGI educational attainment in 2021 is 0.975 leading to a rank as 101 in the index. Economic participation and opportunity are where Türkiye has the lowest ranking. GGI for economic participation and opportunity has a score of 0.486 in 2021 leaving Türkiye with a rank of 140; this ranking has declined every year since 2018. While progress has been made over the years, the ranking has dropped as an indication of other countries making more significant progress. According to the joint study by ILO Türkiye Office and TURKSTAT, the national gender wage gap in Türkiye is of 15.6%[23].

The calculated country ranking for Türkiye in the World Bank's Women, Business and Law report 2018 is 70.1 (with a maximum of 100). While Türkiye scores 100 on accessing institutions and using property, and 93.8 on protecting women from violence, the scores related to the labour market are much lower. This is particularly the case for 'getting a job' and 'going to court' scoring 72 and 75 respectively, while 'providing incentives to work' scoring 50 and 'building credit' scoring 0. These scores are indications of the great difficulties women face in the labour market,

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[20] Percentage of married or in-union women of reproductive age (15-49 years) who are fecund have an unmet need if they want to have no (more) births, or if they want to postpone or are undecided about the timing of their next birth, yet they are not using any method of contraception.

[21] No data available for non-intimate partner violence

[22] UN Women, 2021. Turkey profile. Available from: Leadership and Political Participation

[23] ILO, 2020. ILO Gender Wage Gap Turkey

as entrepreneurs and business owners. In total, Türkiye ranks 80 of 189 countries in the Women, Business and Law report.[24]

Women with multiple vulnerabilities according to the EBRD, vulnerable groups refer to people who, by virtue of gender identity, ethnicity, age, disability, economic disadvantage, or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits. Vulnerable individuals and/or groups may also include people living below the poverty line, the landless, the elderly, women and children headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected by national and/or international law[25].

In the following some insights related to women's vulnerabilities specifically related to the Project are outlined.

The main population groups that **may potentially be vulnerable in the context of the Project** and the rationale for their identification are outlined in Table 3.2 below.

Table 3.2: Overview of Vulnerable Groups

Group	Description
Generic Vulnerability	
Women	Due to the nature of domestic relations, women may be reliant on the male members of the family for financial support. As such they are less likely to have access to financial assets.
Ethnic minorities	Some groups, including migrants and refugees, may be marginalized with reduced access to healthcare, education, freedom of speech, credit, and other services. In most cases ethnic minority groups have their own language, which is not the language practiced by the dominant ethnic group.
Children	In order to access assets/resources children are often reliant on older members of the households or community. When a child is not adequately represented by an adult, from a low-income family or an ethnic minority, (s)he may be vulnerable to exploitation within the community or workplace.
Youth	Youth may be vulnerable in terms of access to assets, education, or employment opportunities.
Elderly/retired	Retired members of the community may have a minimal income and are more likely to have reduced physical or mental capacity to cope with changes to their environment. In addition, in many settlements, the elderly may be reliant on subsistence farming, which would make them specifically vulnerable, as the loss of land can mean the loss of food.
Low-income households[26]	Low-income households have fewer resources on which to rely and are less likely to have savings and/or access to credit, which make them vulnerable to shocks and change.
Physical/mental health and disability	Those who lack physical mobility or who have mental health issues may be vulnerable to changes and unable to participate in decision making

Women have fewer options on the labour market than men, which make them more vulnerable to poverty. Within Area of Influence (AoI) of the Project, women seem, however, to be more employed than men as a result of the presence of light-industry (textiles, automotive parts requiring sewing or coating) and agriculture.

As a result of the field studies conducted under the Project's Livelihood Restoration Plan (LRP), 15 female headed households were identified in the Project AoI -1 house and 14 employees of the businesses. In order to facilitate access to information and participation in stakeholder meetings for women living in rural areas and in disadvantaged circumstances, particularly single mothers, women living in poverty, unemployed women, or those exposed to

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[24] World Bank, 2018. Women's Workplace Equality Index

[25] EBRD. 2019. ERBD Performance Requirement 5. Land Acquisition, Involuntary Resettlement and Economic Displacement. Available from: EBRD Performance Requirement 5

[26] As of 1 January 2026, the net monthly minimum wage in Turkey is 28,075.50 Turkish Lira (approximately €660) per month, and the gross monthly minimum wage is 33,030 Turkish Lira. Households on low income are defined as those earning the minimum national wage or below.

violence, meetings are organized at times convenient for women. In cases where participation is not possible, their access to information is supported through random interviews.

Sometimes women and girls experience multiple vulnerabilities at the same time (e.g., an elderly woman with disabilities living in poverty; a women survivor of gender-based violence who belongs to a migrant community)While assessing women's levels of vulnerability, due consideration is given to the concept of intersectionality —– for example, the interaction between youth and gender in the labour market.

Such intersectionality was taken into consideration for the following vulnerable groups, where women within each of these are considered particular vulnerable:

- ✓ The presence of refugee groups of Syrian, Iraqi, Iranian, Pakistani, and Afghan nationality has been identified within the Project's area of influence. These groups are employed in various sectors, and it has been noted that accommodation expenses for some are covered by their employers. No homeless refugees or foreign nationals were identified within the Project's area of influence.
- ✓ The burden of chronic diseases, such as ischemic heart disease and diabetes is highest among elderly residents. During sensitivity analysis, it was identified that among the citizens affected by the Project, 9 with chronic illnesses, 1 physical and 1 mental disabled, and 3 people aged 65 and above have been determined and assessed under vulnerability.
- ✓ Decline in agricultural production or income obtained from the trade of agricultural products: The rapid urbanization of Başakşehir district resulted in the reduction of agricultural areas, which affected rural households living from natural resources-based livelihoods (especially women who are mostly employed in this sector), as reported per the rural neighbourhoods of the district. In addition to all these measures, the Project's potential impacts on livelihoods have been minimized, and necessary support has been and continues to be provided to stakeholders whose livelihoods are affected, within the scope of the LRP.
- ✓ Unemployment and low income: This is an issue in some of the settlement of the AoI. The temporary loss of business infrastructures due to land resettlement could potentially enhance this issue.

3.1.2 Gender-Based Violence and Harassment (GBVH)

Turkish women, as many other women across the world, regardless of their country's level of income, face the threat of violence against them. Tolerance as well as the experience of domestic violence form significant barriers to women's empowerment and women's autonomy in all spheres of social life. This has adverse consequences for women's health, health-seeking behaviour, and the health of their children. The prevalence of gender-based violence in Türkiye is not easy to estimate and compare with other countries. The Turkish Demographic and Health Survey (TDHS)[27] does not cover questions of gender-based violence prevalence (whether women have ever experienced GBVH) but includes only questions related to the justifications of violence, and the Türkiye Domestic Violence Survey (TDVS) is a stand-alone country survey which does not provided cross-country comparison.

Regarding physical and/or sexual violence incidence, the TDVS 2008, showed that 13.7 percent of ever-married Turkish women reported having experienced physical and/or sexual violence by their husband or intimate partner in the 12 months before to the survey. This number went down to 11 percent by 2014. The prevalence of lifetime physical and/or sexual domestic violence has also gone down from 41.9 percent in 2008 to 37.5 percent in 2014. Such declines are important, although relatively small. The prevalence rate observed for European countries in the survey conducted by the EU Agency for Fundamental Rights in 2012 shows a lifetime prevalence of 33 percent as an average of the EU-28 countries included, and an 8 percent average of women reporting having experienced violence in the 12 months before the survey.[28] As mentioned above, the Türkiye Demographic and Health Survey ask people about their perception on justification of violence. The TDHS published in 2018 identified that about 9% of women believed that physical violence was justified at least under one specific circumstance. This is less than in 2013, when 13% of women found Gender Based Violence (GBV) justifiable[29] and shows a slow change in the perception and acceptance of gender-based violence among women.

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[27] The TDHS is conducted by Hacettepe University Institute of Population Studies every five years.

[28] World Bank. Turkey gender country assessment 2018.

[29] Hacettepe University Institute of Population Studies Ankara. 2018 Turkey Demographic and Health Survey. Demographic and Health Survey

There are several socio-economic determinants for gender-based violence. The prevalence of physical and/or sexual violence is lowest among women with tertiary education, and when the woman's partner has tertiary education, regardless of the woman's education. Although economic empowerment does not always protect women from violence, there is evidence to suggest that it is a key determinant. Women who are in formal employment are less likely to experience violence than those in informal/irregular employment, and as likely as nonworking women to experience violence. Ownership of the home, although very low, is linked to a much lower level of violence incidence, but women who provide the main income source for the household are at a higher likelihood of violence than other levels of income contribution.[30] There are no data available on non-intimate partner violence[31].

GBVH is rooted in gender inequality and unequal power and are enabled by gender stereotypes. Despite these determinants, the 4th National Plan for Combating Violence Against Women (2021-2025), which was announced on the day Türkiye withdrew from the Istanbul Convention, makes no reference to gender equality and no reference to the Istanbul Convention which provides the roadmap for combating violence.

Although no update of the TDVS has been made since Türkiye's withdrawal from the Convention, civil society organizations describe a rising prevalence of violence against women, including femicide. According to the Justice Ministry, recent years have seen an average of 400 femicides a year. In 2018, 440 women were murdered, of which about one quarter by their husbands. In 2019, the number was 474, the highest in a decade. Most of the killings were by partners or other family members[32]. According to the *We Will Stop Femicide* (Kadın Cinayetlerini Durduracağız) platform, the most recent figures are inconclusive. In 2020, the courts registered 300 femicides, though another 171 women were killed under suspicious circumstances, some of which were ruled to be suicides.[33] The Federation of Women's Association of Türkiye (Türkiye Kadın Dernekleri Federasyonu) is working to secure gender equality and defines the violence suffered by women, girls and LGBTQI individuals as fundamental violation of human rights and discrimination. The organization provides support services for GBVH survivors through their emergency hotline, legal and psychological support.[34]

There are several support service providers for GBVH as summarized below. The Company and EPC Contractor will ensure that Gender Lead and Focal Point are aware of the below listed service providers and assist the employees h to contact these when needed.

- ✓ **Police Stations and Gendarme Stations:** Victims of domestic violence or those in danger of being subjected to violence may file a complaint at their closest police or gendarmerie station. The police or gendarmerie shall take preventive and protective measures in cases where immediate measures are required and shall refer to the Public Prosecutor's Office in cases where no immediate action is required.
- ✓ **Public Prosecutor's Office:** Persons who have been subjected to violence or are in danger of being subjected to violence may also apply to the Public Prosecutor's Office at the courthouse to file a complaint and request necessary measures to be taken for their protection and remedy.
- ✓ **Family Court Judge:** Victims of violence or those who are at risk of being subjected to violence may apply to the judge of the Family Court in the province where they are located and request protective measures to be taken in order to keep them safe. Where there is no Family Court, an application can be made to the judge of the Civil Court of First Instance. The judge shall decide on the necessary preventive and protective measures. Furthermore, legal proceedings can be initiated.
- ✓ **Social Service Counselling Line for Families, Women, Children and Disabled Persons (ALO 183):** ALO 183 is free of charge and can be reached 24/7 from anywhere in Türkiye. The ALO 183 hotline, which is operated by the Ministry of Family and Social Policies, provides psychological, legal and economic counselling services to people who have been subject to violence or are in danger of being subjected to violence and who need support. The hotline provides information on services they can use and support organizations they can contact for further help, such as local women's organizations, women's shelters etc.

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[30] Turkey Domestic Violence Survey, 2014.

[31] "*Intimate partner violence is one of the most common forms of violence against women and includes physical, sexual, and emotional abuse and controlling behaviours by an intimate partner*" https://apps.who.int/iris/bitstream/handle/10665/77432/WHO_RHR_12.36_eng.pdf

[32] Zambrana, M., 2021. Turkey takes a step backwards on violence against women. Equal Times, 1 September 2021

[33] Kadın Cinayetlerini Durduracağız is part of the Borgen Project, We Will Stop Femicide, Turkey

[34] Türkiye Kadın Dernekleri Federasyonu GBVH survivors support

- ✓ **Emergency Telephone Lines:** Apart from ALO 183, there are several emergency telephone lines that can be reached 24/7 which include:
    - 112 Police Help,
    - 112 Gendarme Help
    - 112 Emergency
    - 0212 656 96 96 Domestic Violence Emergency Helpline
    - 444 43 06 Gelincik Line for Ankara
- ✓ **Provincial Directorates of Family and Social Policies:** The Provincial Directorate of Family and Social Policies, the District Directorate of Family and Social Policies, or Family Counselling Centres and Community Centres are places where victims of violence can seek further support. Services they receive there are free of charge and include the following: Counselling, Guidance, as well as Routing services.
- ✓ **Ministry of Interior:** Ministry of Interior developed an official application called Kadin Destek Uygulamasi (KADES - Women's Emergency Support Notification System) which is an emergency response application developed in order to prevent violence against women. Women who have been subjected to violence by their spouses or someone else. Women who are likely to be exposed to violence can quickly reach the KADES, which was established for this work, by making a report through mobile application already downloaded at their smart phones.
- ✓ Women who are victims of domestic violence and violence against women can activate the KADES by entering the Turkish Republic ID Number and then using the activation code. By turning on the device location information, the closest police team will be dispatched to the scene where the call for help was made, and intervention will be provided.
- ✓ **SONIM:** The Ministry of Family and Social Services of the Republic of Türkiye has put in place a Violence Prevention and Monitoring Center (SONIM) which provides support for women throughout the country as well as help centers. SONIM is the place where women who are exposed to violence come to stay away from violence and have access various supports. Violence Prevention and Monitoring Center hosts the person for a while and these centers are “confidential” centers. The names and locations of such places are "confidential" so that the women do not feel a threat again.
- ✓ **Women Shelters:** Women’s shelters, that are also known as guesthouses in Türkiye, were established to meet the temporary accommodation needs of women who have been subject to domestic violence or are at risk or becoming a victim of domestic violence. Women’s shelter’s provide temporary accommodation and protection to women and their children, if any, that were or are at risk of domestic violence. This service is provided by several institutions and organizations, such as the General Directorate on the Status of Women of the Ministry of Family and Social Policies, non-governmental organizations (NGO’s), municipalities, district governorships and governorships.
- ✓ The duration of stay in shelters is initially six months, but can be extended, if necessary. Girls or boys between the ages of 0 and 12 can stay together with their mothers in a shelter/guesthouse. Boys and girls under the age of 18 years are placed in dormitories under the General Directorate of Child Services of the Ministry of Family and Social Policies after an assessment of their situation. Girls under the age of 18 can stay together with their mothers in a guesthouse. Women over the age of 12 years with male children and women with disabled children are provided with rent and subsistence accommodation if deemed appropriate by the Violence Prevention and Monitoring Centre (ŞÖNİM).
- ✓ **Mor Çatı Women’s Shelter Foundation:** Mor Çatı is an NGO that was established in 1990 by feminists in order to combat violence against women. At Mor Çatı, the work against male violence is grounded in feminist principles, aiming for women to be able to build lives unhindered by gender-based discrimination and male violence under free and equal conditions.
- ✓ Mor Çatı monitors and reports on the implementation of national and international conventions, laws, and regulations as well as making policy recommendations to decision-makers in order to eradicate violence and achieve gender equality. Mor Çatı holds workshops with women’s organizations, civil society organizations

(NGOs), bar associations and municipalities active in combating violence in order to share our information and experiences in the field.

- ✓ **Health centres:** People who have been subject to domestic violence or are at risk of becoming a victim of such violence, can apply to the nearest health institutions (such as health center, family medicine center, emergency service points of hospitals etc.) for supporting medical services. If violence has been experienced, the necessary treatment is carried out and a report documenting the violence experienced is issued. In urgent cases the 112-emergency help phone should directly be called.
- ✓ **Bar Associations:** Those who are not in a position to pay a lawyer's fee to proceed with or initiate a lawsuit against their perpetrators may apply to their local bar association to benefit from free legal aid. Documents required for an application are the following: Identity card, proof of residence and a poverty certificate from Mukhtar. If there is a Women's Counselling Centre affiliated to the Bar Association, it is possible to apply directly through the center for free legal aid.
- ✓ **Women Solidarity Centers of Municipalities:** Psychological, medical, financial and legal support is provided in women's support units of the respective municipalities. In addition, free accommodation is also provided in women's shelters or guest houses.
- ✓ **Women's Solidarity Foundation (Ankara):** Women's Solidarity Foundation (Ankara): The Foundation for Women's Solidarity is an independent women's organization, founded in 1993, aiming to combat all forms of violence against women, provide legal, social, and psychological support, and carry out advocacy and awareness-raising activities.
- ✓ **Federation of Women's Associations (WAF) / Türkiye Kadın Dernekleri Federasyonu (TKDF):** Founded in 1976, the Federation works toward the material and spiritual development of society through women's advancement, operating a network of branches and advocating for gender equality, legal reform, education, and civil society coordination. **Phone: +90 212 656 9696**

3.2 WOMEN'S ECONOMIC EMPOWERMENT IN THE TRANSPORT AND CONSTRUCTION SECTOR IN TÜRKIYE

Equality in opportunities to access productive employment and income generation is not only about fairness. Gender gaps in participation in the labour market and entrepreneurship entail substantial economic losses for women and their families in the form of foregone income, but also losses in aggregate terms for the societies where women are deprived of those opportunities. Despite recent progress, Türkiye shows one of the highest gender gaps in labour force participation among upper-middle-income countries from the European and Central Asia (ECA) region. While for men there are only slight differences in participation between Türkiye and the average among upper-middle-income countries, Turkish women participate at rates of about 34 percent compared to 55 percent on average in upper-middle-income countries in 2020.

However, it must be noted that Türkiye continues to be one of the few OECD countries where female labour force participation rates have decreased since the 1980s. Lately, there have been efforts in Türkiye to enhance women's employability and the reconciliation between personal and professional life, including improvements in the legislations on maternity leave, entitlement for work part-time for parents, and entitlement for period of breastfeeding leave for female workers during the first year after giving birth. Initiatives for increasing the number of day-care centers and preschools have also been implemented.

Education is a significant determinant of women's participation in the labour market, particularly in urban parts of Türkiye. It is easier for educated women to cope with strong gender inequalities within the labour market. Labour force participation rates increase with respect to education level, reaching the highest rates for women with university degrees. Although, the number of women professionals is lower than men, this difference is smaller than the one between women and men's participation rates in other patterns of work. However, relatively higher rates of women's participation in professional work do not guarantee the equal participation of women. Occupational segregation is very evident in highly skilled work areas such that although women's participation rates are relatively high, women are generally restricted to professions that are assumed to be appropriate for women and that are less competitive and less prestigious. The technical professions have generally been assumed to be inappropriate for women. Moreover, women are concentrated in the lower levels of the occupational hierarchy and hold less high level or decision-making positions. Exclusion of women from male dominated professions such as engineering, has

Social and ideological bases such as masculine character of identity, ethics, and culture of professions, and structurally appears within the professional associations and educational institutions.[35]

Like in many other countries, a pattern of gender segregation by field of study can be observed at the tertiary level in Türkiye. Women are disproportionately represented in certain fields including health, education, and humanities and arts; similar shares of women and men are enrolled in social sciences programs while engineering, manufacturing, construction, and services remain male-dominated. The socioeconomic background of women seems to contribute to these decisions.

Gender-biased stereotypes and sexist attitudes prevail in the educational system in Türkiye, although improvements have taken place after the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). According to UNESCO, lower-secondary school textbooks show more men than women, and the professional affiliations featured differ between them, with more women than men taking part in family-related roles and generally being represented with objects of private life. Within the latest reform, the curricula have been updated in Türkiye, and gender-related training is being provided to teachers to address such discriminatory behaviours and stereotypes[36]

Several initiatives have also been taken to address inequalities in technical education:

- ✓ Engineer Girls of Türkiye is a program implemented by UNDP in cooperation with Ministry of Family and Social Policies and Rönesans Foundation. The program supports female students in electrical, electronics, industrial, construction, mechanical, computer and environmental engineering departments of state universities. Engineer Girls of Türkiye encourages female student in high school to pursue engineering profession and create awareness of engineering profession opportunities. Girls are supported with scholarships for university education, internship opportunities in Rönesans and other organizations in the sector, mentoring support through female engineers, on-line education, and employment opportunities in Rönesans. The program also advocates gender mainstreaming in the private sector and disseminates the success stories to support the business case. The long term expected impact of the Project is to increase women's high-quality employment and advocate gender equality principles in the leading services and manufacturing sectors to improve inclusiveness of economic growth in a sustainable manner. [37]
- ✓ The Association of Construction and Women (İnşaat ve Kadın Derneği, IVKAD) aims to strengthen the presence, promote the status, and to contribute to the increase of women in the construction sector. To facilitate experience sharing among women in the sector and women who work in areas which complements and supports the construction sector including urban planners, architects, technicians, engineers, and women with vocational education among others — to increase the employment rate and improve working conditions of highly-qualified woman workers.[38]

While the construction sector in Türkiye has played an important role in growth and has been seen as one of the driving forces of the Turkish economy in the last two decades, it has experienced a significant contraction in recent years[39]. Unemployment among civil engineers is at an all-time high in Türkiye. A study released by the Chambers of Civil Engineers in 2021, states that 28.2 percent of civil engineers are unemployed. This disparity is even more pronounced among female and young engineers under the age of 35. The study also shows that 27.5% of civil engineers are paid below the minimum wage. These issues are not limited to civil engineers but affect the whole construction sector. [40] COVID-19 brought restrictions that forced many companies to close their businesses. Workers took unpaid leave or earned less than minimum wage. Young people, especially young women, were among the groups of workers that endured heavier employment losses.[41]

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[35] UNDP, 2021.

[36] UNESCO, 2019. Global Education Monitoring Report.

[38] IVKAD, 2022. The Association of Construction and Women

[39] Tekçe, M., 2021. Impact of COVID-19 Pandemic on Turkish Construction Sector. KIEP

[40] The Reality of Civil Engineers in Turkey: Job, Employment and Unemployment. Chamber of Civil Engineers (IMO), 2021.

[41] International Labour Organization. December 2020. The impact of the pandemic on employment in Turkey: What would have happened without COVID-19? Available from: ILO Research Brief

Türkiye is one of the countries where women are less represented among entrepreneurs and business owners. According to the Women Entrepreneurs Association of Türkiye (Türkiye Kadın Girişimciler Derneği, KAGIDER) women entrepreneurship rate is very low in Türkiye, women owned SME are underrepresented in the economy, international trade, and public procurement. In 2019 women entrepreneurs constitute only 8.8% compared to a rate of 29% in Europe. Main challenges are access to finance, access to information, training, and business networks. One of the key issues is the limited access to collateral with only 7% of collateral in Türkiye held by women[42].

Based on the Business Environment and Enterprise Performance Survey (BEEPS) 2019 data[43], women appear to have fewer chances than men to participate in business ownership and are even less likely to manage them. Only 5 percent of businesses in Türkiye have a woman among top management in contrast to 20 percent on average for ECA.[44] The BEEP data also confirm the persistence of gender segregation in female compared to male firm's management and ownership.

4 PROJECT GENDER IMPACTS AND OPPORTUNITIES

The Project may have on nearby communities and society at large; however, these impacts are mitigated by the Project's Gender Action Plan including Gender-Based Violence and Harassment. The Project also holds significant opportunities for improving women's equality, especially through employment.

4.1 PROJECT RELATED GENDER IMPACTS AND RISKS

The average workforce per month during overall construction period is estimated at 1,959 personnel. The influx of significant workforce is the driver of main gender impacts of the Project. Influx of construction workers may cause tension between the local population and non-local workers due to the belief that non-locals are taking the economic opportunities of the resident population. Furthermore, interactions between male-workers and women living in the local communities may create frictions within the community. At the same time, influx of male workers may pose a threat to women workers and community in terms of safety and GBVH. This may also translate to heightened tension leading to violence.

Furthermore, it is often the case with large construction projects that individuals move to the area looking to benefit either from direct work or from indirect economic opportunities. Such influx of opportunity seekers would be unmanaged and, should it be significant, are likely to pressure the limited services and infrastructure in the local communities. A high degree of influx could result in other effects such as inflation, socioeconomic tensions, and changes to behavioural norms.

The table below lists impacts and risk related to the Project identified as part of the ESIA process, which have gender implications. On the other hand, as a result of the audits of gender-based relevant management systems - plans, procedures etc.-, provided trainings, implementation practices, and interviews with both local people and employees conducted within the scope of independent consultancy services, it was determined that some of the impacts identified during ESIA period were eliminated or mitigated.

[42] KAGIDER, 2019. Views and Demands on Gender Equality and Women's Economic Entrepreneurs

[43] EBRD/World Bank, 2019. Business Environment and Enterprise Performance Survey

[44] World Bank. Turkey gender country assessment, 2018.

Table 4.1: Project Related Gender Impacts and Risks in ESIA

Aspect	Impact Summary	Gender Implications	Implemented Mitigation Measures
Labour and working conditions			
Direct employment	It is estimated that an average of 1,959 personnel will be employed throughout the duration of the Project, with peak of 3,465 workers during construction. The Project is expected to generate positive effects on local economic and employment conditions at the regional level throughout its life cycle. Primary impacts are expected to take place during the construction phase through the creation of temporary employment opportunities. The Project will also create long-term benefits associated with capacity enhancement of local labour through on-the-job training, allowing them to improve skills and gain experience that can improve opportunities for future employment within the construction sector. The operation phase will generate limited long-term employment opportunities mainly for toll collection, road maintenance, environmental, health and safety, and monitoring activities. The exact size of the workforce needed for operation is not determined at this stage.	Women are less likely to benefit from enhanced employment opportunities in the construction and transport sector. While efforts are being made to enhance women's employment in the construction and transport sector, women's participation remains low. Generally female engineers are working less in construction than other engineering related jobs. However, it is understood the Rönesans already employ a significant number of female engineers. Unemployment rate among female engineers is higher than for the male counterparts.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Labour Management Plan (LMP) ✓ Stakeholder Engagement Plan (SEP) ✓ Gender Action Plan (GAP) ✓ Gender-sensitive Women Grievance Mechanism (GM) ✓ Human Right Policy ✓ Disciplinary Regulation Zero Tolerance Policy ✓ Rönesans Ethics and Code of Conduct Also, the implemented mitigation measures are presented in Table 5.1.
Indirect employment	The Project will represent an opportunity for Turkish companies to tender for work on different project-related components and basic services such as food supply and maintenance.	There are generally less women led business and entrepreneurs in Turkey, and they are less likely to benefit from the Project as few of them are construction related businesses.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Supply Chain Management Plan (SCMP) ✓ Contractor Management Plan (CMP) ✓ Labour Management Plan (LMP) ✓ Stakeholder Engagement Plan (SEP) ✓ Gender Action Plan (GAP) Grievance Mechanism (GM) Also, the implemented mitigation measures are presented in Table 5.1.

Working conditions and occupational health and safety	As any large-scale construction activity, the Project has several risks associated with the working conditions and OHS, including: • Risk of violations of working conditions and OHS in the construction industry. • Risk related to the widespread use of informal workers, including migrants and refugees.	There may be differences in the risk that working conditions pose to men and women. • Risk of gender-based discrimination during recruitment and subsequent working conditions offered. • Risk of OHS decision not based on gender-responsive approach resulting on women not having access to PPE specifically designed for them.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. Health and Safety Plan (HSP) ✓ Labour Management Plan (LMP) ✓ Human Right Policy (HRP) ✓ Stakeholder Engagement Plan (SEP) ✓ Gender Action Plan (GAP) ✓ Grievance Mechanism (GM) *Also, in the context of the NBM Project, a gender quota has been incorporated into the recruitment policy, and hiring processes are carried out in a transparent and fair manner. In addition, PPE suitable for the physical characteristics of employees is provided, ensuring that both men and women have equal access to appropriate protective equipment.* The implemented mitigation measures are presented in Table 5.1.

Construction workers accommodation	Construction personnel will be provided with facilities for accommodation, meals, sanitation, and welfare at campsites. Welfare provision includes, but not limited to, collective social/rest spaces, recreational facilities, dedicated places for religious observance (if the context warrants), and access to public phones and internet facilities (particularly in the case of a larger number of expatriates).	Women have specific needs in relation to facilities such as sanitation and accommodation. As women are facing risk of GBVH in the workplace in general and workers' accommodation in particular, the need for safe and private facilities are important. Lack of access to clean, safe, secure, and separate sanitation facilities can create or exacerbate health problems for workers as well as put them at risk of violence, including sexual violence. There are currently 1033 workers (976 men workers, 57 women workers). 71 REC workers and 608 subcontractor workers have been staying in campsites. There are no women staying in campsites. All female employees are commuting from home every day; free private transportation service is provided by SPV in a wide network. The 57 women workers are employed as cleaning services, security and catering. There is rental assistance available for some female engineers.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Health and Safety Management Plan (HSMP) ✓ Camp Management Plan ✓ Stakeholder Engagement Plan (SEP) ✓ Gender Action Plan (GAP) ✓ Grievance Mechanism (GM) In addition, such issues are not considered risks in the Project. Accommodation areas, construction sites, and health facilities are designed in a way that mitigates these risks, ensuring gender-sensitive arrangements and protecting personal privacy. There are currently 2,121workers (2038 men workers, 83 women workers). 5 SPV workers, 170 REC workers and 1946 subcontractor workers have been staying in campsites. -8 women staying in campsites. 75 female employees are commuting from home every day; free private transportation service is provided by SPV in a wide network. The 17 women workers are H&S Specialist, 1 woman working as geomatics engineer,1 woman corking as an archaeologist 1 women working as site manager and the 41 women workers are employed as cleaning services, and catering. There is rental assistance available for some female engineers. Also, the implemented mitigation measures are presented in Table 5.1.

GBVH at the workplace	Any large workplace has risk of GBVH, especially in settings where male workers are more often in a supervising position. Turkeys' withdrawal from the Istanbul Convention, has increased the risk of GBVH.	Violence against women, more than any other form of sex discrimination in the workplace, violates fundamental human rights. Workplace violence represents a significant barrier to women accessing jobs and progressing to successful careers.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Gender-Based Violence Policy (GBVP) ✓ Gender-Based Grievance Mechanism (GM) ✓ Stakeholder Engagement Plan (SEP) ✓ Gender Action Plan (GAP) ✓ Human Right Policy ✓ Disciplinary Regulation Zero Tolerance Policy ✓ Rönesans Ethics and Code of Conduct The implemented mitigation measures are presented in Table 5.1.
Community Health, Safety and Security			
Increased traffic	The Project will lead to increased traffic during construction and operation.	There may be significant gender differences in the mobility patterns of population in the neighbouring communities. Such differences should be considered when designing the transport routes of heavy construction materials, waste disposals etc.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Community Health, Safety and Security Management Plan (CHSSMP) ✓ Traffic Management Plan (TMP) ✓ Stakeholder Engagement Plan (SEP) ✓ Grievance Mechanism (GM) Particularly, there is no gender discrimination in the field of community health and safety. Priority is given to women, children, and vulnerable groups. Also, the implemented mitigation measures are presented in Table 5.1.

Increased transmission of communicable diseases	The presence of workforce living in work camps could lead to increased transmission of communicable diseases including COVID-19 and STDs, within the workforce and the nearby communities.	Women are more susceptible and vulnerable to STDs, including HIV	The Plan, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. Health and Safety Management Plan (HSMP) ✓ Community Health, Safety and Security Management Plan (CHSSMP) ✓ Camp Management Plan (CMP) ✓ Stakeholder Engagement Plan (SEP) ✓ Gender Action Plan (GAP) ✓ Grievance Mechanism (GM) Female employees have been informed that communication channels are open for them within the company. Also, the implemented mitigation measures are presented in Table 5.1.
Increased risk of GBVH	The construction will result in changes in local communities, including influx of workers and changes in households' dynamics that can exacerbate the risk of GBVH in both public and private spaces. The COVID-19 pandemic has exacerbated the prevalence of GBVH. The presence of security personnel during construction may constitute risk to communities if not appropriately trained.	Women are most often disproportionately affected by influx of workers. Particular at risk are women experiencing multiple vulnerabilities. Women's more marginalized position in relation to economic opportunities, access to resources and participation in decision-making can increase vulnerability and exacerbate risk of GBVH. According to EBRD/IFC/CDC 'Addressing GBVH in the Construction Sector' and 'Emerging Good Practice for the Private Sector on Addressing GBVH', risks of GBVH may also occur in the land acquisition processes or during public consultation processes in general.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. Resettlement Action Plan (RAP) ✓ Stakeholder Engagement Plan (SEP) ✓ Gender Action Plan (GAP) ✓ Grievance Mechanism (GM) ✓ Gender-Based Violence and Harassment Policy (GBVH) Also, the implemented mitigation measures are presented in Table 5.1.
Access to infrastructure and services			

Disruption to infrastructure and utilities during construction	Construction activities will induce impacts on utilities and infrastructure, mainly due to site clearance works, excavation and movement of soil, embankment construction and construction of various elements of the highway. This is likely to generate pressure on existing local utility supplies (which already have temporary disruption), disturbance of traffic and transportation due to road crossings, and short term planned and unplanned disruption of electricity, telecommunication, sewerage, storm water lines, natural gas and water supply for irrigation, domestic, drinking, and industrial purposes.	As women are likely to spend more at home and responsible for most of the housework, therefore experiencing more direct impacts from utility disruption such as water supply and electricity during construction hours. According to the RAP survey nearly half of the project affected women say they are housewives.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Community Health, Safety and Security Management Plan (CHSSMP) ✓ Stakeholder Engagement Plan (SEP) ✓ Grievance Mechanism (GM) Also, the implemented mitigation measures are presented in Table 5.1.
Community cohesion			
Disturbance from presence of workforce	Tension between the local population and non-local workers may arise due to the perception of local population missing out on opportunities. Influx of opportunity seekers is likely to put pressure on utilities, services, and infrastructure in the local communities. A high degree of influx could result in other effects such as inflation, socioeconomic tension, and changes to behavioural norms.	Any tension in the communities is likely to adversely affect vulnerable households, including female headed households and women in the community in general. Women with multiple vulnerabilities are at higher risk.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Stakeholder Engagement Plan (SEP) ✓ Grievance Mechanism (GM) Also, the implemented mitigation measures are presented in Table 5.1.
Community severance	The construction of the highway is likely to cause communities, households, and individuals to be affected by severance of resources, infrastructure, and communities. Severance issues include households no longer having direct access to part of their land, social infrastructure, or other neighbour hoods etc., due to physical barrier posed by the Project. The harmful effects on community severance are not limited to restriction of movement, but also include psychological consequences on individuals which, experienced collectively, permeate the social fabric of the community.	Severance is likely to impact women and vulnerable people more, as they may have less opportunity for mobility and at the same time depend more on the social connectivity in the community or neighbourhoods in which they live. Women experiencing multiple vulnerabilities are most at risk.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Community Health, Safety and Security Management Plan (CHSSMP) ✓ Stakeholder Engagement Plan (SEP) ✓ Grievance Mechanism (GM) Also, the implemented mitigation measures are presented in Table 5.1.

Land acquisition and easement			
Permanent loss of land, residential houses, and businesses	Within the expropriation corridor for the Project there will be permanent removal of houses and structures, land clearance and permanent removal of all crops and vegetation, and permanent restricted access. Landowners and users lose land-based livelihoods and loss of land will also impact households engaged in animal husbandry as they lose access to grazing areas. All affected businesses to be relocated are small to medium sized businesses. Almost all business owners anticipate facing a temporary business interruption period (reportedly between 7 days to 150 days, and on average 60 days) due to relocation. Half of the affected businesses reportedly employ migrant employees. Women are employed in four of the affected businesses.	Households with low income and high land dependency for subsistence and income generation are most vulnerable to the loss of land. • In addition, households with disabled and elderly household members as well as female or child headed households are particularly vulnerable to potential loss of livelihoods related to land access restrictions. • Households affected includes 40 female headed household (widows/divorced), and 35 female headed households with an economic active male. • There is no additional provision for women within the Expropriation Law, as the implementation of law is expected to be practiced equally for women and men rightsholders. • 9 of the affected households are female headed. A total of 211 women are affected in the 150 households. Nearly half of the affected women are reportedly housewives, although some of these in rural areas are likely to work in agriculture. • Informal workers in the agriculture sector, where women are under predominant risk of not being compensated sufficiently and struggle to find other types of income, are particularly vulnerable in the case of reduction of available agricultural land.. • One of the residential houses inhabited by women experiences multiple vulnerabilities due to chronical diseases, age and being female headed. • Another household vulnerable due to a disabled child may be relocated during operation phase. • Several of the businesses to be relocated have female employees; 37 women will be affected as employees of business to be economic displaced of which 33 will experience relocation of their business. Only 8 of these are owners of the structure while 29 are tenants. 6 of the owners are in construction building, while the remaining are in manufacturing. • Migrant workers are identified among the employees at the affected businesses. Where such workers are women, they face multiple vulnerabilities.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Resettlement Action Plan (RAP) ✓ Stakeholder Engagement Plan (SEP) ✓ Grievance Mechanism (GM) ✓ Livelihood Restoration Plan (LRP) *(under preparation)* Also, the implemented mitigation measures are presented in Table 5.1.

Loss of livelihoods	The Project will impact on both physical and natural resources and related livelihoods. Several households will have permanent loss of livelihoods and household income due to the permanent land restrictions (safety zones) and resettlement. The Project may also cause changes in land values post construction in peri-urban and rural areas due to building restrictions. The biggest issue in AoI that enhances the vulnerability of the population is the rising prices, decline in agricultural production and income obtained from the trade of agricultural products due to the rapid urbanization of some districts.	Generally, few women own or inherit land in Turkey. According to the RAP survey, women in the AoI do have access to ownership of land, with most settlements having a majority of male owners/shareholders, except of Karaagac where there are more female landowners of privately-owned parcels than males. Women who lose their livelihood and are struggling to restore it to an equal level, risk becoming vulnerable to exploitation and abuse.	The Plans, Procedures and Policies below are implemented and followed efficiently to minimize and eliminate the risks and impacts. ✓ Resettlement Action Plan (RAP) ✓ Stakeholder Engagement Plan (SEP) ✓ Grievance Mechanism (GM) ✓ Livelihood Restoration Plan (LRP) *(under preparation)* Also, the implemented mitigation measures are presented in Table 5.1.

4.2 EQUAL OPPORTUNITIES IN THE PROJECT'S WORKFORCE AND PROCUREMENT PRACTICES

Even the opportunities for engaging women in construction workforce and suppliers during construction may be limited, 4% of the total workforce and 11% of the managerial position are held by women as of September 2025.

The operation phase offers more opportunities and provides a timeframe which allows for proper preparation of engagement and capacity building to enhance women's opportunities.

The Company, as responsible to manage, operate, maintain, and repair the Project components during the BOT contract period,

will engage an "Operations and Maintenance Contractor" to undertake the operational phase of the Project (this contract is not yet signed). The responsibilities of the O&M Contractor with respect to the maintenance and operation of the Project components, environmental protection and other relevant topics described in the ESIA will be a part of the master service contract between the Company and the O&M Contractor.

A number of measures are in place protecting women against discrimination and ensuring promotion of equal opportunities in the Company workforce and through procurement practices.

Issues regarding equal opportunities between men and women are mentioned in the General Rules of Employment of Project, prohibiting the discrimination in the process of hiring due to gender. The requirement is also cascaded down to the Contractor and subcontractors in accordance with EBRD requirements.

In order to limit disturbances related to the influx of outside workers into the Project area, Local Employment Plan is in place and implemented which ensures prioritizing the local workforce.

5 GENDER ACTION PLAN

The following Gender Action Plan (GAP) outlines actionable recommendations that are listed in the first version of the GAP, their current status as of September 2025, enhance gender equality and equal opportunities in Project implementation. Targets for each of the action items are set and committed by the Company. The GAP has allocated all responsibilities to the Company. Topics have been identified based on good practices for gender mainstreaming in infrastructure projects. The content draws on guidance notes from ADB[45] and EBRD[46] providing guidance on how gender mainstreaming can be put into practice and integrated into project implementation.

The Company identify relevant external stakeholders, including non-governmental organizations, informal groups, community leaders, women activists, external independent experts, private and public organizations and institutions, and engage and coordinate with them when necessary. The Company also identified and allocated human resources and budget for the implementation of the GAP within the project budget.

The SPV is responsible for the internal monitoring, evaluation and reporting of the implementation of the GAP. These activities will be carried out as part of the Environmental and Social Management System (ESMS) and in accordance with the ESAP reporting requirements. Progress on the implementation of the GAP will be reported through the quarterly/bi-annual ESAP progress reports. In addition, the SPV will undertake an internal evaluation of the implementation of the GAP at least annually.

Table 5.1: Gender Action Plan

c	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
1.	Enhance coordination and cooperation within the GAP	✓ 1.1 Define a position for a full-time employee responsible for the implementation and monitoring of GAP, and coordination with internal and external stakeholders. ✓ 1.2. Conclude recruitment process for the above-mentioned position. ✓ 1.3. Comprehensibly define the roles and responsibilities of the Gender Focal Points, including roles and responsibilities to	1.1-Implemented 1.2-Implemented 1.3-Implemented	1.1 A full-time, female Gender Focal Point (GFP) who is responsible for the implementation and monitoring of GAP has been employed by the Project on 05.08.2024. 1.2 GFP who is responsible for the implementation and monitoring of GAP has been employed by the Project on 05.08.2024. GFP is responsible for reporting implementations to Gender Lead and both	The Company/Contractor Financial resources for the GAP implementation. Financial resources for cooperation with external experts and stakeholders. Human Resources allocation (full time position responsible for the implementation of GAP).	Budget and human resources allocations monitoring. Human Resources Records. Records of cooperation.	Identification of relevant internal and external stakeholders. Definition and allocation of budget for GAP and external cooperation. At least 1 person hired full time internally responsible for GAP implementation, monitoring, and coordination with internal	Prior to construction	The Stakeholder Engagement Plan includes specific measures to ensure regular, open, and transparent communication with all stakeholders. During implementation, stakeholder engagement activities will continue to be carried out in accordance with the SEP requirements, and the effectiveness of communication channels will be regularly

									monitored. In the event that any gaps or additional stakeholder needs are identified, the SEP will be updated and/or additional engagement activities will be undertaken, as necessary .

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[45] ADB, 2013. Preparing a Project Gender Action Plan

[46] EBRD, 2011. Gender 1 – Urban rehabilitation and transport projects

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
		manage GBVH related issues. The focal point will keep the GBVH communication line including WhatsApp, open and accessible. Organizing women's focus group meetings, Informing external stakeholders Coordinating meetings and trainings together with the SPV (Social Gender Lead), when necessary. All these activities are monitored and reported to the SPV Gender Lead on a regular basis. ✓ 1.4. Identify external stakeholders (NGOs, informal groups, community leaders, women activists, external independent experts, private and public organizations, and institutions etc.) which can collaborate for specific actions as part of stakeholder engagement A stakeholder map has been developed (included in the SEP). ✓ 1.5. Define and allocate budget to each topic of the present GAP. ✓ 1.6. Define and allocate financial resources for cooperation with external experts and stakeholders.	1.4-Implemented 1.5-Implemented 1.6-Implemented	positions are dedicated in the organogram. 1.3 The roles and responsibilities of the GFP are defined in Section 8.4.3.2 of the SEP and in Table 10-1. Supporting evidence has been provided. 1.4 Stakeholder groups are defined in Table 3.3 of the SEP. Supporting evidence has been provided. 1.5 A budget has been defined and allocated for the action. Proof of documents is shared with IESC. Following the presentation of evidence documents and the evaluation of the documents, this item has been closed. 1.6 A budget has been defined and allocated for the action. Proof of documents is shared with IESC. Following the presentation of evidence documents and the evaluation of the documents, this item has been closed.			and external stakeholders. At least 3 working days per month spent by Project staff on establishing and maintaining cooperation with external stakeholders. Implementation.		

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
2.	Enhance awareness of women's opportunities on the Project	✓ 2.1. Establish a cooperation with existing initiatives for enhancing women's participation in technical sectors, such as the Engineer Girl of Türkiye programme and the Association of Construction and Women's (IVKAD) initiatives. ✓ 2.2. Prepare a communication strategy for raising awareness and sharing of success stories of female engineers or technical staff to enhance visibility of women's opportunities on the Project. ✓ 2.3. Define and allocate financial resources for communication strategy development and external communication.	2.1- Implemented 2.2- Implemented 2.3- Implemented	2.1 Mentorship activities (e.g., vocational school coaching, workshops) can be presented as evidence. Cooperation with initiatives should be documented through communication records, participation logs, or media coverage. It has been closed based on the submitted media documents to GBHV Consultant. 2.2 A short information note from the Holding on women-focused awareness and campaigns, items from the Sustainability Report are shared with GBHV Consultant. Rönesans Impact Workshops for Women have been organised to raise awareness. The company has provided media news as evidence. This item has been closed with the evidentiary documents mentioned. 2.3 A budget has been defined and allocated for the action. E&S Budget that includes GAP Budget is shared with and approved by IESC on January 2025.	The Company Financial resources Human resources	Budget and human resources allocations monitoring. Records of cooperation.	Communication Strategy developed. Awareness raising taking place. At least 2 communication items published annually.	Throughout Project life	

Gender Action Plan

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
3.	Promote recruitment of women	✓ 3.1. Define female targets for all employment opportunities generated by the Project during construction (e.g., percentage of women to be employed in civil works, engineering etc.), and during operation (toll collection staff, station attendees, ticket collectors, drivers, roadside repair, and maintenance). ✓ 3.2. The Company and EPC Contractor will work with local authorities (such as İŞKUR) and employment organisations to ensure that all temporary positions are advertised in a manner that is accessible to the communities in the AoI. ✓ 3.3. Conduct regular, open, and transparent communication with all stakeholders, as outlined in the Stakeholder Engagement Plan, in regard to employment opportunities. ✓ 3.4. Include a clear statement in job adverts that the Company is committed to addressing GBVH in all its operations. ✓ 3.5. The Company and EPC Contractor will ensure that the recruitment process (including EPC, subcontractors, and suppliers' recruitment process) is fair and transparent, public, and	3.1- Implemented 3.2- Implemented 3.3- Implemented and will be on-going 3.4- Implemented	3.1 Efforts have been made to meet requirements, but the 5% target remains challenging. Women and men are evaluated under the same recruitment standards. The company has prioritized woman who meet qualifications during employment process. 3.2 Job advertisement examples committed to international standards have been shared and the evidence documents regarding cooperation with local institutions have been provided. 3.3 In the last three months, 98 women-focused group discussions were conducted, engaging a total of 123 women. These meetings covered topics such as blasting, consultation, general project information, and RAP information. The submitted documents demonstrate that the necessary effort has been made in this regard. It will be monitored throughout the project life as part of stakeholder communication. 3.4. A fair, transparent, and non-discriminatory process is followed in job postings. Evidence Document has been shared with GBHV Consultant. This item has been closed with mentioned evidentiary documents.	The Company Financial resources Human resources	Number of women employees % of women in workforce Records of cooperation	In minimum 5 % of women employment expected to be achieved by the end of the project. 100 percent of job categories have established targets for female employment. 100% of temporary positions advertised in the AoI. Number of community meetings held to engage on employment opportunities. 100% of job adverts include GBVH statements. 5% of vulnerable persons who have been engaged on expected employment qualification. Minimum 5% of women employed during construction. Currently is 4,08% Gender - disaggregated employment register.	3.3 / 3.6 /3.8/ 3.9 Throughout project life	To support an increase in the women's employment rate, qualified female candidates will be prioritized for suitable positions. In cases where the target cannot be fully achieved due to the limited availability of qualified female candidates, additional measures to enhance women's participation in the workforce will be considered. If needed, activities to inform women about employment opportunities will be strengthened through mukhtars and local communication channels in areas with potential labour availability. Women's participation in recruitment processes will be monitored throughout the project implementation period, and additional corrective actions will be implemented where necessary.

		open to all regardless of ethnicity, religion, or gender. ✓ 3.6. The Company and EPC Contractor are committed to employing 5% of people from vulnerable groups (applicable for temporary employment) such as low-income households, refugees, young people, ethnic minorities. Women and men will be evaluated according to the same standards, and employment priority will be given to female employees if they meet the expected qualifications. ✓ 3.7. The Company and EPC Contractor will ensure that subcontractors develop the following specific measures to facilitate access to employment for vulnerable people, including women and youth: 3.7.1 Prioritise gender inclusion to ensure women are represented in the pool of candidates or workers. 3.7.2 Use inclusive vocabulary in job descriptions in order to encourage women to apply. 3.7.3 Collaborate with local unemployment agencies.	3.5-Implemented 3.6-Implemented and will be on-going 3.7-Implemented	3.5 Recruitment processes are conducted in the same manner for NBO-EPC and all subcontractors. Subcontractor Agreement, Labour Audit and WSP inspection have been shared as evidence documents with GBHV Consultant This item has been closed with mentioned evidentiary documents. 3.6 Efforts have been made to meet requirements, but the 5% target remains challenging. Women and men are evaluated under the same recruitment standards. The company has prioritized woman who meet qualifications during employment. 3.7 Job announcements have been shared through Mukhtars' offices and cooperation with İŞKUR has been evidenced. However, as this is a heavy construction project, women's participation is influenced by sector-specific conditions, cultural dynamics, and the relatively high socio-economic profile of nearby communities. In several settlements, women show limited interest in formal site-based employment. Because of that, the rate of woman's job applications is low. Despite this context, the Company actively supports and monitors women's employment through gender-disaggregated tracking, open recruitment channels, and institutional					

		✓ 3.8. To maximise capacity enhancement and transfer of knowledge to local contractors and their employees, the Company will develop formal training programs and formalise on-the-job trainings to the extent possible, including learning targets and performance monitoring. ✓ 3.9. Establish and maintain gender-disaggregated employment register to allow tracking progress over time.	3.8- Implemented and will be on-going 3.9- Implemented and will be on-going	cooperation. Setting a fixed quota is therefore not considered realistic at this stage; instead, the Project continues to promote equal opportunity and encourage women's participation where feasible. The activities are found to be adequate to close this item. 3.8. OHS, hygiene, and vocational skills trainings have been delivered under the Project, with women receiving hygiene certificates. Training logs have been shared with GBHV Consultant as evidence. The trainings will be provided throughout the Project implementation process. 3.9. HR has developed detailed personnel lists disaggregated by age, gender, and education level. This should continue throughout the Project.					

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
4.	Promoting women's competence and career development	✓ 4.1. Establish targets to ensure women's participation in any training provided by the Company.	4.1- Implemented and will be on-going	4.1 - All E&S trainings conducted under the Project, as well as certifications obtained, including hygiene certifications, have been provided as evidence and will continue to be provided throughout the Project	The Company Financial resources Human resources	Training Participants Lists Talent Program Content, Participation Lists, Feedback Forms Human Resources Records	At least 10% of women participation in trainings. 100% of women who should be promoted, according to the career map, are included in the process.	4.1 Throughout Project life	Women's participation in Company-provided trainings will be regularly monitored, and necessary actions will continue to be taken to maintain the established targets. Where areas for improvement are identified, additional measures will be considered to further support women's career development and advancement.
		✓ 4.2. Establish a women's talent program and provide them with mentorship from women in supervisory and management positions.	4.2- Implemented	4.2 A team of 20 Rönesans volunteer coaches joined the "Vocational High School Coaches Project" in collaboration with the Ministry of National Education and the Private Sector Volunteers Association. They mentored 90 female students at Küçükyalı Vocational and Technical High School, reaching 750 volunteer hours annually and supporting both capacity building and social skills development.					
		✓ 4.3. Establish targets for women in supervisory or management position.	4.3- Implemented	4.3 Women hold 11% of the managerial positions in the Project.					

5.	Promote women entrepreneurship and opportunities for women-led or owned SMEs	✓ 5.1. Conduct analysis of women entrepreneurs and women-led SMEs and identify entry points for their integration into the supply chain	5.1- Implemented	5.1 Procurement unit made a local screening for women entrepreneurships, The extremely limited number of women-owned businesses providing services in the sector poses a significant barrier to meeting this criterion. However currently, there are two suppliers managed by women, and there are also suppliers with a high proportion of female staff. Despite significant efforts by the SPV and EPC in this regard, it is not possible to meet the quota due to the reasons stated, and it has been deemed appropriate to close the matter based on the submitted documents.	The Company Financial resources Human resources	Analysis Results (2023) Records on cooperation Contracts	Prioritizing women entrepreneurs		Efforts required for these activities, which will continue throughout the construction and operation phases of the project, have been made / are being made, and these are considered sufficient to close them. However, in the event of any major issue specific to the topics, the necessary reporting will be carried out.
		✓ 5.2 Establish cooperation with Women Entrepreneurs Association of Türkiye (KAGIDER) to advance the integration of women-led SMEs in project procurement.	5.2- Implemented	5.2 - Email correspondence was initiated with the Women Entrepreneurs Association of Türkiye (KAGIDER) in order to establish cooperation, and meetings were held. However, the relevant institution stated that, within the scope of their mandate, they can only support projects that can be developed under the framework of social investment.					
		✓ 5.3. Engage with women entrepreneurs and women-led SMEs on opportunities for Project support contracts and fulfilment of requirements.	5.3- Implemented and will be on-going	5.3 The Procurement Unit has conducted a local screening for women-led enterprises. At present,				5.3 Throughout project life	

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
				two suppliers are managed by women, and additional suppliers employ a high proportion of female staff. Furthermore, email correspondence has been initiated with the Women Entrepreneurs Association of Türkiye (KAGIDER) to explore potential cooperation. These efforts can be considered both a result of the necessary efforts and a significant step toward the inclusion of women entrepreneurs and women-led SMEs in project support contracts and requirements.					
6,	Promote non-discrimination, and equal opportunity	✓ 6.1. Develop a policy to promote non-discrimination and equal opportunity. ✓ 6.2. State explicitly a commitment in the Human Resource policy that women and men are to be paid equally for work of same value, i.e. remuneration will be based on employee's skills, experience, responsibilities and other objectives, non-gender-related, factors. ✓ 6.3. Ensure that policies are clearly communicated and accessible to management, supervisors, and workers. ✓ 6.4. Train managers and supervisors in the application of the policies. Relevant policies have been developed and are being implemented.	6.1- Implemented 6.2- Implemented 6.3- Implemented 6.4- Implemented	Managers and supervisors to strengthen their capacity in applying the policies. Relevant training logs and photo documentation have been shared as evidence. The Company has already established and is implementing a structured framework to support the GBVH Policy at Project level. The Zero Tolerance Policy, Code of Conduct, and relevant HR and Ethics procedures are in force and visibly disseminated across project offices, camps, and construction sites. GBVH awareness materials and ethics hotline numbers are publicly displayed, and the ethics reporting channel remains active and accessible to all workers, including subcontractor personnel. In addition, CLOs and Gender Focal Points conduct regular meetings	The Company Financial resources Human resources	Training Participants Lists Human Resources Records Human Resource policy Non-discrimination and equal opportunity policy	Non-discrimination and equal opportunity policy developed. Human Resource policy updated. 100% of managers and supervisors trained.	Prior to Construction Throughout project life	It has been assessed that Rönesans Holding's existing policies meet the relevant requirements, and these policies will continue to be applied within the Project. If any gaps or areas for improvement will be identified during implementation, the necessary corrective actions will be identified and implemented.

				with female employees to strengthen awareness, accessibility, and trust in reporting pathways. The dedicated GBVH mechanism has been prepared in alignment with international standards (including EBRD PR2/PR4 and IFC PS2 requirements) and the internal approval process has already been completed, and the mechanism and policy will be put into implementation. However, in practice, key elements of the awareness-raising mechanism, reporting channels, focal point engagement, and response procedures, are already operational. On this basis, the existing documentation, dissemination practices, and active implementation are considered sufficient to close this item, subject to routine monitoring of continued application. Internal approval has been obtained. The GBVH Policy has been fully implemented, and refresher training was completed as of March 2026. GBVH framework is fully operational.					

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
7.	Ensure gender responsive protection for the labour force during Project implementation	✓ 7.1. Raise awareness on core labour standards (CLS) among contractors. ✓ 7.2. Include compliance with CLS in the bidding documents and contracts and as part of the induction training. ✓ 7.3. Ensure that contractors enforce CLS and the protection of labour rights and interests of employees, including equal pay for work of equal value between men and women. ✓ 7.4. Keep accurate records of number or percentage of men and women labour days and salary for skilled and unskilled labour.	7.1- Implemented 7.2- Implemented 7.3- Implemented 7.4- Implemented	7.1 Awareness on CLS has been ensured through the Project's E&S procedures, trainings and by including compliance clauses with international standards and company policies in subcontractor contracts. Contract provisions have been shared as evidence, and therefore the item can be considered closed 7.2 CLS has been integrated into bidding documents and contracts, and relevant clauses have been shared as evidence. In addition, CLS requirements are covered as part of the induction training for all workers. Therefore, this item can be considered closed. 7.3. Contract examples for both male and female employees of the company and the subcontractors in comparable positions (blue- and white-collar) have been shared as evidence. Therefore, this item can be considered closed. 7.4 Accurate records of male and female labour days and salary are maintained through attendance tracking, and salary payments are regularly monitored. In addition, independent external expertise has been engaged to monitor quarterly worker conditions. This item can be considered closed with the evidence provided through Labour Audit Report, along with the	The Company Financial resources Human resources	Training Participants Lists Human Resources Records Contracts with contractors Records of number or percentage of men and women labour days and salary Quarterly CLS monitoring Report Risk Assessment Reports	100% of bidding documents include CLS requirements. Quarterly reports on CLS monitoring. 100% of employees provided with information of hazards including violence and harassment within 3 months of employment for new staff / beginning of 2023 for existing staff.	Prior to construction Continuous	The relevant measures to ensure gender-responsive protection of the workforce have been implemented through the Project's labour management procedures, contractor requirements, training programs, and monitoring mechanisms. Contractor compliance, worker awareness, training activities, grievance mechanisms, and relevant labour indicators will be regularly reviewed and reported through established monitoring and audit processes. Where any gaps or areas requiring improvement are identified, appropriate corrective actions will be implemented.

				labour audit report made accessible to the lenders.					
		✓ 7.5. Monitor CLS enforcement monthly and reflect this information in the regular reporting.	7.5- Implemented	7.5 Monthly monitoring of CLS enforcement is carried out through induction trainings, which include relevant modules on labour rights, as well as during regular worker representative meetings. All trainings, information sessions, and records are tracked on a monthly basis, while compliance is further reviewed and reported through quarterly labour audits. Therefore, the item can be considered effectively addressed with ongoing monitoring and reporting mechanisms in place.					
		7.6 Apply a gender-sensitive approach to the risk assessment for specific work tasks and ensure that all female employees are provided with PPE that are appropriate for women's physiques.	7.6- Implemented	7.6 PPE is provided in sizes appropriate to employees' body measurements and shoe sizes, ensuring suitability for female workers. Evidence photos have been shared, and additional documentation can be presented following GBHV Consultant's 2nd monitoring report. No complaints have been raised by employees, indicating that the measure is effectively implemented. Therefore, the item can be considered addressed.					
		✓ 7.7 Identify and assess hazards and risks of violence and harassment with the participation of employees and their representatives	7.7- Implemented	7.7 GBVH Policy and Gender-Based Grievance Mechanism, which include provisions for identifying and assessing risks of violence and harassment with the participation of employees and their representatives, have been prepared. Please					

				see Progress **Assessment column 6.4 and 10.1.**					
		✓ 7.8 Provide employees with information on identified hazards and risks of violence and harassment and the associated prevention and protection measures, including on the rights and responsibilities of workers.	7.8- Implemented	7.8. All necessary information on identified hazards, risks of violence and harassment, and related prevention and protection measures have been provided through GBVH trainings. Updates and guidance are regularly shared with female employees during meetings and consultations. Workers are informed of their rights and responsibilities, including how to proceed in the event of a complaint. Training attendance forms, photos, and GBVH is integrated into the toolbox talks and orientation sessions, the content of the training may use as evidence.					
		✓ 7.9 Incorporate violence and harassment and associated psychosocial risks in the management of occupational health and safety.	7.9- Implemented	7.9. This item has been incorporated under the heading “Increased Risk of Gender-Based Violence and Harassment” in the Occupational Health and Safety Management Plan. In addition, the relevant provisions are covered in occupational training sessions within the scope of the Zero Tolerance Policy. Training content, attendance photos, and the revised OHS Management Plan have been provided as evidence. Therefore, the item can be considered closed.					

	Topic		Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
8.	Ensure gender-sensitive construction campsites	✓	8.1. The Company will apply the IFC/EBRD Guidance Note on Workers' Accommodation Processes and Standards. Furthermore, the Company will consider gender aspects at campsites. Separate gender accommodation to be provided, including lockable doors and windows, separate rest areas, well maintained lighting throughout the facilities and measure to avoid overcrowding and lack of privacy. *The IFC/EBRD Guidance Note* has been applied, and all designs have been carried out in	8.1- Implemented	8.1. The IFC/EBRD Guidance Note on Workers' Accommodation has already been applied, and all facility designs follow these standards (photographs of the campsite may be presented). Compliance is further ensured through regular monitoring by IESC and external labour consultant, with findings reported accordingly. In addition, subcontractor contracts include clauses requiring adherence to international standards and the Company's internal procedures. Sample contracts have been shared as supporting evidence. Therefore, this action can	The Company Financial resources Human resources	Risk Assessment Reports; H&S reports Contracts	12 sanitation facilities by gender compared to number of workers. 100% compliance by contractor and subcontractors	Throughout construction	Efforts required for these activities, which will continue throughout the construction and operation phases of the project, have been made / are being made, and these are considered sufficient to close them. However, in the event of any major issue specific to the topics, the necessary reporting will be carried out.

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
		accordance with these guidelines. ✓ 8.2. Separate sanitation facilities accommodating for specific needs of women, as well as separate bathrooms, changing room and toilet facilities with adequate privacy, including ceiling to floor partitions and lockable doors and windows will be provided in accommodation camp as well as on construction sites. ✓ 8.3. Above requirements will also be applicable for the EPC Contractor and subcontractors, and relevant clauses will be integrated into contracts to ensure compliance.	8.2- Implemented 8.3- Implemented	be considered sufficiently addressed. 8.2 The same evidence documents as above apply. Separate sanitation, bathroom, and toilet facilities with adequate privacy have been provided as required. Therefore, this item can be considered closed. 8.3 The requirements have also been made applicable for the EPC Contractor and subcontractors, and the relevant clauses on GBVH and gender sensitive approach have already been integrated into contracts to ensure compliance.					
9.	Ensure prevention of sexually transmitted diseases	✓ 9.1 Provide workers, including contractors and subcontractors, with health awareness training on prevention and treatment of STDs. ✓ 9.2 Explicitly prohibit sexual interaction of any kind with underage persons in the Code of Conduct.	9.1- Implemented and will be on-going 9.2- Implemented	9.1 STD has been incorporated into the orientation training to enhance employee awareness. The Company has provided the integrated training content for closure of this item, and the item has been closed accordingly. Orientation training and tool-box training will continue regularly throughout the project. The training content was shared with IESC. 9.2 For the Code of Conduct action item, the requirement has been addressed. Attached Evidence Document — kindly refer to page 9 of the Code of Conduct for verification. This evidence	The Company Financial resources Human resources	Training Participants Lists Code of Conduct	Training provided for 100% of workers by 3 months of employment	Prior to construction Throughout construction	Awareness trainings, Code of Conduct requirements, and health check-up practices related to the prevention of STDs will continue throughout the Project lifecycle. The relevant measures will be regularly monitored, and corrective actions and reporting will be undertaken in case any gaps or significant issues are identified.

				demonstrates the adoption and communication of the Code of Conduct, and the action can therefore be considered closed.					
		✓ 9.3 Provide regular medical check-up including STD testing for all workers.	9.3- Implemented and will be on-going	9.3. All employees, including contractors' employees, undergo a detailed health examination before starting work. Furthermore, all employees undergo periodic health checkups and follow-ups. Also, basic health education is being provided for all employees, but STD issue will be on a voluntary basis. Also, regular medical check-ups, including STD testing, have already implemented for REC employees free of charge.					

	Topic		Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
10.	Establish gender sensitive workers grievance mechanism	✓	10.1 Workers grievance mechanism will be accessible to all workers, whether permanent or temporary, directly or indirectly employed.	10.1- Implemented	10.1 The Project-level Grievance Mechanism (including GBVH-specific provisions) has been developed in line with international lender standards (EBRD PR2/PR4, IFC PS2 and GIIP) and the internal approval process has already been completed, and the mechanism and policy are currently being implemented. Grievance channels are active and accessible to workers, community Members and subcontractor personnel, with awareness materials (posters, hotline numbers, forms and focal point contacts) visibly displayed at site offices, camps and work areas. All contractors and subcontractors are informed of the procedures through inductions, toolbox talks and supervisory briefings. Grievances, both verbal and written, are recorded and tracked in gender-disaggregated logs. CLOs and Gender Focal Points support awareness and follow-up. Formal approval is provided and the mechanism is functionally in place and used at site level, and is therefore considered operational, subject to ongoing monitoring and verification. At this stage, the findings are sufficient to close this item.	The Company Financial resources Human resources	Relevant Grievance Mechanisms Review	Grievance mechanism available for all workers.	Prior to construction Throughout construction	The gender-sensitive workers' grievance mechanism has been established and is accessible to all workers, including contractors and subcontractors. The mechanism will continue to be monitored throughout the Project lifecycle, and any identified gaps or issues will be addressed through appropriate corrective actions and updates where necessary.

		✓ 10.2 Provide specific provisions to manage grievances related to GBVH. ✓ 10.3 The grievance mechanism will extend to contractor and subcontractor workforce.	10.2- Implemented 10.3- Implemented	10.2 Please see Project Assessment Column, 10.1. 10.3 Gender Based Grievance mechanism covers also contractors and subcontractors, and related commitments are integrated into the contracts with sub/contractors and employee contractors.					
11.	Implement policies on GBVH	✓ 11.1 Assign clear responsibility for the policy and ensure the policy includes the following: - 11.1.1. A statement that supervisors and managers have a duty to implement the policy and to demonstrate leadership by example. - 11.1.2. An engagement to	11.1- Implemented	11.1. All steps outlined under Section 11.1 have been completed. The Project has already established and implemented a Zero Tolerance Policy, a Gender-Based Grievance Mechanism, and a GBVH Policy. GBVH has been integrated into orientation trainings, toolbox talks, and dedicated stand-alone trainings to raise awareness and prevent workplace violence. Supervisors and managers are explicitly	The Company Financial resources Human resources	Independent Policy Review before its Adoption Review of Communication towards stakeholders and workers of the Policy Monitoring of Initiatives and its impacts	Policy developed and implemented Policy shared with all employees 5 awareness raising initiatives targeting employees by 2026.	Prior to construction Throughout construction	GBVH policies and related mechanisms have been established and implemented. Training, communication, and monitoring activities will continue throughout the Project lifecycle to ensure effective implementation of the policy, enhance worker awareness, and maintain management responsibilities. Should any gaps or areas for improvement be identified during

									implementation, the necessary corrective actions will be identified and implemented.

Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
	provide managers with the ability and the means necessary to carry out the policy at all levels within the organisation. - 11.1.3. An assignment of responsibility to individuals or teams with appropriate training and skills for the implementation of the policy. - 11.1.4. An engagement that workers refrain from any acts of workplace violence. Code of Conduct has been signed by the employer. - 11.1.5. Ensure that all work areas including transportation arrangements, accommodation, training facilities etc. are addressed in the policy. - 11.1.6 A statement that workers support and encourage employers in creating and implementing personnel policies and		tasked with ensuring implementation and demonstrating leadership by example, and responsibilities are assigned to qualified staff for policy execution. Workers have signed the Code of Conduct, committing to refrain from workplace violence, while all work areas, including transportation arrangements, accommodation, and training facilities, are addressed in the policy. In addition, workers are encouraged to support the company in implementing practices that prevent violence. The internal approval process is completed and the mechanism and Gender- Based Grievance Mechanism will be fully operationalised,further strengthening enforcement and compliance with international standards.					

Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
	practices that discourage workplace violence. ✓ 11.2. Communicate the policy to all employees and ensure commitment to follow and implement the policy in all aspects of work.	11.2-Implemented	11.2 The policy and related procedures have been prepared and are approved. **Please see Project Assessment Column, 6.4 and 10.1.**					
	✓ 11.3 Accompany the policy with initiatives to raise awareness among management, supervisor, employees, contractors, and suppliers on GBVH, non-discrimination and equal opportunities in everyday practice. Provide information on how they can report GBVH without any reprisals.	11.3-Implemented	11.3 All grievance channels are clearly identified in the Gender-Based Grievance Mechanism, ensuring safe, confidential, and non-retaliatory reporting of GBVH cases. Trainings on GBVH, non-discrimination, and equal opportunities are regularly provided to all employees and subcontractor staff, including both white- and blue-collar workers across the Project. GBVH awareness has also been integrated into toolbox talks, orientation trainings, and stand-alone sessions, ensuring that the policy is embedded into everyday practice and accessible to all workforce levels.					

12.	Implement code of conduct for employees and contractors that prohibits GBVH	✓ 12.1 Establish a code of conduct (CoC) for employees and contractors that explicitly prohibits GBVH. ✓ 12.2 Establish corrective measures for any breach of the CoC. ✓ 12.3 Communicate clearly to all employees and contractors. ✓ 12. 4 Include training on CoC and the prevention of GBVH in induction training for all staff.	12.1- Implemented 12.2- Implemented 12.3- Implemented 12.4- Implemented	12.1 Code of Conduct documents is prepared and guarantees GBVH prevention. 12.2 The Disciplinary Regulation is provided, and it has commitments to prohibit and prevent GBVH, while referencing Zero Tolerance Policy. This item has been closed based on mentioned evidentiary documents. 12.3 The Labour Audit document is presented as evidence including communication channels with employees and contractors. 12.4 CoC and GBVH is integrated into the toolboxes, orientation trainings and separate periodical employee trainings. This item has been closed based on mentioned evidentiary documents.	The Company Financial resources Human resources	Independent Code of Conduct and corrective measures Review before its Adoption Review of Communication towards stakeholders and workers of the Code of Conduct Training Participants Lists Annual Monitoring Report on adherence to CoC.	CoC prohibiting GBVH established. 100% of staff that have participated in induction training. 0 of violations of the CoC	Prior to construction Throughout construction	The ILO's Code of Practice on safety and health in construction 2022 could serve as a reference tool.

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
		✓ 12.5 Monitor adherence to the CoC.	12.5- Implemented	12.5 The monitoring process is undertaken and is ongoing through the Project implementation process. The existing documents have been found sufficient for closure; however, it will be monitored throughout the project.					
13.	Raise requirements on GBVH towards Contractors	✓ 13.1 Include clauses into Contractors' contracts committing them to adhere to Nakkaş Otoyol A.Ş. GBVH policies and procedures: These provisions have been included in subcontractor agreements, in which subcontractors commit to complying with the Equator Principles and the requirements of the lenders. ✓ 13.1.1. The contractor will develop policies and protocols for GBVH Policies and procedures have been developed, including those on the prevention of domestic violence, zero tolerance, and the Code of Conduct. ✓ 13.1.2. The contractor will develop a Code of Conduct including GBVH and provide all their workers with induction training on Code of Conduct, policies, and protocols. The relevant policy has been developed, integrated into training programs, and all personnel sign this document as part of the training.	13.1- Implemented 13.1.1- Implemented 13.1.2- Implemented	13. 1 The implementation of a gender-based approach and compliance with international standards by subcontractors have been included as commitments in the contracts and secured. The Stakeholder Engagement Plan document has been attached to the contracts as a reference document. This item has been closed based on mentioned evidentiary documents. 13.1.1 Gender-based Grievance Mechanism and GBVH Policy has been produced with commitments including prevention of domestic violence, zero tolerance, and the Code of Conduct. This item has been closed based on mentioned evidentiary documents. 13.1.3. GBVH trainings have commenced, and so far, 955 personnel have received this training. The relevant policy and mechanism is integrated into the trainings. GBVH is included the orientation training for newly hired employees and toolboxes. Training logs and photos are shared. This item has been closed based on mentioned evidentiary documents. GBVH trainings have commenced, and so far, 955 personnel have received this training. All newly hired personnel are provided with this training as well. The contractor applies a zero-	The Company Financial resources Human resources	Contracts Procurement Records	100% of contracts including clauses related to GBVH.	Prior to construction Throughout construction	GBVH requirements have been incorporated into contractor agreements, and compliance of contractors and subcontractors with relevant policies, procedures, and the Code of Conduct will be monitored throughout the Project lifecycle. Training, grievance mechanisms, and reporting processes will continue, and corrective actions will be implemented where any gaps are identified.

		✓ 13.1.3. The contractor will deliver periodic mandatory training on GBVH to all their workers, including subcontractors and core suppliers. ✓ 13.1.4. The contractor will apply a zero-tolerance policy to GBVH, and disciplinary actions are to be clearly stated in the Code of Conduct to be signed by their workers. The Code of Conduct is signed by all personnel upon starting their employment. ✓ 13.1.5. The contractor will put in place a grievance mechanism tailored to the needs of different groups (workers and communities) ensuring safe and confidential channels for raising reports of GBVH, including the possibility of raising grievances anonymously ✓ 13.1.6. The contractor will put in place a protocol for responding to GBVH reports.	13.1.3- Implemented 13.1.4- Implemented 13.1.5- Implemented 13.1.6- Implemented	tolerance policy to GBVH, and disciplinary actions, however the contracts of the employees should be included the Code of Conduct to receive employees official approval. The Code of Conduct has not been directly attached to the contracts as an appendix; however, as proof documentation, the core principles of code of conduct and disciplinary measures, and which has been integrated into the contracts, has been shared. 13.1.5 Gender-based Grievance Mechanism is presented anonymous and safe channels to receive grievances, and the Company has Ethic Hotline to protect confidentiality. This item has been closed based on mentioned evidentiary documents. 13.1.6.GBVH-related requirements are addressed through the existing Code of Conduct, Zero Tolerance and HR policies, existing structured grievance mechanism and contractual obligations requiring contractors and subcontractors to comply with the main contractor's management plans and policies. Although the GBVH Policy and grievance mechanism have not yet been implemented, the contractual framework ensures future compliance. Therefore, the action is considered adequately addressed at this stage. Please see Project Assessment Column, 10.1 13.2. An independent GBVH Consultant (IESC/RINA) is appointed and conducts regular monitoring, including monthly site visits and GBVH-focused supervision. GBVH-related findings, indicators and case					

		✓ 13.2 The contractor will include GBVH reports and other KPIs related to GBVH in its regular reporting.	13.2-Implemented	monitoring are systematically covered in the independent Given that GBVH reporting is already ensured through independent expert monitoring, assigning parallel reporting responsibility to the EPC Contractor would create duplication and practical time-management constraints. The EPC may incorporate the GBVH Consultant's reports into its periodic reporting as an appendix where relevant.					
14.	Train security personnel and other personnel engaging with communities	✓ 14.1 Provide enhanced training on the CoC, risk and prevention of GBVH to all personnel engaging with communities, including: ✓ 14.1.1. Security personnel. Personnel involved in the decisions-making and engagement relating to resettlement, compensation, and livelihood restoration. Personnel involved in the community engagement process and grievance management, including the Project CLOs. ✓ 14.2 Training will provide clear instruction on the expectations towards workers conduct, including respecting the local communities and vulnerable population, human rights and GBVH risks and how these can be prevented. The training will provide specific guidance on zero-tolerance of abusive behaviour and consequences of such behavior, including corrective measures that will be taken.	14.1-Implemented 14.1.1-Implemented 14.2-Implemented	14.1 GBVH trainings have commenced, and so far, 955 personnel have received this training. All newly hired personnel will be provided with this training as well. 14.1.1 Security personnel and staff involved in RAP activities have completed the GBVH training. As of March 2026, refresher training has been provided to security personnel working on the project as well as all female staff. 14.2 GBVH trainings have been provided for employees. The relevant policy and mechanism are integrated into the trainings. GBVH has included the orientation training for newly hired employees and toolboxes. Training logs and photos has been shared with GBHV Consultant.	The Company Financial resources Human resources	Training Participants Lists CVs of Trainers Content Extract of Trainings	100% of staff in contact wit h community members who have received training by 1 month of employment for new employees / by 2023 for existing ones.	14.1, 14.2, 14.3 Prior to construction Throughout construction	Training on GBVH, the Code of Conduct (CoC), human rights, and community engagement has been provided to relevant personnel and will continue throughout the Project lifecycle for new employees and personnel in relevant roles. Training implementation and awareness levels will be regularly monitored, and additional training will be provided where necessary.

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
15.	Establish well-functioning protocols and remedial actions for GBVH survivors	✓ 15.1 Establish a grievance mechanism tailored to the needs of different groups (workers and communities) ensuring safe and confidential channels for raising reports of GBVH, including the possibility of raising grievances anonymously.	15.1-Implemented	15.1 GBVH grievance mechanism has been developed and approved, and the process has been completed with implementation. The Ethic Line is presented as anonymous grievance channel. Please see Project Assessment Column, 10.1	The Company Financial resources Human resources	Review of Grievance Mechanisms Training Participants Lists CVs of Trainers Content Extract of Trainings	Protocol and Grievance Mechanisms By the end of each reporting period, all GBVH-related grievances are confidentially recorded, addressed within set timelines, and reported with disaggregated data and trend analysis 100% of reports of GBVH which have been investigated within a reasonable timeframe.	Prior to construction Throughout construction	
		✓ 15.2 Establish a clear protocol for receiving, registering, investigating, and tracking reports of GBVH.	15.2-Implemented	15.2 GBVH grievance mechanism has been developed and approved, and the process has been completed with implementation. Please see Project Assessment Column, 10.1					
		✓ 15.3. Ensure that responsible people for investigating GBVH reports receive specialist training to conduct investigations safely. Procedures should be survivor centered and adaptable to the needs and wishes of individual survivors. Therefor both female and male investigators should be trained to accommodate for individual preference of survivors.	15.3-Implemented	15.3 GBVH trainings are provided for the employees. GBVH has been included in the toolbox and orientation trainings. The evidence documents are presented.					
		15.4 Design grievance mechanism and investigation procedures that are aligned with the national legal framework, as cases may have legal implication. To this end legal advice may be necessary.	15.4-Implemented	15.4 Gender-based grievance mechanism is prepared, approved and has been implemented. Please see Project Assessment Column, 10.1					

Topic		Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
16.	Provision of support system for survivors	✓ 16.1 Develop a documented GBVH Service Mapping and Referral Information Sheet identifying publicly available health, psychological, legal and social support services (e.g. public hospitals, ALO 183 Social Support Line, District Social Services Directorate, Gender Focal Points contacts etc.) and integrate this information into the Project's GBVH Procedure and induction materials. This contact sheet shall be provided to GBVH Focal Points and made available upon request to workers, rather than publicly displayed in high-visibility areas to protect confidentiality. ✓ 16.2 Engage with specialised civil society organisations for investigation of escalated cases and assist survivors with treatment and care, and to take legal actions against their perpetrator.	16.1- Implemented and will be ongoing 16.2- Implemented	16.1 The institutional contact information has been provided in Article 14 of the Emergency Preparedness and Response Plan, Given the public-sector structure in Türkiye, formal partnership protocols with public hospitals are not considered necessary or proportionate for this Project. Instead, a structured and periodically updated Service Mapping document is prepared, listing available public support mechanisms and emergency contacts. The service mapping, including local and general service providers, their contact details, and proximity to the Project area, was prepared and disclosed to workers through the information boards located in various common-use areas within the Project site. Visual evidence demonstrating the dissemination of this information in different shared areas was provided to the IESC for review. 16.2 Engagement evidence such as emails, meeting notes are presented.	The Company Financial resources Human resources	Service Mapping document Induction material reference	High quality support services providers accessible to workers and community members	16.2 Prior to construction Throughout construction	Efforts required for these activities, which will continue throughout the construction and operation phases of the project, have been made / are being made, and these are considered sufficient to close them. However, in the event of any major issue specific to the topics, the necessary reporting will be carried out.

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
17.	Establish mechanism for active community engagement to educate and raise awareness on GBVH	✓ 17.1 Conduct awareness raising among communities on the behaviours they can expect and not to expect from Project workers. Provide clear messaging on what GBVH is, the ways to report it and how reports will be handled. ✓ 17.2 Disseminate contact information and details on the available and accessible grievance channels and contact people to raise GBVH related cases in a confidential manner.	17.1- Implemented 17.2- Implemented	17.1 The item is closed by confirming that existing measures including mandatory worker induction covering Code of Conduct and GBVH, regular engagement with Mukhtars and active dissemination of grievance mechanism information, are sufficient to ensure that expected worker behaviours are clearly communicated to communities and that reporting channels are functional and accessible. 17.2 Gender-based Grievance Mechanism is prepared and approved to be implemented. The necessary anonymous channels are identified. The Ethic Hotline is provided as main channel, and the related information is also presented with posters on the walls.	The Company Financial resources Human resources	Awareness Raising Initiatives Reports	Disseminate project information, provide GBVH trainings, keep training logs	Prior to construction Throughout construction	Community awareness-raising and information activities on GBVH have been implemented and will continue throughout the Project lifecycle. Grievance mechanisms and confidential reporting channels will remain accessible, and the effectiveness of these communication channels will be regularly monitored. Additional actions will be implemented where any needs or gaps are identified.

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
18.	Utility disruption	✓ 18.1 Provide affected households with information on planned disruptions, for women or vulnerable people to plan their activities and consumption accordingly. ✓ 18.2 When unplanned disruption occurs inform to the extent possible households on the duration of disruptions.	18.1- Implemented 18.2- Implemented	18.1 Necessary information for the affected households is regularly provided through WhatsApp groups established together with the mukhtar's office and residents of the neighbourhoods/sites. This process will continue throughout the Project lifecycle. As the process is currently being implemented effectively and in line with Project requirements, this action is considered sufficiently addressed and can be closed. 18.2 Necessary information for the affected households is regularly provided through WhatsApp groups established together with the mukhtar's office and residents of the neighbourhoods/sites. This process will continue throughout the Project lifecycle. As the process is currently being implemented effectively and in line with Project requirements, this action is considered sufficiently addressed and can be closed.	The Company Financial resources Human resources	Disruption report /list of disruptions, category: planned or unplanned, date and time of disruption, and date, time and channel alert was sent.	Percentage 100% of planned disruption timely communicated to affected households at least one week before the disruption.	18.1, 18.2 Prior to construction Throughout construction	Information on planned and unplanned utility disruptions is communicated to affected households through WhatsApp groups established with mukhtars and neighbourhood / site residents, as well as other targeted communication channels. This practice will continue throughout the Project lifecycle; the effectiveness of the communication process will be regularly monitored, and additional measures will be taken where necessary.
19.	Traffic management	19 Conduct gender responsive mobility assessment to understand any particular mobility patterns of women or vulnerable people that will be considered in	19- Implemented	19. Community Health and Safety Management Plan (CHSMP) and Traffic Management Plan (TMP). Measures to address the mobility patterns of women and vulnerable groups have been	The Company Financial resources Human resources	gender responsive mobility assessment	Completed gender responsive mobility assessment	19.1 Prior to construction Throughout construction	Mitigation measures will be implemented if any gaps or areas for improvement are identified during monitoring.

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
		choosing travel routes for construction materials etc. or specific measures that will be implemented to mitigate disproportionate impacts during construction.		planned, are being implemented during construction, and are subject to regular monitoring. The need for a dedicated gender-responsive mobility assessment was reviewed against current Project practices. The external grievance mechanism is active and functioning effectively, with grievance logs demonstrating timely closure of complaints. Proof of evidence confirms that blasting schedules, road closures and other disturbance-related activities are systematically communicated in advance through information meetings and community notices. Coordination with mukhtars is regularly maintained, and blasting is postponed during nationally significant periods (e.g. examination dates) as a good practice measure. These measures indicate that mobility- and access-related concerns are already being proactively managed through stakeholder engagement and grievance management processes. On this basis, the proposed action is considered addressed, and the item is therefore closed, subject to continued monitoring					

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
20.	Project design	✓ 20.1 Use the gender responsive mobility assessment to inform the design of feeder roads, underpasses/overpasses to avoid any severance.	20.1- Implemented	20.1 Community Health and Safety Management Plan (CHSMP) and Traffic Management Plan (TMP). Measures to address the mobility patterns of women and vulnerable groups have been planned, are being implemented during construction, and are subject to regular monitoring. The need for a dedicated gender-responsive mobility assessment was reviewed against current Project practices. The external grievance mechanism is active and functioning effectively, with grievance logs demonstrating timely closure of complaints. Proof of evidence confirms that blasting schedules, road closures and other disturbance-related activities are systematically communicated in advance through information meetings and community notices. Coordination with mukhtars are regularly maintained, and blasting is postponed during nationally significant periods (e.g. examination dates) as a good practice measure. These measures indicate that mobility- and access-related concerns are already being proactively managed through stakeholder engagement and grievance management processes. On this basis, the	The Company Financial resources Human resources	gender responsive mobility assessment and follow up on findings	Adequate lightning established around project sites, service areas, underpasses and rest rooms. Separate, lockable restrooms and breastfeeding rooms are established at service stations/rest areas.	Prior to construction	

		✓ 20.2. Establish lightening around project sites, service area, underpasses serving as pedestrian crossing and rest rooms to enhance the personal safety of women. ✓ 20.3. Install separate, lockable restrooms and breastfeeding rooms for women at the service stations/rest areas.	20.2- Implemented 20.3- Implemented	proposed action is considered addressed, and the item is therefore closed, subject to continued monitoring through existing mechanisms. 20.2 The evidence documents submitted, especially the marked section in the Conclusion and Recommendation part, are sufficient to close this item. 20.3 Evidence can also include personal protective products placed in women's restrooms and photos of women's lockable lockers. The evidence is provided. Since the evidence and studies presented demonstrate that the relevant item has been adequately addressed and implemented, it has been deemed sufficient for the item to be closed.					

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
21.	Resettlement and Livelihood restoration	✓ 21.1. Specific attention will be paid to women and vulnerable people during dissemination of information, consultation, negotiation and post-resettlement monitoring processes through development and implementation of special information and consultation methods and tools designed to address the needs of each vulnerable PAP.	21.1- Implemented	21.1. As part of open day events, an accessible vehicle and an ambulance were rented to ensure participation, with a paramedic present during the events. In addition, a number of random household visits were conducted to provide information to women who could not attend the meetings. During focus group discussions, women and persons with disabilities (were present) were also visited in their homes and provided with information. The evidence of these activities are provided. This action is considered sufficiently addressed and can be closed.	The Company Financial resources Human resources	Quarterly Monitoring Reports	100% of the applicable women receiving livelihood restoration and/or compensation.	Prior to construction	Gender-responsive measures have been implemented throughout the resettlement and livelihood restoration processes. The participation and eligibility of women and vulnerable groups will continue to be monitored, and follow-up actions will be taken if any gaps are identified.
		✓ 21.2. Ensure that women without titles to the land they occupy are considered eligible for compensation.	21.2- Implemented	21.2. Women without formal land titles are considered within RAP/LRP eligibility criteria through gender-disaggregated monitoring. Priority is given to female-headed and land-using households, and evidence can be provided through gender-disaggregated entitlement lists, surveys, and stakeholder engagement records. This action is considered sufficiently addressed and can be closed.					

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
		✓ 21.3. Consider women's role in the informal labour market, including the agricultural sector, when assessing appropriate compensation for economic displacement. ✓ ✓ 21.4. Ensure that women have equal access to livelihood restoration in terms of skills training and employment opportunities enabling them to improve their economic status on equal terms. ✓ 21.5 Provide vulnerable groups, including women with multiple vulnerabilities with targeted in-kind assistance, and measures, which will be designed through direct engagement with the affected households in consideration of their special needs, including: - Assistance to access consultancy services and livelihood restoration initiatives. - Assistance to accessing compensation payments. - Assistance in accessing governmental institutions related to the resettlement process	21.3- Implemented 21.4- Implemented 21.5- Implemented	21.3 The results and actions of the sensitivity analysis study are shared. 21.4. The results and actions of the sensitivity analysis study are shared. 21.5. The results and actions of the sensitivity analysis study are shared. Sensitivity analysis has been conducted, the plan has been improved, and in this context, support has begun to be provided. The relevant evidence documents shared have been deemed sufficient for the closure of this item.					

	Topic		Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
			Assist illiterate, elderly, and other persons in need in reviewing and processing official documents relevant to expropriation. 21.6 Priority for job opportunities to one of the household members eligible and able to work and meeting the Project's employment requirements.	21.6-Implemented	21.6. The company gives priority to local recruitment. Employment data from project-affected areas is provided as evidence.					
22.	Close monitoring of female headed household's livelihood restoration	✓	22.1 Specific attention will be paid to monitoring of female headed household's livelihood restoration to ensure that livelihoods are fully restored.	22.1-Implemented	22.1. The results and actions of the Sensitivity Analysis Study are shared with Independent Consultant and it was approved by Lender Advisor. Consultancy work has been initiated for the development of the LRP, and LRP support has begun to be provided based on the field studies conducted. Female users within this scope are also benefiting from these supports / have been benefiting from these supports	The Company Financial resources Human resources	Quarterly Monitoring Reports	100% of applicable female headed households with livelihoods fully restored.	Prior to construction	
		✓	22.2 In case of livelihoods not restored to former levels, additional measures will be identified and implemented.	22.2-Implemented	22.2 The results and actions of the Sensitivity Analysis Study are shared with Independent Consultant and it was approved by Lender Advisor.Consultancy work has been initiated for the development of the LRP, and LRP support has begun to be provided based on the field studies conducted. Female users within this scope are also benefiting from these supports / have been benefiting from these supports					

23.	Ensure social and gender inclusion in community participation during project implementation	✓ 23.1. Encourage participation of local communities including women in consultation during the project implementation ✓ 23.2. Record women participation in terms of numbers, percentage, and how their suggestions and concerns have been addressed. ✓ 23.3. ESIA disclosure package including ESIA, NTS, RAP-LRP, SEP, Grievance Mechanism, Project leaflet and information postcards, and other documentation to be made publicly available. Consider venues accessibility to women and making the documentation available in public places frequented by women.	23.1- Implemented 23.2- Implemented 23.3- Implemented	23.1 Stakeholder engagement records are maintained with gender-disaggregated data and can be presented as evidence to demonstrate women's participation during project implementation, but the proof of documents are sufficient to close this item. 23.2. Women's participation is already being recorded in terms of numbers, percentages, and follow-up actions. This practice should be continued throughout the Project to ensure consistent monitoring and responsiveness, but the proof of documents are sufficient to close this item. 23.3 The ESIA disclosure package, including ESIA, NTS, RAP-LRP, SEP, Grievance Mechanism, Project leaflet, information postcards, and other documentation, has been publicly disclosed. Venues accessible to women were considered, and documentation was made available in public places frequented by women. This practice should be continued throughout the Project, but the proof of documents are sufficient to close this item.	The Company Financial resources Human resources	Quarterly Monitoring Reports	At least 30% of female participants in public meetings. ESIA disclosure package distributed to venues accessible to women and public places. At least 30% of women invitees participating in public meetings.	Prior to construction Throughout construction	Gender-inclusive stakeholder engagement measures have been implemented, including monitoring of women's participation and recording feedback received during consultations. Existing stakeholder engagement and monitoring mechanisms will continue to be used to assess participation levels and address any identified gaps.

Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
	✓ 23.4. Plan consultation meeting to accommodate for women's time restraints caused by e.g., their care duty, and considering the accessibility of the venue. If necessary, conduct separate meetings for men and women from nearby communities.	23.4- Implemented	23.4 These engagement meetings should be continued, but the proof of documents are sufficient to close this item.			1 women focus group discussion (FGD) per community.		
	✓ 23.5 Adopt the same approach as above for any ad hoc discussion meetings that may be initiated during project implementation.	23.5- Implemented	23.5 These engagement meetings should be continued, but the proof of documents are sufficient to close this item.					
	✓ 23.6 Establish CLO roles and recruit both male and female CLO, Recruited both male and female CLO.	23.6- Implemented	23.6 SEP is adequate to define roles and responsibilities, male and female CLO are recruited to close and the updated organizational chart is provided as evidence.					
	✓ 23.7 CLO to receive training on engagement with women especially considering gender-sensitive issues.	23.7- Implemented	23.7 As an ongoing process, GBVH training has been provided to employees including Gender Lead and CLOs by the independent GBVH Consultant					

	Topic	Action	Status	Progress Assessment	Responsibility and Resources	Monitoring	Target Indicator	Timetable	Additional remarks
24.	Establish gender-sensitive grievance mechanism	✓ 24.1 Provide a separate female contact point for complaints from women. ✓ 24.1.1 Establish and maintain gender-disaggregated grievance register. A separate database should be maintained by the Project to monitor such grievances. ✓ 24.1.2. Implement grievance mechanism channels developed specifically to manage concerns regarding the RAP and LRP processes. Consider specific needs of female headed households and women depending dependent on land-based livelihoods that does not hold the title to the land they occupy. ✓ 24.1.3. Carry out community feedback surveys in order to solicit feedback from the women PAPs annually.	24.1-Implemented 24.1.1-Implemented 24.1.2-Implemented 24.1.3-Implemented	24.1 Gender Focal Point is hired, and the scope of work is presented as evidence. 24.1.1. Gender disaggregated data are recorded. Additionally, complaints within the scope of GBVH are recorded in a log. It will be monitored throughout the project, and the current efforts have been assessed as sufficient for closure 24.1.2 Dedicated complaint logging systems for these processes have been developed and put into operation. It will be monitored throughout the project, and the current efforts have been assessed as sufficient for closure 24.1.3. This item is closed by now according to the - the results of the grievance logs on a monthly basis, and common trends, but if a trend with grievance return a need to re-open this action this will be reported.	The Company Financial resources Human resources		Average time for resolving grievance less than 4 weeks after the grievance is received. 85% of women satisfied with grievance resolution.	Prior to construction Throughout construction	A gender-sensitive grievance mechanism has been established, including a female contact point and gender-disaggregated grievance records. The objective of the mechanism is not to increase the number of grievances received, but to ensure that women can raise concerns and grievances through a safe and accessible channel when needed. The effectiveness of the mechanism and grievance trends will continue to be monitored through existing processes, and appropriate improvement actions will be considered if any gaps or new needs are identified.