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MULTIPLE LENDERS

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Nakkaş-Başakşehir Motorway Project



FINAL
JULY 2024

CONFIDENTIAL

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Nakkaş-Başakşehir Motorway Project

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QUALITY CONTROL

Issue/Rev	Revision 1	Revision 2	Revision 3	Revision 4	Revision 5	Revision 6	Revision 7
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Prepared by	Burcu Ergin Liz Watts Scott Beaton	Burcu Ergin Liz Watts Scott Beaton	Burcu Ergin Liz Watts Scott Beaton	Burcu Ergin Liz Watts Scott Beaton	Burcu Ergin	Burcu Ergin	Burcu Ergin
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CONTENTS

. ENVIRONMENTAL AND SOCIAL ACTION PLAN

No	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
PS1/PR1	**Assessment and Management of Environmental and Social Impacts and Issues**					
1.1	Prepare monitoring reports from the signing date of loan agreement that include the status of ESAP implementation, and compliance with lenders' requirements in a timely manner. The frequency of reports will be as follows: a) SPV's Bi-annual E&S Reports to the Lenders throughout construction and annual E&S reports during operations phase until the end of loan as per CTA. b) EPC's Quarterly Construction Status Update Reports to the Lenders c) Monthly Internal and Quarterly External RAP Monitoring Reports until independent RAP Completion Audit confirms satisfactory implementation of RAP.	Management of EHSS risks in accordance with National, EU Lenders' requirements.	EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principles 9 and 10.	Nakkaş Otoyol A.Ş (SPV) with the inputs of EPC and KGM	a) Bi-annual throughout construction and annual during operation by SPV b) Throughout construction by EPC c) Until RAP completion audit confirms satisfactory implementation of the RAP.	SPV's Bi-annual E&S Reports during construction. SPV's Annual E&S Reports during operation. EPC's Quarterly construction update reports throughout the construction phase. Monthly Internal and Quarterly External RAP monitoring reports (until RAP completion audit confirms satisfactory completion of RAP).
1.2	***EPC's Internal Monthly E&S Reports*** Review and monitor monthly progress update reports of EPC.	Management of EHSS risks in accordance with National, EU and the Lenders' requirements.	EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principles 9 and 10.	SPV EPC to prepare Project E&S Reports for issue to the SPV.	Throughout construction.	EPC's Monthly E&S Reports and comments to include remedial actions (if any).
1.3	***Independent Environmental and Social Consultant (IESC) Monitoring and Reporting*** Facilitate the assigned Independent Environmental and Social Consultant (IESC)'s EHSS monitoring visits at site to verify the compliance of Project with Lenders' requirements. The IESC's monitoring and reporting will include: ▪ **Construction Phase:** Quarterly EHSS performance site visits and monitoring reports on implementation of ESMMP/CESMP and supportive E&S management Plans and construction progress to Lenders; and ▪ **Operation Phase:** Bi-annual EHSS performance monitoring site visits and reports on Operation Environmental and Social Management Plan (OESMP) implementation minimum two years of the operation to Lenders, the frequency and need for such independent monitoring to be reviewed and reduced as agreed with the Lenders thereafter.	Management of EHSS risks in accordance with National, EU and lender's requirements.	EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principles 9 and 10.	SPV to facilitate monitoring site visits. IESC to monitor and report project progress against EHSS requirements.	Quarterly throughout construction Bi-annual during operation (for first 2 years).	Quarterly E&S Monitoring Reports to be prepared and submitted to the Lenders by IESC following each site visit during construction and bi-annual during first two years of operation. The frequency and need for such independent monitoring to be reviewed and reduced as agreed with the Lenders thereafter.
1.4	***Construction Phase-Environmental and Social Management System (ESMS)*** Develop and implement an overarching Project Environmental and Social Management System (ESMS) appropriate for the scale and complexity of the Project and aligned with the Lenders' requirements during construction phase. The ESMS will be reviewed and updated on an annual basis, as a minimum or more frequent when significant Project and/or legislative changes occur. Any E&S documents with material changes will be redisclosed.	Optimisation of EHSS management through a formalised system. Mitigation of site-specific E&S risks and impacts.	EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principle 4.	SPV	Annual review of ESMS with initial review starting September 2024	Any updates in ESMMP, CESMP and relevant management plans. ISO 9001, ISO 14001, and ISO 45001 certificates of SPV and EPC

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	Key documents of the Project ESMS will include a minimum of Company policies, E&S management plans and procedures specified in the ESMMP and ESIA. SPV to ensure the EPC also develops and implements an ESMS in line with the Project requirements.					
1.5	***Operation Phase Environmental and Social Management System*** Develop and implement an OESMP and relevant management plans to cover the Project's operational phase in line with the ESIA and national requirements and update the ESMS based on the operational management plans and procedures. The operational management plans to be submitted and approved by Lender's minimum 3 months prior to operation. Review and monitor quarterly E&S progress update reports from O&M Contractor on implementation of operation phase E&S documents in the first two years of operations. The frequency and need for Quarterly reporting to be reviewed and reduced as agreed with the Lenders thereafter.	Optimisation of EHSS management through a formalised system.	EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principle 4.	SPV to oversee and monitor Operation and Maintenance (O&M) Contractor develop, implement and report	OESMP prepared 3 months prior to operation. Quarterly E&S monitoring reports by O&M contractor to be submitted 3 months into operation.	OESMP and relevant management plans to be approved by Lenders prior to operations. Operation Phase ESMS Quarterly E&S Monitoring reports by O&M contractor
1.6	***Environmental and Construction Permits*** a) Ensure necessary environmental and construction permits, including those that are required to be renewed are obtained. If there are any design changes, ensure permits are amended or new ones obtained, if necessary (See ESAP Action 1.10 below). b) Obtain operational permits (if required) c) Maintain a permits register during lifetime of the project	Compliance with the Republic of Turkiye regulatory requirements.	EBRD PR1 and PR4, IFC PS1 and PS4 and EP4 Principle 3.	SPV to oversee EPC and O&M Contractor to obtain and renew permits and maintain a permit register	a) Prior to commencing the activities for which permits are required. b) Prior to operation. c) Throughout construction and operation.	Environmental and social construction and operations permits register. .
1.7	***Environmental and Social Impact Assessment and Management*** a) Conduct E&S baseline and impact assessment submit it to lenders for their review and approval in the event of any material design or route change or associated facilities become part of the Project. b) Oversee and update Environmental and Social Management Plans and procedures accordingly to include any design or route change, and Project associated facilities, if required.	Mitigation of EHSS risks and impacts related to associated facilities.	EBRD PR1, IFC PS1 and EP4 Principle 2.	SPV to prepare E&S assessment report in line with the Management Change Procedure and oversee EPC to update Management Plans EPC to update Management Plans	a) Lender approved version prepared 1 month prior to the construction/use of identified potential associated facilities. b) Lender approved version prepared 1 month prior to the construction/use of identified potential associated facilities.	Supplementary EHSS assessment and/or ESIA of any Project associated facilities approved by Lenders. Revised management plans to cover Project associated facilities approved by Lenders.
1.8	***Environmental and Social Management Plans for Construction*** a) Implement the following construction phase management plans in line with the Lenders' requirements and update them when necessary: ▪ Environmental and Social Management and Monitoring Plan (ESMMP); ▪ Stakeholder Engagement Plan (SEP); ▪ Gender Action Plan (GAP); ▪ Resettlement Action Plan (RAP); ▪ Biodiversity Action Plan (BAP); ▪ Contractor Management Plan; and ▪ Environmental and Social Action Plan (ESAP) b) SPV to ensure EPC implements and monitors construction phase management plans specified in the ESMMP including but not limited to: ▪ Air Quality and Emission Control Plan	Optimisation of EHSS management through a formalised system.	EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principle 2 and 4.	a) SPV to implement and update when necessary. b) EPC to implement and monitor. c) SPV to develop d) SPV to oversee, EPC to develop, implement and monitor.	a) EPC throughout construction. b) SPV throughout construction. c) SPV to submit prior to signing of loan agreement. d) Prior to recommencement of construction works.	IESC Quarterly Construction Monitoring Reports. SPV's bi-annual E&S Reports as per ESAP action 1.1. EPC's monthly E&S Reports to SPV including progress update on KPIs in each Management Plan and in ESMMP. Community Development Plan

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	▪ Blasting Management Plan ▪ Camp Management Plan ▪ Cultural Heritage Management Plan ▪ Community Health Safety Security Plan ▪ Covid 19 Emergency Response Plan ▪ Emergency Preparedness and Response Plan ▪ Health and Safety Plan ▪ Labour Management Plan ▪ Landscape Management Plan ▪ Medical Waste Management Plan ▪ Noise and Vibration Management Plan ▪ Pollution Prevention Plan ▪ Quarry Management Plan ▪ Security Management Plan ▪ Soil Management Plan ▪ Supply Chain Management Plan ▪ Surface Water and Ground Water Management Plan ▪ Traffic Management Plan ▪ Waste Management Plan ▪ Wastewater Management Plan ▪ Contractor Management Plan c) Develop a Community Development Plan and implement the plan after approval of the Lenders. d) Ensure EPC develops, implements and monitors construction phase management plans and procedures that are yet to be approved by lenders. These include but not limited to: ▪ Local Recruitment Plan ▪ Habitat Restoration and Recreation Plan ▪ Hazardous Material Management Plan					
1.9	***EHSS Requirements for EPC and Sub-contractors*** Ensure EHSS requirements of the Project outlined in the ESMMP and CESMP are adopted by EPC and its subcontractors to align with national law and Lenders' requirements. These requirements to meet the below at a minimum: ▪ Environmental and social risks and impacts are fully considered and integrated within the EPC and sub-contractor pre-qualification, selection, onboarding, management and monitoring phases. ▪ Mitigation measures, including design-based measures, surveys and monitoring requirements outlined in the ESIA, ESMMP, ESAP and E&S Management Plans including RAP and SEP made known and annexed into contracts with EPC. ▪ Ensure that EHSS responsibilities of the relevant departments involved in onboarding, management and monitoring of sub-contractors (i.e., procurement, finance, HSES teams etc.) are carried out. ▪ Ensure EPC to develop procedures/method statements for the Project to manage the EHSS issues as set out in the ESMMP and CESMP. ▪ Ensure EPC to include provisions on Project's E&S requirements into its subcontractor agreements to comply with the Lender requirements and as a part of the selection process, an assessment of EHSS capacity and previous performance of subcontractors to be undertaken. ▪ Ensure EPC and its subcontractors updates management plans and procedures as necessary to include any changes or needs arising from implementation. Any such changes would be subject to SPV and lender approval.	Minimisation of EHSS impacts and risks through contracts.	EBRD PR1, IFC PS1.	SPV to monitor. EPC and sub-contractor to adopt and implement.	To be included in the tendering/procurement and monitoring process (of future contractors).	Tendering documents including provisions of CESMP and EHSS management plans. Contractor agreements aligned with provisions in CESMP and EHSS management plans. Training records kept by SPV and EPC.

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1.10	***Design Change Management Procedure (DCMP)*** Ensure EPC implements the DCMP where there is any design, technical or resource changes throughout the lifecycle of the Project to ensure mitigation of any related EHSS impacts. The DCMP to include provisions for the public disclosure of material issues associated with design changes (if any) and reporting to Lenders prior to design change implementation for approval throughout the project lifetime.	Optimisation of EHSS management through a formalised document and associated system.	EBRD PR1 and PR10, IFC PS1 and EP4 Principle 4.	SPV to supervise and approve and where necessary additionally obtain KGM's approval. EPC and O&M Contractor to implement.	Throughout Project lifetime in the event of any change in design, technical or resources.	Design change management procedure Design change register Final design that incorporates relevant mitigation measures.
1.11	***EHSS Resources*** Maintain adequate and site based EHSS resources throughout the lifetime of the Project as per the ESMMP and assess the EHSS needs and update the organisational chart to strengthen the teams if and as required as per the feedback of IESC and Lenders. Appoint and maintain at minimum: ▪ 1 SPV Deputy General Manager ▪ 1 HSSE Director ▪ 1 HSE Manager ▪ 1 Social Manager ▪ Gender expert/consultant to support implementation of the Gender Action Plan (GAP) ▪ 2 HSE Specialists ▪ 1 Deputy Social Manager//CLO ▪ 1 CLO ▪ 1 Agricultural Development Expert ▪ 1 Business Development Expert ▪ 1 Expropriation Chief ▪ 3 Expropriation Engineer ▪ E&S Supervision Consultants ▪ RAP Implementation Consultant ▪ Internal RAP Monitoring Consultant ▪ Independent Land Valuation Specialist ▪ Agricultural Consultancy Company ▪ Business Development Consultancy Company ▪ External Labour auditor Ensure that roles and responsibilities are clearly defined in their job descriptions and kept up to date. The resource requirements will be evaluated and fulfilled as necessary throughout the project's duration.	Increasing capacity and competency to manage social performance of the Project.	EBRD PR1, EBRD PR10, IFC PS1, EP4 Principle 4.and best practice.	SPV	On-board vacant positions before signing of loan agreement.	Appointment of dedicated staff; timelines for recruitment and appointments with CVs in line with the resources committed in the ESMMP. Management and update of organogram (when necessary) with job descriptions of roles and responsibilities for SPV.

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1.12	Require and ensure EPC and all sub-contractors appoint and maintain suitably qualified EHSS personnel who are responsible for the implementation of the EHSS elements of the Project as per their scope of work in line with the ESIA and ESMMP requirements. Minimum construction contractor EHSS personnel are specified in the ESMMP and CESMP. Ensure that EPC appoints and maintains at minimum the following positions prior to construction: ▪ 1 EPC Deputy General Manager ▪ 1 Project Manager ▪ 1 H&S Manager ▪ 1 E&S Manager ▪ 1 Senior Social Expert//CLO ▪ 1 CLO//Gender Focal Point ▪ 1 Chief Environmental Engineer ▪ 1 Environmental Engineer ▪ 1 Biologist ▪ 1 Archaeologist ▪ H&S team (23 members to meet the minimum requirements of OHS regulation) Ensure that EPC's roles and responsibilities are clearly defined in their job descriptions and kept up to date. The resource requirements will be evaluated and fulfilled as necessary throughout the project' construction and commissioning.	Ensure adequate and component resources are allocated for effective implementation of the project in line with the ESIA and relevant management plan commitments.	EBRD PR1, EBRD PR10, IFC PS1, EP4 Principle 4.and best practice.	SPV to oversee EPC implement	On-board by the end of July 2024. .	Appointment of dedicated staff; timelines for recruitment and appointments with CVs in line with the ESMMP requirements. Management and update of organogram (when necessary) with job descriptions of roles and responsibilities for EPC.
1.13	***EHSS Trainings*** a) Develop and implement a training plan within SPV throughout construction and operation for the relevant teams. EHSS teams as per ESMMP shall be fully trained and equipped for their roles prior to construction. b) Together with EPC conduct workshop(s) to provide training on contractor obligations and responsibilities of contractors on EHSS requirements prior to commencement of construction works and during construction based on a training needs assessment. c) Ensure EPC and its sub-contractors develop and implement training plans for their EHSS teams on EHSS requirements for effective implementation of the ESIA and E&S management plans throughout construction. d) Ensure an operational phase EHSS training plan is developed and implemented.	Increasing capacity and competency to manage social performance of the Project.	EBRD PR1, EBRD PR10, IFC PS1, EP4 Principle 4.and best practice	a) SPV to develop and implement b-c) SPV to monitor and EPC to develop and implement d) SPV to monitor and Operation and Maintenance (O&M) Contractor to develop and implement	a-c) Prior to and during construction d) Prior to and during operation	Training plans developed and submitted to the Lenders prior to construction and operation phases. Training records such a list of participants etc.
1.14	***EHSS Commitments Register and Budget*** ▪ Develop an E&S commitments register as per the ESIA, ESMMP and relevant management plans as well as the national legal requirements prior to Construction and submit it to Lenders. ▪ Allocate adequate resources and ensure that EPC allocates a specific budget for implementation of Project EHSS management plans based on a breakdown of constituent key elements, such as those mentioned in ESIA, ESMMP, CESMP, specific E&S management plans, RAP, SEP. Budget to be independent of CAPEX/OPEX and unaffected by other Project budgetary requirements. Set aside minimum 10% contingency for each constituent key element for unplanned remedial actions required.	Appropriate EHSS management during Project construction and operation.	EBRD PR1, IFC PS1 and best practice.	SPV	All to be complete prior to signing of loan agreement for construction related costs and 3 months prior to operation for operational costs.	E&S commitments register, EHSS management budget, including those mentioned in ESIA, CESMP, and management plans approved by Lenders.

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	▪ Submit the E&S resources allocated for management of E&S requirements as per the commitments register based on ESIA and national requirements to the Lenders prior to contract signing.					
1.15	***Contractor Performance Monitoring*** Maintain and record regular EHSS inspections of contractors including environmental, social, occupational health and safety (OHS) performance, labour management and supply chain management.	Ensure contractor compliance with Lenders' requirements on EHSS	EBRD PR1, PR2 and PR4, IFC PS1, PS2 and PS4 and best practice.	SPV to carry out and report inspections. EPC and O&M Contractor to keep records with input of sub-contractors.	SPV to carry out monthly inspection reports throughout construction and operation. EPC during construction. O&M Contractor during operation.	Reported SPV's bi-annually in the E&S Reports to IESC and Lenders. EPC's Monthly E&S Reports. O&M Contractor's Quarterly E&S Reports.
1.16	Ensure EPC and contractors, O&M Contractor set-up, maintain and regularly review the Incident and Accident Register to record non-compliance reports (NCRs), OHS accidents, incidents and near misses throughout the duration of the Project as required in the ESMMP. Notify Lenders on material issues (i.e., environmental incidents, labour strikes, forced, child labour, retaliation, GBVH incidents, occupational incidents, and fatalities) including third party incidents in line with the Loan Agreement.	Management of EHSS accidents and incidents.	EBRD PR1, IFC PS1. EBRD PR4, IFC PS4 and best practice.	SPV to oversee EPC and O&M contractor on incidents and accidents and notify Lenders on material issues. EPC and O&M Contractor to set-up, maintain and review incident and Accident register and NCRs. EPC and O&M Contractor notify SPV on material issues and prepare detailed investigation report.	Throughout project lifetime. Notification to the Lenders immediately upon the occurrence of any incident or accident. Detailed Incident investigation report to be submitted to Lenders within max. 1 month after the incident.	EHSS Incident Reporting Procedure. Regularly updated Incident and Accident Register EPC's Monthly E&S Reports Progress update reports provided by SPV to the Lenders as per ESAP 1.1. Records of each E&S incident kept daily including GBVH cases and injuries/fatalities. Detailed Investigation and root cause assessment reports
PS2/PR2	**Labour and Working Conditions**					
2.1	Ensure SPV's own teams, EPC, O&M contractor and sub-contractors implement the Human Resources Policy, Human Rights Policy and requirements of Labour Management Plan, as well as other relevant plans committed in the ESMMP (i.e., Camp Management Plan and Gender Action Plan) effectively to respect the rights of employees in accordance with national policy, and Lenders' requirements. This will include but not be limited to: ▪ HR policy and procedures to cover the fundamental principles related to workers' rights to form and join workers' organizations, collective bargaining, equal opportunities and non-discrimination, grievance mechanism, ban of child and forced labour, zero tolerance to retaliation against workers and sexual harassment and gender-based violence, provision of a safe and healthy work environment, maximizing local employment; employment benefits; privacy and data protection; worker accommodation; disciplinary measures; collective dismissals and retrenchment; and requirements for security personnel. ▪ Ensure Lenders' labour requirements are cascaded down into EPC and sub-contractors' scope of work through inclusion into tender documentation, contracts and their policy and procedures during construction and operation. ▪ Include provisions in EPC and O&M contract for penalties or other legal arrangements to ensure timely payment of wages and overtimes. ▪ Disclose the Project Human Resources Policy to all Project workers and provide training to workers on their rights and Code of Conduct principles.	Minimise labour management related risks. Employee awareness about their labour rights, including wages, benefits, overtime.	EBRD PR2, IFC PS2, EP4, and Turkish Labour Code.	SPV, EPC, O&M Contractor and sub-contractors all to implement and SPV to oversee all.	SPV prior to and throughout construction and operations. Internal labour audits carried out by EPC and O&M contractor monthly throughout construction and operation.	Human Resources Policy statement communicated to project workforce (including EPC, subcontractors, and core supplier workers). Training and induction records. Workforce statistics reported in the SPV's bi-annual E&S reports submitted to Lenders. Written contracts issued for all workers in a language understandable to them. Reporting on percentage of employees signing code of conduct as part of their labour contract. Internal audit check list and internal audit reports with supportive documents such as: Payrolls and working hours records. Worker's grievance records and/or court case records. Any material labour issues such as protests/strikes shall be reported to the Lenders as part of SPV's bi-annual E&S monitoring reports or immediately in case of material incident.

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	▪ All Project workers (including sub-contractor workers) should be provided with clear and understandable information regarding their terms and conditions of employment through employment contracts, induction records and regular monthly reports. ▪ Ensure an effective tracking mechanism for working hours and payments (including overtime payments) is in place for all Project workers (including subcontractors) in line with the legal requirements. ▪ Conduct internal monthly monitoring of EPC and O&M management of Project workers (including sub-contractors and core suppliers), against the labour requirements of Lenders and national requirements.					
2.2	***Quarterly Independent Labour Audits*** SPV to engage a third-party qualified labour auditor to conduct quarterly labour audits during construction and annual during operations to the project workforce including SPV, EPC and sub-contractors, core suppliers in line with the PR 2 and national requirements as committed in the Labour Management Plan. The audit will include review of worker accommodation camps as well as their working conditions and confidential interviews with workers and workers representatives. Submit the labour audit protocol and CV of the shortlisted labour auditor prior to contract signing and obtain Lenders' approval. SPV to report the key findings of the labour audits and corrective actions taken as part of their reporting process as per ESAP action 1.1.	Reduced risk associated with labour disputes and grievances.	EBRD PR1, PR2 and PR4; IFC PS1, PS2 and PS4; and EP4.	SPV	Quarterly Labour Audit Reports throughout construction, and annual labour audits during first two years of operation. 1st independent quarterly labour audit report to be submitted prior to signing of loan agreement.	Quarterly Independent Labour Audit Reports. Annual labour audit reports in first 2 years in operations Key findings and actions are reported in the SPV's bi-annual E&S Reports submitted to Lenders.
2.3	***Workers Grievance Mechanism*** ▪ Establish and implement a Worker's Grievance Mechanism (GM) covering all project workforce including SPV, EPC and subcontractors and core suppliers' workers grievances that allows for timely feedback, without any retribution and reprisal risks. ▪ Disseminate information about Worker's Grievance Mechanism's use to the workforce (in the languages understood by the workers). ▪ Appoint and train grievance officers separately to coordinate the implementation of the Worker's Grievance Mechanism ▪ Effectiveness of Worker's GM is monitored regularly and ▪ Implementation verified through evidence including worker's grievance records, training records and grievance boxes.	Reduced risk associated with labour disputes and grievances.	EBRD PR2, IFC PS2, EP4, and Turkish Labour Code.	SPV to establish EPC and O&M Contractor to adapt and implement.	Throughout construction and operation.	Worker's grievance register that compiles worker grievance at all levels (SPV, EPC, sub-contractors and core suppliers).
2.4	Implement the Gender Action Plan including but not limited to the Gender Based Violence and Harassment Policy (GBVH) to prevent and address any form of GBVH with the support of an external GBVH expert. ▪ Develop and implement a GBVH incident reporting procedure and disclose it to employees, including the contractors' workforce. ▪ Ensure that the workers grievance mechanism allows for raising confidential/anonymous grievances on incidents of sexual harassment in the workplace and/or Project site(s) through establishing separate confidential channels and developing specific procedures for GBVH-related grievances. ▪ Assign and train a GBVH focal point (female) to deal with GBVH related incidents and grievances. ▪ Develop response measures and support mechanisms for survivors. ▪ Provide induction training on the GBVH for all employees and contractors. ▪ Contractually require all sub-contractors to adopt a CoC covering GBVH, and to communicate these to their employees.	Equal opportunities and non-discrimination.	EBRD PR2, IFC PS2 and Turkish Labour Code.	SPV, with the support of EPC and sub-contractors. External GBVH expert to be hired prior to signing of loan agreement.	GBVH expert to be assigned prior to contract signing SPV to implement the GBVH Policy throughout project life. EPC to develop GBVH incident reporting procedure prior to onboarding sub-contractors. Training provided by SPV to EPC and sub-contractors prior to work commencement. EPC to appoint gender focal point prior to work commencement.	GBVH consultant assigned GBVH policy adopted by SPV, EPC and subcontractors. Tender and contract documentation. GBVH Focal Point appointed. Specific GBVH training log (including number of employees receiving GBVH Training). GBVH policy and code of conduct included into contracts of all contractors and sub-contractors and signed by all Project workers. Procedures for reporting GBVH-related or other confidential cases/grievances developed and implemented.

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	▪ SPV to immediately report to the EBRD's GBVH Focal Point at GBVH FocalPoint@ebrd.com on any GBVH and other gender related allegations, grievances and incidents reported to them.					Grievance records separated to be able to report on different categories and sensitive categories such as GBVH. GBVH incident memos sent to the EBRD GBVH focal point. Progress update on implementation of Gender Action Plan is issued as part of regular SPV's bi-annual E&S reports to the lenders.
2.5	Ensure that worker accommodation camps are compliant with the EBRD/IFC Worker Accommodation Guideline as well as national standards. Ensure EPC effectively implements the Camp Management Plan including the additional measures below: ▪ EHS (including fire safety) and hygiene standards to be applied as part of the external accommodation selection criteria and monitoring including provision of first aid, clean water supplies and waste management, among others. ▪ Mitigation measures for communicable diseases i.e. COVID-19 risks, including provisions to reduce psychological effects on workers in case of quarantine and isolation requirements. ▪ Design of camps that are gender inclusive to avoid any potential risks to female workers.	Effective management of labour accommodation to reduce unsafe and unsanitary living conditions.	EBRD PR2, IFC PS2, EBRD/IFC Worker Accommodation Guidelines, best practice	SPV to monitor EPC to implement	Throughout construction.	Workforce Accommodation Plan. Camp Management Plan Documented evidence on application of the selection criteria defined in the Accommodation Plan for selection of external accommodation. Accommodation and camp site monthly audit reports and inspection logs
2.6	***Supply Chain Management Plan*** Ensure EHSS including labour risks are addressed in the whole supply chain in line with Lenders' requirements. Implementation to cover the following provisions: ▪ Establish a responsible sourcing policy; a supplier selection criteria and procedure and ensure traceability from core suppliers through maintenance of a register of all Project primary suppliers. ▪ Ensure all core suppliers adopt self-declarations and codes of conduct regarding prohibition of any forms of forced and child labour in their operations prior to any engagement with them. ▪ Engagement clauses to be added to the agreements with suppliers in case of material non-compliance with key provisions listed in the responsible supplier policy. ▪ Monitoring procedure to ensure ongoing compliance with Project requirements, including definition of the frequency of monitoring and issues to be monitored, focusing on age of workers and presence of forced labour etc. ▪ Notify IESC and Lenders immediately if/when any forced/child labour risks or allegations are raised in relation to its core suppliers. ***Solar supplier*** SPV to use the Green Technology Selector to choose an approved solar panel supplier for the solar panel installed on the administration building which is planned at the capacity of 400 kW.	Effective oversight of labour rights within the primary supply chain, to reduce labour violations and abuse of human rights.	EBRD PR2, IFC PS2 and EP4.	SPV and EPC	EPC to implement Supply Chain Management Plan throughout construction. SPV to conduct supply chain assessment of the solar power prior to purchase agreement signing.	Supply Chain Management Plan approved by lenders. Supplier Mapping Supplier risk assessment Evidence of self-declarations and codes of conduct adopted by core suppliers. Evidence of ongoing monitoring of core suppliers' compliance with Project commitments, as per frequency established in the plan. Proof of dis-engagement clauses included in supplier contracts. Statistics and information reported in the SPV's bi-annual E&S Reports submitted to Lenders.
2.7	***Local Recruitment Plan*** Develop and implement a Local Recruitment Plan that ensures equal opportunities are provided to local men and women with various skill sets, and priority is given to affected vulnerable groups including poor, and	Enhance job opportunities and skills development for local communities.	EBRD PR2, IFC PS2 and EP4	SPV to develop and implement	Prior to signing of loan agreement and implemented throughout construction and operation.	Local Recruitment Plan submitted to Lenders, reviewed, and approved.

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	workers of businesses (including migrant workers) that might lose jobs after resettlement. Consider different channels of communication to inform Project affected communities on employment opportunities, training, and promotions. All on-the-job and technical training to be provided free of charge by the contractor or subcontractors as per the workforce training plan.			EPC and O&M Contractor to adapt and implement		Evidence of ongoing disclosure of job opportunities and provision of skills development for local community members.
PS3/PR3	**Resource Efficiency and Pollution Prevention and Control**					
3.1	***Materials Management*** Ensure that EPC updates and implements the Quarry Management Plan to include the selection and sourcing of raw materials (aggregate, sand, gravel and crushed stone) of appropriate grade, quality and the most environmentally sustainable products within the supply chain. As a minimum, the Quarry Management Plan should ensure that: ▪ Institutional arrangements are included between SPV and EPC on how the management and monitoring of material use is carried out; ▪ Materials are sourced from sites that have the required licences/permits in place; ▪ E&S risks are assessed on those identified sites; ▪ Due diligence for the selection of quarries that comply with national standards and good international practice (including lender's requirements); and ▪ Duty-of-care monitoring of suppliers (such as quarries) used to source Project materials.	Improved resource efficiency.	EU EIA Directive, EBRD PR3, IFC PS3, EP4 Principle 2 and best practice.	SPV to monitor EPC to update and implement	Approved plan to be ready by July 2024 prior to construction. Implemented during construction.	Updated Quarry Management Plan (including details on material management) approved by Lenders.
3.2	***Greenhouse Gas Assessment*** Ensure that EPC undertakes a Greenhouse Gas (GHG) assessment from 2023 (full year data) to quantify and report scope 1 and scope 2 GHG emissions annually using lender requirements and include measures to reduce GHG emissions.	Reduce and minimise GHG emissions.	EBRD Protocol for Assessment of GHG Emissions, EP4 Principle 10.	SPV to ensure EPC's appointment of an external consultant to undertake the GHG assessment.	Annually	GHG emission data to be included in EPC's Monthly E&S Reports issued to SPV. GHG emissions reported within reports to Lenders as per ESAP action 1.1.
3.3	***Resource Efficiency*** Ensure EPC collects resource consumption use data on water, energy, materials and waste on a monthly basis. SPV HSSE Director completes a Resource Efficiency Audit to cover energy use, water use, use of other resources (including materials) and the reuse, recycling and recovery of waste where available//practicable. Ensure EPC implements the findings of the resource efficiency audit (if any corrective actions). Report to Lenders resource consumption use data and audit findings in SPV's bi-annual E&S Reports.	Improved resource efficiency.	EU EIA Directive, EBRD PR3, IFC PS3 and best practice.	EPC to collect resource consumption use data. SPV HSSE Director to undertake the Resource Efficiency Audit EPC to implement Audit findings. SPV to report resource efficiency in bi-annual reports.	Monthly resource consumption data collection by EPC. The resources efficiency audit to be complete within the first 6 months of construction and findings implemented throughout the duration of the construction works. Resource efficiency information reported in SPV's bi-annual E&S Reports.	EPC's Monthly E&S Report prepared for SPV Resource Efficiency Audit and findings SPV's bi-annual E&S Reports to include findings from Resource Efficiency Audit.
3.4	***Air Quality Action and Monitoring Plan for Operations Phase*** Ensure O&M Contractor develops and implements an Air Quality Action and Monitoring Plan for the operation of the scheme. This can be based on passive monitoring techniques (e.g. diffusion tubes), would include dust emissions and should focus on areas of potential exposure alongside the route. The action plan should identify potential mitigation measures for operation to reduce impacts if there is a risk of exceeding	Prevention of adverse air quality impacts.	EU EIA Directive, EBRD PR3, IFC PS3 and best practice.	SPV to oversee and supervise O&M Contractor to develop and implement	Prior to operation.	KPIs completed as per the requirements specified in the Air Quality Action and Monitoring Plan (to be developed for the operational phase). Air quality data in SPV's bi-annual E&S Reports where there are exceedances of the required standards and corrective actions need to be implemented.

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	air quality standards. Measures could include localised speed restrictions or the installation of physical barriers (solid or vegetation).					
3.5	***Noise and Vibration Mitigation During Construction*** Ensure that EPC implements the Noise and Vibration Management Plan including designing noise mitigation for specific sensitive locations as part of the motorway planning, as the level of detail of the design progresses. This should consider: ▪ Opportunities for further landscape bunding or noise barriers should be explored to provide noise screening where appropriate to address significant noise impacts. ▪ Relevant noise barrier suppliers will need to confirm the actual design based on the actual noise measurements during construction and operation phase. ▪ Implement additional mitigation measures such as insulation of nearby building structures (typically consisting of window replacements), where required. ▪ Construction and operation activities should comply with the IFC General EHS – Noise Level Guidelines. ***Noise and Vibration Monitoring During Operation*** Ensure that O&M Contractor: ▪ Undertakes an assessment of anticipated noise and vibration levels during operation phase at identified sensitive receptors. ▪ Incorporates any additional mitigation and monitoring measures into the OESMP and Project design, such as locations for noise barriers to be built and low noise road surface. ▪ Implements additional mitigation measures such as noise barriers and low noise road surface where required in particular houses close to the cable stayed bridge that have not relocated.	Prevention of adverse impacts associated with noise and vibration.	EU EIA Directive, EBRD PR3, IFC PS3 and National Legislation, the IFC General EHS Guidelines – Noise Level Guidelines	SPV to monitor EPC to implement during construction. O&M Contractor to implement during operation.	Design of mitigation measures prior to recommencement of construction works. Implement and monitor management plan during construction and operation.	Detailed noise and vibration mitigation measures considered within the design . Records of noise and vibration inspections/monitoring as in the EPC's monthly E&S Reports. Evidence of implementation of mitigation measures where appropriate. Grievance records.
3.6	***Climate Resilience Assessment Report*** Implement the Climate Resilience Assessment Report and ensure the measures are incorporated into the design and applied throughout relevant phases of the Project. Review and update the Emergency Preparedness and Response Plan as necessary according to findings of the Assessment Report.	Reduce and minimise climate impacts.	EU EIA Directive, EBRD PR3, EP4 Principle 2 and best practice.	SPV and EPC to implement Climate Resilience Assessment EPC to implement and update Emergency Preparedness and Response Plan	By August 2024	Updated Climate Resilience Assessment Report Findings integrated into design and the Emergency Preparedness and Response Plan, if required.
PS4/PR4	**Health, Safety and Security**					
4.1	***Occupational Health and Safety*** Ensure EPC develops site specific health and safety risk assessments prior to construction activities and implement appropriate measures in line with the H&S management plans specified in the ESMMP and CESMP as per national legislation and Lenders' requirements.	Avoid/minimise occupational health and safety risks to workers and third parties.	National OHS requirements, EBRD PR4, IFC PS4, EP4, and best practice	SPV to oversee EPC implementation. EPC to carry out assessment.	Prior to and update risk assessments throughout construction.	Site specific risk assessments, health and safety measures to be evidenced with photos, PPEs and training records etc.
4.2	***Community Health and Safety during Construction*** ▪ Regularly assess effectiveness of proposed community health and safety measures if any changes in Project design or construction.	Minimisation of community health and safety and gender risks.	EBRD PR4, IFC PS4, EP4, and best practice.	SPV EPC O&M Contractor	SPV to oversee and EPC to implement actions identified for construction to be carried out until	Report on findings of site-specific risk assessments and mitigations implemented as part of EPC's Monthly E&S Reports to the Lenders.

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	▪ Undertake appropriate measures such as fencing to avoid unauthorised access to the road, traffic management arrangements including safety campaigns to sensitive receptors, provision of controlled access for animal passes/crossing points, all blasting activities will be undertaken in close coordination with local authorities, and in consultation with project affected communities. ▪ Develop and implement enhanced mitigations based on site specific risk assessments to address the potential negative health and safety risks to vulnerable groups such as children, elderly and disabled. ▪ Ensure evaluation of OHS and community health and safety measures are embedded into work permit system. ▪ Ensure and include gender aspects (adequate road/pass way lighting, providing safe commuting transportation for women community members during engagement sessions, gender-safety stops/panic buttons in highway stops etc.). ***Community Health and Safety during Operation*** Develop and implement a Community Health and Safety Management Plan for operations phase.				finalisation of design and throughout construction. SPV to ensure O&M contractor prepares Community Health and Safety Management Plan for operation 3 months prior to operation and implement throughout operation.	Work permit system Operation phase Community Health and Safety Management Plan.
4.3	***Road Safety*** Consider the recommendations of the 1st Road Safety Audit (RSA) (basic design) and the upcoming three RSAs to be conducted at each of Stage 2 (Detailed design), Stage 3 (Pre-opening) and Stage 4 (Early operation) in line with the EU Directive 2008/96/EC on Road Infrastructure Safety Management with an aim to improve road safety within the Project design and construction. Where recommendations have not been accepted, a clear justification is to be made on why these cannot be implemented. All accepted recommendations will be incorporated into the final road design.	Minimise accidents and incidents with road users and maintain access for local communities.	EBRD PR4, IFC PS4 and EU Directive 2008/96/EC on Road Infrastructure Safety Management.	SPV with the support of EPC to conduct 2nd and 3rd RSA, and consider the recommendations. SPV with the support of O&M Contractor to conduct and consider the recommendations of 4th RSA.	Adjustments to final design and prior to invitation to tender for recommencement of construction. Within 6 months of operation.	Stage 2 RSA Report and Corrective Action Plan. Stage 3 RSA Report and Corrective Action Plan. Stage 4 RSA Report and Corrective Action Plan. Report on findings captured within the Project design.
4.4	***Management of Blasting Risks*** Ensure EPC effectively implements the Blasting Management Plan including the additional measures below: ▪ Structural building assessments to be carried out by competent independent experts at the locations where buildings are within 50 m of significant sources of vibration and blasting prior to the activities at these areas. A report to be prepared for each of the identified buildings, which will include photographs of buildings and results of the sensitivity evaluation. ▪ In case of a third-party claim on damage to buildings, SPV to hire a third- party expert to assess the causes of the damage and develop mitigation measures to be agreed with the complainant (i.e., restoration or compensation etc.); and SPV/EPC to prepare and implement an evacuation plan for cases where houses/structures are or can be damaged due to blasting/vibration; and assist the affected people during temporary or permanent resettlement as per RAP principles. The damage to houses and effectiveness of restoration shall be investigated and confirmed by third party experts prior to the return of affected people.	Management of EHSS accidents and incidents.	EBRD PR1 and PR2, IFC PS1 and PS2 and best practice.	SPV to supervise and EPC to implement the Blasting Management Plan	Monitoring and review throughout construction.	Reported annually in the SPV's bi-annual E&S Reports to IESC and Lenders.
4.5	***Traffic Management*** Ensure EPC effectively implements the Traffic Management Plan including the additional measures below: ▪ Develop and implement a road safety policy, practices and procedures and practices to include a defensive, anti-rollover and antiskid driving to all drivers,	Minimise traffic risks	EBRD PR4, IFC PS4 and EU Directive 2008/96/EC on Road Infrastructure Safety Management.	SPV to supervise and EPC to implement the Traffic Management Plan and other measures	Traffic/road safety training and speed control measures will be in place prior to construction.	TMP Training record GPS monitoring to all project vehicles

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	▪ Implement speed limits and monitor all project vehicles on a daily basis through GPS, ▪ Assess the driving skills of the existing and new drivers of heavy vehicles. Monitor and analyse the incidents including those involving third parties develop actions to prevent similar incidents and inform lenders on all material incidents as per the loan agreement.					Additional speed control measures close to sensitive receptors
4.6	Ensure EPC effectively implements the Emergency Preparedness and Response Plan Develop and implement operation phase Emergency Preparedness and Response Plan	Emergency preparedness and response Protection of community health and safety	EBRD PR4 Occupational Health and Safety Law No. 6331 Regulation on Emergencies at Workplaces	SPV to supervise and EPC to implement the Emergency Preparedness and Response Plan during construction. SPV to supervise and O&M Contractor to develop and implement the Emergency Preparedness and Response Plan during operation.	Throughout construction and operation.	Emergency Preparedness and Response Plan for construction and operation.
4.7	***Security*** Ensure EPC effectively implements the Security Management Plan including the additional measures below: ▪ Conduct regular security risk assessments including security risks to third parties and implement appropriate mitigations to address security and human rights risks to workforce and third parties. ▪ Due diligence and background checks to be undertaken as part of security recruitment process. ▪ Zero tolerance policy against retaliation by security providers to be disclosed to all security officers and all project workforces. ▪ Effectively monitor and potential grievances related to conduct of security personnel. ▪ Monitor labour conditions of security personnel on regular basis through independent labour audits as per action 2.3 above.	Minimise security and human rights risks.	IFC PS4, EBRD PR4, EP4 and best practice such as Voluntary Principles on Security and Human Rights	SPV to supervise and EPC to implement the Security Management Plan	Background checks conducted prior to security provider onboarding. Security Management Plan implemented throughout construction.	Provision of Security Management Plan including security risk assessment. Security Code of Conduct. Evidence of regular monitoring of provision of security services provided. Grievance records. Training records.
PS5/PR5	**Land Acquisition, Involuntary Resettlement and Economic Displacement**					
5.1	Implement the Resettlement Action Plan (RAP). Ensure that the RAP execution includes: ▪ Completion of land acquisition activities as per the RAP implementation timeline and timely disbursement of the RAP payments by KGM and payments made under RAP Fund for costs not covered under national law by SPV in line with the RAP Fund Implementation Procedure. ▪ Regular coordination with KGM/PIU to ensure design changes or other Project developments are incorporated into KGM's expropriation programme and budget. ▪ Update valuation of lands/assets/crops regularly (at minimum annually) to ensure market prices are reflected in valuation and full replacement cost is paid in line with the Lenders' requirements.	Management of land acquisition and resettlement risks through a formalised document and associated system.	EBRD PR5 and IFC PS5.	SPV in close coordination with KGM	RAP implemented immediately until RAP completion audit is approved by Lenders. PIU meetings carried out quarterly until RAP completion confirms successful completion of RAP commitments. Valuation study of December 2023 revisited in Q4 2024 and each year afterwards.	RAP and RAP budget. RAP Fund Implementation Procedure. Internal and external RAP monitoring reports. Payment /RAP Fund disbursement records. PIU quarterly meeting minutes Updated valuation Study (each year).
5.2	***Effective Coordination with KGM*** Coordinate and maintain regular quarterly Project Implementation Unit (PIU) meetings with KGM to ensure land acquisition is implemented and status updates are presented in a timely manner as per the RAP	Effective management of land acquisition and resettlement risks through a formalised system.	EBRD PR1 and PR5, IFC PS1 and PS5 and Turkish Expropriation Law.	SPV and KGM	PIU coordination meetings effective as of June 2023 and conducted quarterly until RAP completion audit.	Quarterly PIU meeting minutes (containing the discussion items and key actions agreed. The frequency of meetings can be increased depending on the

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	implementation and construction schedule and in line with the national laws and Lenders' requirements. The PIU (joint task force formed by SPV and KGM representatives) will ensure that both KGM and SPV carry out their own responsibilities in achieving effective implementation and monitoring of land acquisition activities as defined in RAP and as per Lenders' requirements. PIU meetings to discuss at a minimum ("discussion items"): ▪ Expropriation process and any key issues that may influence Project activities; ▪ Negotiation process and success rates and other consultations carried out; ▪ Progress of land registration and transfer to KGM; ▪ Court cases open and closed; ▪ Compensation payments made, pending, planned; ▪ Grievances (if any received by KGM); ▪ Issues that need liaising with other authorities; ▪ Timeline for the SPV actions required (payments from RAP fund, additional consultations carried out, implementation of LRP measures etc.).	Avoid any potential delays in construction				emergency//significance of actions that need to be carried out by KGM or SPV.) Land acquisition status data obtained from PIU.
5.3	Prioritise completion of corrective actions agreed with Lenders for the lands affected during early construction phase. These actions include: ▪ Obtaining land permits to all public and private lands already entered by EPC (on the RoW and for OHTLs) prior to the contract signing with the Lenders. ▪ Completing compensation payments for affected lands including stripped parcels and those affected by OHTL construction prior to financial closure. ▪ Making disbursements from the RAP Fund where KGM has completed expropriation for already entered lands and impacted businesses prior to contract signing. ▪ Communicating final design of Project alignment to KGM to determine land take requirements for OHTL displacements in KM 49+500 and Bahcesehir Connection Road. ▪ Consulting and guiding heirs of deceased landowners to complete title transfer prior to negotiation with KGM on land take.	Restoration and compensation of past land acquisition impacts and minimising land acquisition and resettlement risks.	EBRD PR5 and IFC PS5.	SPV and KGM All payments to be made before access is granted for construction works. Final design of Project alignment to be complete to assess additional impacts from OHTL displacement.	Land permits obtained prior to contract signing. Evidence of payments to those lands initially entered (stripping and OHTL parcels) prior to financial closure. Documented evidence of RAP Fund disbursements commencing prior to signing of loan agreement. EPC to communicate final design to KGM in Q3 2024 Inheritance transactions complete before Article 8 invitations are sent by KGM.	Title deeds transferred to project for stripping and OHTL parcels and records of compensation payment made with documented evidence. Records of permits obtained. Land entry protocols Documented evidence of RAP Fund disbursements Final design shared with KGM Grievance records related to past land acquisition. Consultation records with heirs of landowners of impacted lands.
5.4	Make available and disseminate Guide to Land Acquisition and Compensation (GLAC) in local languages during future consultations with affected people and verbally explain their rights under the national expropriation law and as per Lenders' requirements prior to expropriation taking place by KGM.	Increased awareness on Project benefits through diversified engagement tools	EBRD PR5, IFC PS5, EBRD PR10, and IFC PS1	SPV and KGM	GLAC to be published and distributed prior to expropriation and throughout RAP implementation. GLAC to be made available on Project website	GLAC Availability of GLAC on Project website.
5.5	Ensure consultation and negotiation meetings are held with project affected people prior to any court process as per Lenders' requirements with an aim to acquire land through consent agreements. Immediate expropriation (Article 27) process is used as a last resort in line with the RAP only if negotiations fail and if there is need for urgent expropriation based on construction timeline. Ensure transfer of deeds are finalised for heirs of impacted assets before KGM's invitation to negotiation is sent and before any court process is initiated.	Maximising number of negotiated settlements.	EBRD PR5, IFC PS5, EBRD PR10, and IFC PS1	SPV and KGM	Prior to Article 8 notifications being sent.	Records of land acquisition consultation and negotiation meetings with affected communities and businesses. Number of consent agreements/court cases. Number of deeds transferred to heirs identified. Number of heirs assisted and provided financial support to resolve inheritance transactions.

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	Ensure Project's financial support is used effectively to resolve transfer of rights and ownership from deceased owners through awareness campaigns in affected communities.					
5.6	Ensure land entry and exit is carried out by EPC through Land Entry and Land Exit Protocols (LEPs).	Prevention/minimisation of land acquisition impacts	EBRD PR5, IFC PS5, EBRD PR10, and IFC PS1	SPV to oversee the process. EPC to apply protocols.	Land entry after payment of compensation to right holder. Land exit after reinstatement of land to its pre-project status.	Land entry and exit protocols signed. Internal RAP monitoring reports. Grievance records
5.7	Avoid forced eviction in physical resettlement cases. Conduct timely and robust engagement activities to comply with the resettlement procedures defined in the Expropriation law and specified in the RAP. Ensure that the relocation process of all affected owners of houses and businesses are completed prior to land entry in line with the RAP and resettlement assistance is provided to households and businesses as per RAP. Measures below to be actioned on for each case requiring physical displacement businesses and houses: ▪ Immediately inform building and house owners, as well as tenants, of the cut-off date, stating that expropriated structures cannot be rented or further used. ▪ Issue eviction notices with deadlines to all expropriated businesses and houses in line with national law and RAP. ▪ Prioritise evacuation of expropriated businesses and houses ensuring they know their entitlements under the RAP fund. ▪ Agree upon and promptly disburse compensation as required under Turkish expropriation law and RAP Fund payments as per Lenders' requirements. Implement resettlement assistance packages to support the timely relocation of businesses prior to granting land access to EPC.	Prevention/minimisation of land acquisition impacts	EBRD PR5, IFC PS5, EBRD PR10, and IFC PS1	SPV and KGM	Durations specified in RAP for relocation of houses and businesses and prior to granting access to land.	Records of compensation payment made with documented evidence. Records of RAP engagement activities. Grievance records Internal RAP monitoring reports. External RAP monitoring reports.
5.8	Implement RAP Fund implementation procure in line with Lenders' requirements and RAP commitments in a timely manner and ensure specific focus is given to vulnerable PAPs in implementation of livelihood restoration measures. Additionally ensure the RAP Fund: Develop and implement detailed livelihood restoration packages to project affected people and businesses.	Prevention/minimisation of land acquisition impacts	EBRD PR5, IFC PS5, EBRD PR10, and IFC PS1	SPV	RAP Fund payments for all affected lands entered by EPC previously to be completed prior to signing of loan agreement. The remaining payments to be made in line with the agreed timeline prior to land entry by the EPC. Livelihood restoration packages to be delivered by SPV in parallel to and following the expropriation process by KGM on a case-by-case basis.	RAP Fund implementation procedure RAP Fund budget RAP Fund payment records List of vulnerable PAPs and LRP activities conducted. Livelihood restoration packages implementation logs
5.9	Compensate any unplanned temporary or permanent damage to buildings, land, or livelihoods in accordance with the Lenders' performance requirements on land acquisition and resettlement.	Management of risks to buildings and communities	EBRD PR4, IFC PS4, EBRD PR5, IFC PS5	SPV to monitor EPC to prepare and implement	Prior to contract signing and throughout construction.	Building infrastructure surveys Building Monitoring, Control and Management Plan for temporary land take due to safety risks to residents Compensation records to damaged crops, lands, buildings

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5.10	Ensure EPC has an effective remedy mechanism for any damages ; i.e. immediately repairs or provides alternative solution in case they damage the water or electricity supply or any other critical infrastructure. Ensure EPC fully reinstates pathways, other local infrastructure and agricultural land entered temporarily to at least their pre-Project condition upon the completion of construction.	Prevention/minimisation of land acquisition impacts	EBRD PR 5, IFC PS5, EBRD PR 10, and IFC PS1	SPV to supervise and monitor EPC to implement	Prior to signing land exit protocols for each individual case.	Provisions incorporated to EPC Contract Reinstatement activity log. Land exit protocols.
5.11	Conduct monthly internal monitoring of RAP to assess implementation progress against established indicators and the time schedule. This monitoring will include regular site visits, PIU meetings with KGM, consultations with stakeholders, and a review of relevant RAP implementation records, including grievances.	Management of land acquisition and resettlement risks.	EBRD PR5, IFC PS5.	SPV	Monthly as of start of the implementation of the RAP/July 2023.	Monthly internal RAP monitoring records and reports submitted to Lenders as per ESAP action 1.1.
5.12	Ensure effectiveness and outcomes of RAP implementation is monitored externally on a quarterly basis by qualified independent RAP Monitoring consultant commissioned. The RAP Monitoring shall include confidential interviews with affected people and businesses on RAP implementation.	Independent monitoring of land acquisition and resettlement risks.	EBRD PR5, IFC PS5.	SPV	Quarterly from Q2 2024 until the RAP Completion Audit is approved by lenders.	Quarterly external RAP monitoring reports submitted to Lenders as per ESAP action 1.1.
5.13	Prepare and submit to Lenders a Land acquisition and Resettlement Execution Report to verify that RAP implementation is complete, and the Project is ready to undergo the RAP completion audit in line with the RAP. The Execution Report shall be developed in line with the format to be agreed with the Lenders.	Internal monitoring of land acquisition and resettlement risks.	EBRD PR5	SPV	Upon completion of all RAP implementation activities.	RAP internal and external monitoring reports. Land acquisition and Resettlement Execution Report in a format to be agreed with Lenders
5.14	Recruit an independent consultant to carry out the RAP Completion Audit to be approved by Lenders Confirm that the provisions of RAP including livelihood restoration measures implemented are fully met to the satisfaction of the Lenders and assess overall RAP implementation performance. The Completion Audit to indicate any open and unresolved issues with regards to RAP implementation and present a corrective action plan (if required).	Independent monitoring of RAP implementation performance.	EBRD PR5, IFC PS5.	Independent RAP Completion Audit Consultant approved by Lenders and commissioned by SPV. SPV and KGM to carry out corrective actions (if any).	Carried out once, after all inputs in the process, including any developmental initiatives, have been completed.	RAP Completion Audit. Reported in the quarterly monitoring reports until RAP completion audit.
PS6/PR6	**Biodiversity Conservation and Sustainable Management of Living Natural Resources**					
6.1	***Bat Surveys*** Undertake additional bat surveys within Project AoI at suitable locations as informed by the Project ECoW/biodiversity specialist. This is required to address gaps in the baseline studies and ensure that any roosts identified can be mapped in order to inform targeted construction mitigation as described within CESMP.	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV EPC Ecological Clerk of Works (ECoW)	Pre-construction at the location where the Bat Survey is required	Additional Bat Survey results. CESMP.
6.2	***Botanical Surveys*** Undertake additional botanical surveys to identify additional rare/endemic plant species outside of construction footprint but within AoI, within suitable habitat (as informed by the Project ECoW/botany specialist. This is required to inform ongoing monitoring of air quality impacts during construction and operation. Findings to be updated in CESMP.	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV EPC ECoW	By July 2024	Additional botanical survey results. CESMP.
6.3	***Bird Flight Activity Monitoring***	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV to supervise	Throughout operation in years 1-3 – i.e. from the point of the bridge having	Monitoring plan including methodology to be agreed with Lenders prior to implementation

No	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	Ensure EPC designs and completes a monitoring programme of bird flight activity around the cable stayed bridge, to ensure that the proposed mitigation is effective in this regard. Should any results suggest the impact to birds is greater than predicted, then immediate consultation should be undertaken with Lenders (i.e. within 48 hrs) to agree an appropriate approach to mitigation.			O&M Contractor to implement	been constructed (and then requirement for further monitoring reviewed).	SPV's bi-annual E&S Reports during construction and operational phase monitoring reports to include any adaptive management recommendations required to be implemented to ensure no significant residual effects to birds.
6.4	***Constraints Mapping*** Conduct pre-construction mapping of the exact location of where biodiversity impacts will be occurring in order to ensure effective and targeted application of mitigation measures. This should then be cross-referenced with CESMP mitigation measures.	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV/EPC ECoW	End of September 2024	Biodiversity constraints/mitigation mapping to be produced and included within updated CESMP, with updates reviewed and approved by Lenders.
6.5	***Habitat Restoration and Recreation Plan*** Implement the Habitat Restoration and Recreation Plan (HRRP) and undertake subsequent monitoring and maintenance of restored areas during both construction and operation until no net loss/net gain targets have been achieved.		EBRD PR6, IFC PS6, EP4 and best practice.	SPV to oversee and supervise both during construction and operation EPC ECoW to implement during constructions O&M contractor to maintain and monitor during operation	Implementation to commence by September 2024 and to continue through construction and operation as required (item to be updated periodically).	Progress on implementation included in regular monitoring reports
6.6	***Pre-construction mitigation measures*** Further information should be provided in the CESMP to explain why the lack of pre-construction mitigation for areas where construction had already commenced, does not represent a compliance issue.	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV and EPC ECoW	By September 2024	CESMP updates to be approved by Lenders
PS8/PR8	**Cultural Heritage**					
8.1	***Cultural Heritage Management Plan (CHMP)*** Ensure that cultural heritage consultations with potentially affected communities and relevant institutions in proximity to Project components in accordance with the programme set out on the CHMP. Prepare and include a cultural heritage constraints map within the existing CHMP. adhere to the avoidance strategy set out in the CHMP.	Compliance with Lenders' requirements	EBRD PR8, EBRD PR10, IFC PS1 and IFC PS8.	SPV to monitor EPC to implement (with the support of cultural heritage experts as required)	Consultations carried out throughout construction. Constraints map prepared prior to construction.	Consultation records on cultural heritage in line with SEP. Constraints map. CHMP Chance Find Procedure
8.2	***Chance Find Procedure (CFP)*** Ensure the Chance Find Procedure (CFP) is updated with a clear chain of authority and the relevant contact details of the person/organisation required to be notified in the case of a chance find.	Compliance with Lenders' requirements	EBRD PR8, IFC PS8 an best practice.	SPV to supervise EPC to update	Prior to construction.	CFP
8.3	***Archaeological Consultant*** Ensure a suitably qualified archaeological consultant (sub-contractor) is employed to undertake the proposed scheme of archaeological mitigation, including any archaeological evaluation of identified sites that cannot be avoided by the Project, as described in the CHMP (and CFP).	Avoidance or minimisation of impacts to identified archaeological sites, in compliance with Lenders' requirements and Turkish legislation.	EBRD PR8, IFC PS8 and National legislation	SPV to monitor EPC to implement (with the support of cultural heritage experts as required)	Prior to construction (phased, if required).	Archaeological evaluation reports prepared by consultants.

No	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	Ensure coordination and information dissemination is maintained with relevant competent authority.					
8.4	***Building Infrastructure Surveys to Historic Buildings*** Ensure EPC identifies built heritage receptors through completion of historic buildings survey (in conjunction with relevant competent authority) and carry out regular monitoring of vibration risks to identified receptors within 50m of significant sources of vibration that has been outlined in the Noise and Vibration Management Plan.	Avoidance or minimisation of impacts to identified archaeological sites, in compliance with lender requirements and Turkish legislation.	EBRD PR8, IFC PS8 and National legislation	SPV to supervise and monitor EPC to undertake (with the support of cultural heritage experts as required)	Prior to construction (phased, if required).	Building infrastructure survey reports.
PR10	**Information Disclosure and Stakeholder Engagement**					
10.1	***Stakeholder Engagement Plan (SEP)*** Implement SEP (including grievance mechanism), review, and update as necessary, when changes occur in the Project. Engagement and consultations carried out under SEP to: ▪ Prioritise engagement with vulnerable groups (i.e. affected women, children, house owners, businesses and their employees, land users) to inform about Project impacts and benefits such as job opportunities and livelihood restoration support. Engagement activities to consider special needs of certain impact groups. ▪ Ensure regular coordination with local authorities, NGOs, Worker representatives and elected village leaders and media as necessary.	Minimisation of reputational risks and impacts through inclusive, timely, transparent, and open dialogue with project stakeholders including project affected people, vulnerable groups, NGOs working with vulnerable groups etc.	EBRD PR10, IFC PS1, EP4 and best practice	SPV and EPC CLOs and O&M Contractor regular engagement activities. SPV and KGM to communicate land acquisition and livelihood restoration related rights and benefits to impacted PAPs and businesses.	Update SEP as and when necessary. Implement SEP including two grievance mechanisms throughout Project life. Update Stakeholder Engagement Registers monthly throughout Project life. Land acquisition and livelihood restoration related engagement to commence prior to land acquisition works and continue 1 year after RAP implementation finalised.	Updated SEP with supporting documentation (i.e. minutes of meetings etc.) Stakeholder Engagement Register (gender disaggregated and showing vulnerable group consultations). Records of project job opportunities announced Engagement and consultations reported in SPV's bi-annual E&S Reports under Stakeholder Engagement and Consultation section to IESC and Lenders. Employment records. Internal RAP monitoring reports.
10.2	***Community Grievance Mechanism*** Maintain and implement the grievance mechanism for external stakeholders. Ensure grievances are recorded, addressed and resolved in a timely manner to the satisfaction of the complainants as committed per SEP. Ensure availability of Project-specific grievance mechanism is communicated to all impacted people and interest groups. Communicate Project's zero tolerance policy against any form of retaliation towards people /CSOs raising concerns and complaints with employees, communities, local authorities and implement measures to avoid such cases. Disseminate information to local communities and GBVH service providers on the availability of the Project's GBVH reporting protocol separate from the project level grievance mechanism to sure safety and security of the survivors by respecting their privacy. SPV to immediately report to the EBRD's GBVH Focal Point on any GBVH allegations, grievances and incidents reported to them as per ESAP action 2.4.	Effective feedback and grievance management. Information dissemination and continuous engagement with affected stakeholders. Management and minimising risks of GBVH incidents	EBRD PR10, IFC PS1, EP4. IFC/EBRD/CDC Good Practice Guide on Addressing GBVH, for the Private Sector.	SPV to maintain grievance mechanisms with support of EPC and O&M Contractor SPV to update SEP regularly.	Effective immediately and throughout the Project.	SEP. Grievance records. Grievance mechanism details disseminated publicly in Project brochures, headmen offices, GBVH service providers and other communication platforms. Stakeholder Engagement Register. Minutes of meetings held with women and service providers. Immediately when a GBVH incident is received by SPV or EPC or contractor.

Appendix A

ABBREVIATIONS

Acronyms	Abbreviation
ADSB	Atradius Dutch State Business
AIIB	Asian Infrastructure Investment Bank
BAP	Biodiversity Action Plan
BoC	Bank of China
BOT	Build-Operate-Transfer
CAPEX	Capital Expenditure
CDC	CDC Investment Works
CESMP	Construction Environmental and Social Management Plan
CFP	Chance Find Procedure
CHMP	Cultural Heritage Management Plan
CLO	Community Liaison Officer
CoC	Code of Conduct
CV	Curriculum Vitae
DB	Deutsche Bank
DCMP	Design Change Management Procedure
EBRD	European Bank for Reconstruction and Development
EC	European Community
ECoW	Ecological Clerk of Works
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EHSS	Environmental, Health, Safety and Social
EP4	Equator Principles 4
EPC	Engineering Procurement and Construction
ESDD	Environmental Social Due Diligence
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESS	Environmental and Social Standards
EU	European Union
GAP	Gender Action Plan
GBVH	Gender-Based Violence and Harassment
GHG	Greenhouse Gas
GLAC	Guide to Land Acquisition and Compensation

Acronyms	Abbreviation
HR	Human Resources
HRRP	Habitat Restoration and Recreation Plan
H&S	Health and Safety
HSE	Health, Safety and Environment
ICD	Islamic Corporation for the Development of the Private Sector
IFC	International Finance Corporation
ILO	International Labour Organization
ISO	International Standard Organisation
IESC	Lenders Independent Environmental and Social Consultant
KGM	General Directorate of Motorways
KPI	Key Performance Indicator
LEP	Land Entry Protocols
LRP	Livelihood Restoration Plan
NGO	Non-Governmental Organisation
NTS	Non-Technical Summary
OESMP	Operation Environmental Social Management Plan
OHTL	Overhead Transmission Line
OHS	Occupational Health and Safety
OPEX	Operational Expenditure
O&M	Operation and Maintenance
PAP	Project Affected Person
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PSs	Performance Standards
PRs	Performance Requirements
RAP	Resettlement Action Plan
RoW	Right of Way
RSA	Road Safety Audit
SEP	Stakeholder Engagement Plan
SERV	SERV Swiss Export Risk Insurance
SCB	Standard Chartered Bank
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle



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