T.C. ULAŞTIRMA VE ALTYAPI BAKANLIĞI

EPC Contractor

REC ULUSLARARASI

PROJECT

NORTHERN MARMARA HIGHWAY SECTION 8 PPP PROJECT

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REC-İSG-ÇYS-KMO-PL-01

DOCUMENT TITLE

HEALTH AND SAFETY PLAN

TABLE OF CONTENTS

ABBREVIATIONS AND ACRONYMS IV
1. PURPOSE 5
2. SCOPE 5
3. REFERENCES 5
4. LINKS TO OTHER PLANS/PROCEDURES 8
5. ROLES AND RESPONSIBILITIES 9
6. OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT POLICIES 15
6.1. POLICY STATEMENT 15
6.2. ZERO TOLERANCE POLICY 16
6.3. SAFE DRIVING POLICY 16
7. KEY SAFETY RULES 17
7.1. HAZARD IDENTIFICATION, RISK ASSESSMENT AND MANAGEMENT 17
7.2. HOUSEKEEPING 18
7.3. PERSONAL PROTECTIVE EQUIPMENT 19
7.4. SLIPS, TRIPS AND FALLS 20
7.5. ADDITIONAL MANAGEMENT POINTS 21
8. EMERGENCY PREPAREDNESS AND RESPONSE PLAN 22
9. SAFETY PROCEDURES 23
9.1. TRANSPORTATION AND TRAFFIC MANAGEMENT 23
9.2. WORKING AT HEIGHT 24
9.3. LIFTING OPERATIONS 26
9.4. CONSTRUCTION MACHINERY AND CONSTRUCTION EQUIPMENT 27
9.5. CONFINED SPACES 28
9.6. TEMPORARY ELECTRICAL INSTALLATIONS AND EQUIPMENT 29
9.7. PERMIT TO WORK 30
9.8. FIRE PROTECTION 30
9.9. WORKSHOP SAFETY 31
9.10. OFFICE SAFETY AND SAFE SYSTEMS OF WORK 31
9.11. EXCAVATION SAFETY 32
9.12. MANUAL HANDLING 33
9.13. SAFE WORKING WITH MOBILE PLANT 33
9.14. BLASTING WORKS 34
9.15. HEALTH, FIRST AID AND MEDICAL TREATMENT 34

9.16. WORKING WITH CHEMICALS 34
9.17. THERMAL STRESS 35
9.18. DANGEROUS ENERGY CONTROL 36
9.19. COLOR CODING 37
9.20. FOOD PROCESSING, STORAGE, PERSONAL HYGIENE 37
10. ACCIDENT AND INCIDENT MANAGEMENT 38
10.1. IMPLEMENTATION 38
10.2. CLASSIFICATION OF ACCIDENTS AND INCIDENTS 38
11. TRAINING 40
12. INFORMATION AND DOCUMENTATION 42
13. ASSESSMENT, ASSURANCE AND IMPROVEMENT 43
14. MONITORING, VERIFICATION AND EVALUATION 45
14.1. DAILY H&S OBSERVATIONS 45
14.2. AUDITS ON CONFORMITY TO THE SYSTEM PROCEDURES 45
14.3. SUBJECT BASED PERIODIC ON-SITE INSPECTIONS: H&S INSPECTION FORMS 46
14.4. MONITORING POST-ACCIDENT / İNCIDENT REMEDIAL ACTIONS 46
14.5. H&S MEETINGS 46
14.6. FOLLOW-UP / REPORTING AND EVALUATION OF ACTIONS 46

ABBREVIATIONS AND ACRONYMS

EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health, and Safety
EHSS	Environmental, Health, Safety, and Security
EPA	Environmental Protection Agency
EPC	Engineering, Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practice
HSE	Health, Safety and Environment
IFC	International Finance Corporation
ISO	International Organization for Standardization
JHA	Job Hazard Assessment
JHSU	Joint Health and Safety Unit Services
KPIs	Key Performance Indicators
LOTO	Lock-out and Tag-out
LTA/LTI	Lost Time Accident/Injury
NMM	Northern Marmara Motorway
NOK	Next of Kin
OHS	Occupational Health and Safety
OJT	On the Job Training
PCB	Poly-chloro-biphenyls
PPE	Personal Protective Equipment
PPP	Public-Private Partnerships
PS	Performance Standards (IFC)
REC	REC International
ROW	Right of Way
SDSs	Safety Data Sheets
SMP	Security Management Plan
SPV	Special Purpose Vehicle (Nakkaş Otoyol A.Ş.)
WHO	World Health Organization

1. PURPOSE

The purpose of the Health and Safety (H&S) Plan is as follows:

- Identifying and eliminating or minimizing the causes of potential hazards to workers and communities during the construction stage of Nakkas Otoyolu activities;
- Establishing preventive and protective measures in a manner commensurate with the identified risks and impacts;
- Training workers on the aspects of occupational health and safety associated with their work;
- Documenting and reporting occupational accidents, diseases, and incidents to relevant local authorities and to Lenders;
- Establishing the need for emergency prevention, preparedness, and response plans in place;
- Complying with Turkish laws and lender requirements;
- Conducting contractors and subcontractors' due diligence;
- Managing natural hazards;
- Informing affected communities, local authorities and emergency services on the nature and extent of environmental and human health effects that may result from Project activities and emergency cases.

2. SCOPE

This plan covers all the construction works carried out in the Northern Marmara Highway Section 8 project, the project site, its surroundings, construction compounds and associated facilities, if there is any and the commissioning of the completed systems, and all parties (visitor, subcontractor, consultant, employer, supplier) operating within the designated project area for construction period. The plan covers the health and safety aspects REC as well as the sub-contractors working in the Project.

3. REFERENCES

- Local Regulations, Statutes, Communiqués, Laws to include:
    - Occupational Health and Safety Law No. 6331; Official Gazette (OG) Date/Number: 30.06.2012/28339;
    - Regulation on Duties, Authorizations, Responsibilities, and Training of Occupational Safety Experts; OG Date/Number: 29.12.2012/28512;
    - Regulation on Duties, Authorizations, Responsibilities, and Training of Workplace Doctors and Other Health Officials; OG Date/Number: 20.07.2013; 28713;
    - Regulation on Procedures and Principles of Health and Safety Training of Employees; OG Date/Number: 15.05.2013/28648;

- Regulation on Occupational Health and Safety Services; OG Date/Number: 29.12.2012/28512;
- Regulation on Occupational Health and Safety Committees; OG Date/Number: 18.1.2013/28532;
- Regulation on Use of Personal Protective Equipment in Workplaces; OG Date/Number: 02.07.2013/28695;
- Regulation on Health and Safety Signs; OG Date/Number: 11.09.2013/28762;
- Regulation on Occupational Health and Safety Risk Assessments; OG Date/Number: 29.12.2012/28512;
- Regulation on Health and Safety Measures to be Taken in Workplace Buildings and Extensions; OG Date/Number: 17.7.2013/28710;
- Regulation on Vocational Training for the Workers to be Worked in Dangerous and Very Dangerous Works; OG Date/Number: 13.07.2013 /28706;
- Regulation on Health and Safety Requirements on Use of Work Equipment; OG Date/ Number: 25.04.2013/28628;
- Regulation on Manual Handling Operations; OG Date/Number: 24.07.2013/28717;
- Regulation on Protection of the Workers from the Hazards of Explosive Atmospheres; OG Date/Number: 30.04.2013/ 28633;
- Regulation on the Protection of Employees from Noise Related Risks; OG Date/Number: 28.07.2013/28721;
- Regulation on Protection of Employees from Vibration Risks; OG Date/Number: 22.08.2013/28743;
- Regulation on Control of Dust; OG Date/Number: 05.11.2013/28812;
- Regulation on Machinery Safety; OG Date/Number: 03.03.2009/27158;
- Regulation on Health and Safety Measures for Working with Asbestos; OG Date/Number: 25.01.2013/28539
- Regulation on Protection of Buildings from Fire; OG Date/Number: 19.12.2007/26735;
- Regulation on Emergencies at Workplaces; OG Date/Number: 18.6.2013/28681;
- Regulation on Occupational Health and Safety in Construction Works OG Date/Number: 05.10.2013/28786;
- Regulation on Electrical High Current Facilities; OG Date/Number: 30.11.2000/24246;
- Regulation on Grounding in Electrical Facilities; OG Date/Number: 21.08.2001/24500;
- Regulation on Buildings to be Built in Disaster Zones, OG Date/Number: 14.07.2007/26582;
- Regulation on Prevention of Risks of Exposure to Biological Factors; OG Date/Number: 15.06.2013/28678;
- Regulation on Health and Safety Measures in Working with Carcinogenic or Mutagen Substances; OG Date/Number: 06.08.2013/28730;
- Regulation on Health and Safety Measures in Working with Chemical Substances; OG Date/Number: 12.08.2013/28733;
- Regulation on Health and Safety Measures in Working with Display Screen Equipment; OG Date/Number: 16.04.2013/28620;
- Regulation on Occupational Health and Safety in Temporary or Fixed-Term Works; OG Date/Number: 23.08.2013/28744;
- Regulation on Occupational Health and Safety Services to Be Carried Out by Employer or Employer Representative at Workplaces; 29.06.2015/29401;

- Regulation on Prevention of Major Industrial Accidents and Minimization of their Impacts; OG Date/Number: 02.03.2019/30702;

- International Standards
- EBRD PR4 Health, Safety and Security
- EBRD Briefing notes;
  - Briefing note BN01: Underground and overhead services, July 2021
  - Briefing note BN02: Safe excavations, July 2021
  - Briefing note BN04: Safe working with mobile plant, July 2021
- Rönesans Holding Zero Tolerance Policy
- REC Plans and Procedures

4. LINKS TO OTHER PLANS/PROCEDURES

This Plan is supported by the other plans/procedures of the Project-specific ESMS. Those of particular relevance to this procedure are as follows:

- REC-İSG-ÇYS-KMO-PL-13 Community Health Safety and Security Plan
- REC-İSG-ÇYS-KMO-PL-06 Emergency Preparedness and Response Plan
- REC-İSG-ÇYS-KMO-PL-15 Covid-19 Emergency Response Plan
- REC-İSG-ÇYS-KMO-PR-06 Accident and Incident Management Procedure
- REC-İSG-ÇYS-KMO-PR-17 Excavation Works Procedure
- REC-İSG-KMO-PR-10 Working At Height Procedure
- REC-İSG-ÇYS-KMO-PR-31 Housekeeping Procedure
- REC-İSG-ÇYS-KMO-PR-16 H&S Incentives Procedure
- REC-İSG-ÇYS-KMO-PR-07 H&S Discipline Procedure
- REC-İSG-ÇYS-KMO-PR-05 H&S Training Procedure
- REC-İSG-ÇYS-KMO-PL-12 Chemicals Hazard Management Plan
- REC-İSG-ÇYS-KMO-PL-16 Camp Management Plan
- REC-İSG-ÇYS-KMO-PR-04 Hazard and Risk Management Procedure
- REC-İSG-KMO-PR-20 H&S Leadership and Key Performance Procedure
- REC-İSG-KMO-PR 03 Procedure for Control of Life Critical Activities
- REC-İSG-ÇYS-PR-24 Machine and Equipment Procedure
- REC-İSG-KMO-PR-08 Fire Prevention and Protection Procedure
- REC-İSG-KMO-PL-07 Traffic Management Plan
- REC-İSG-ÇYS-KMO-PR-14 Personal Protective Equipment Procedure
- REC-İSG-KMO-PR-19 Electrical Safety Procedure
- REC-İSG-ÇYS-KMO-PR-11 Subcontractor Management H&S Procedure
- REC-İK-KMO-PL-01 Labour Management Procedure
- REC-İSG-ÇYS-KMPL-11 Quarry Management Plan
- REC-İSG-ÇYS-KMO-PL-03 Medical Waste Management Plan
- REC-İSG-KMO-PR-02 Permit to Work Procedure
- REC-İSG-ÇYS-KMO-PR-33 Operator Competency Assessment Procedure
- REC-ÇYS-KMO-PL-02 Waste Management Plan
- REC-İSG-KMO-PR-12 Cranes and Lifting Operations Procedure
- REC-İSG-KMO-PR-13 Confined Space Procedure
- REC-İSG-KMO-PR-15 Manual Handling Procedure
- REC-İSG-ÇYS-KMO-PR-09 H&S Monitoring, Verification and Evaluation Procedure

- REC-İSG-ÇYS-KMO-PR-01 Subcontractor Kick Off Procedure
- REC-İSG-ÇYS-KMO-PL-18 Blasting Management Plan

5. ROLES AND RESPONSIBILITIES

REC will ensure that adequate resources are continuously provided to meet the requirements of this plan and that the personnel responsible for the assessment of the duties and requirements of the H&S Plan are adequate in terms of training and experience.

Project Manager

- Planning, organizing, leading and controlling the project team in order to carry out all contractual activities.
- Supporting and advancing the Project Occupational Health and Safety management programs and in particular ensuring the commitment and motivation of the H&S teams under their responsibility, coordinating risk management, incident, investigation, emergency preparedness and other elements.
- Delivering a safe, environmentally friendly and cost-effective project.
- Selecting and approving large-scale subcontractors who have been properly evaluated and have received Occupational Health and Safety Training.
- Termination of subcontractor contracts in case of lack of H&S safety performance. Leading the subcontractor performance assessment scoring.
- Examining source requirements for subcontractors.
- Evaluating and confirming occupational H&S and competencies.
- Raising awareness about Health and Safety and developing project objectives in order to ensure the implementation of the H&S Plan

H&S Manager/Chief

- Encouraging all personnel working in the project area to implement the H&S rules and to ensure that plans and policies are created for implementation.
- Presenting and supporting the Project Manager, Site Manager and managers on the implementation and follow-up of the Project H&S Plan and procedures.
- Providing H&S Assurance to the project management team.
- Supporting the development and implementation of Emergency Response Procedures/Plans.

- Preparation of H&S Plans and Procedures according to project requirements and ensuring their revision according to changing conditions.
- Preparation and development of training plans to ensure H&S awareness.
- Planning H&S activities.
- Supervision of the execution of the project in accordance with local laws. Providing guidance to the Joint Health and Safety Unit Services (JHSU) company and informing the management about the fulfilment of legal responsibilities. JHSU are authorized by Ministry and has the required equipment and personnel. To provide occupational health and safety services to the workplaces by the companies who are operating according to the certificates of the public institutions and organizations together with the Turkish Commercial Code dated 13/1/2011 and numbered 6102.
- Leading the investigation of accidents and incidents.
- Ensuring that related H&S documentation is executed. Participating in H&S meetings and clearly notifying the corrective and preventive actions at these meetings.
- Leading the implementation of campaigns, posters, notices, danger hunts, etc. in order to increase the H&S perceptions of the workers.
- Presenting the necessary H&S equipment and materials to the project management during the project. Supervision of the appropriate procurement.
- Supervising the activities of the occupational health unit.
- Giving recommendations on measures to be taken against physical and chemical working environment damages.
- Organizing trainings and meetings in order to create and increase the awareness, attitudes and motivations of employees about H&S.
- Ensuring that all project personnel and contractors are aware of their responsibilities and assess these responsibilities in accordance with the Project H&S Plan). Providing training to REC and subcontractor staff for the introduction of the plan.
- Conveying the definitions of accident-incident-near miss to the project employees, ensuring that accident-incident-near miss is reported in accordance with the holding procedures.
- Preparing, implementing, and following the project environmental plans and procedures.

- REC H&S Manager must be fully aware of all the work done at the construction site and must attend all planning, progress meetings and regular meetings strictly. It is the responsibility of the REC H&S Manager and department employees to approve and develop risk analyses/work hazard analyses.

Department Manager/Chiefs

- Ensuring compliance with occupational safety rules and practices as stated in references listed in Section 3.
- Ensuring that job hazard assessments (JHA) and method statements are safe for the works under their control and their details are communicated to the relevant persons.
- As part of the risk assessment process, ensuring that the project team members responsible for taking preventive and protective measures regarding project operations are competent and familiar with their duties and responsibilities.
- Requesting extra training apart from the trainings given within the scope of training needs assessment on H&S issues, if necessary, for personnel at all levels under their responsibility.
- When assigned, ensuring that subcontractors work in accordance with project H&S standards, Lender's standards and approved safety statements for their envisaged works, monitoring their effectiveness and compliance with these rules.
- Monitoring the health, safety and security performance in their zones / departments and conducting regular construction site / department inspections regarding REC-İSG-ÇYS-KMO-PRO-09 H&S Monitoring, Verification and Evaluation Procedure. The monitoring programs will be daily, weekly and monthly each with scope and depth in proportion for ensuring monitoring of safeguards in place.
- Ensuring that people who use equipment, machinery and equipment are competent and legally authorised, have received the necessary training and, if necessary, have training cards and certifications.
- Enforcing and ensuring the use of personal protection equipment.
- Reporting, recording, investigating and participating in all kinds of accidents and dangerous events in contact with REC H&S Manager and ensuring that corrective measures are taken in order to prevent their reoccurrence.
- Performing weekly-daily (before-during) inspections of the work areas.

- Ensuring that violations within the work area / department under their responsibility are detected, addressed and all kinds of security inspection reports are promptly written.
- Acting in a way that sets an example to all workers on the project site in terms of H&S.

H&S Supervisor-Auditor-Inspector

- Being constantly aware of the changing conditions of the construction site so that a quick response can be made in case of an accident / incident at the construction site.
- Being aware of all kinds of hazardous substance use in the construction site area and having information about the precautions required in case of contact with these dangerous substances.
- Attending H&S meetings.
- Supporting employees in identifying hazards and assessing and eliminating risks.
- Stop unsafe acts and conditions.
- Warning and reporting people who do not comply with H&S instructions.
- Regulating traffic rules for vehicles, equipment, and employees.
- Ensuring that personal protection equipment is given to employees, their use and relevant records are maintained and monitoring compliance Ensuring that all necessary and all H&S related signages are placed in certain areas of the work area.
- Actively providing personnel with the necessary training on time and in accordance with job roles-based H&S training needs assessment and the Occupational Health and Safety training calendar. (Interactive or in-class)
- Entering the trainings provided in the data record on a daily basis and reporting to the H&S Manager on a weekly basis.
- Recording the personal information of the trained personnel (name, surname, date, name of the training, company name).
- Supporting the H&S Manager in the practical implementation of the H&S Plan and supporting documents.
- Organizing, implementing and participating in Occupational Health and Safety campaigns (published by the Holding’s H&S Department).

Site Engineers

- Planning and implementing all the activities carried out in a way that minimises risks and are safe for employees, the civilian population close to the area, property and equipment.
- Implementing the Project H&S Plan H&S and all related H&S procedures.
- Complying with and implementing H&S instructions specific to the construction site.
- Participating in the H&S awareness trainings assigned to them.
- Supporting the team, they work with to participate in trainings planned to increase H&S awareness.
- Making recommendations on H&S.
- Attending H&S Meetings at the work site if necessary.
- Reporting all kinds of dangerous conditions, accidents, incidents, violations of rules, etc. regarding Project Occupational Health and Safety management.
- Monitoring the employees regarding their compliance with the Project H&S instructions.
- Ensuring that hazards associated with the work they are overseeing are identified and were possibly eliminated, when this is not possible appropriate controls are in place prior to commencing work.
- Stopping the work if it is not safe. Warning the team not to work until conditions are safe to do.

Scaffolding Supervisor

They are responsible for the safe installation and dismantling of the scaffolds used in the project site in accordance with their intended use, with daily and weekly controls and inspections, recording inspections to confirm safety, placing scaffolding into and out of services, if necessary, positioning of safe for use signs / scaffold tags to confirm scaffolding is safe for use and for filling in the relevant forms and recording them.
They are responsible for immediately reporting the detected nonconformities to the H&S Manager/Chief and stopping the work if necessary.

Traffic Safety Officer

The responsibilities of the Traffic Safety Officer are as follows:

1. To lead the preparation of the special Traffic Management Plan according to the project conditions, to submit the plan to the approval of the Project / Operations Manager,
2. Leading risk assessment studies on Traffic Management,
3. To ensure that the flagmen, operators and drivers working in the project are familiar with the requirements of this document and to provide them with training on traffic safety practices, to take a priority role in creating and updating the training content,
4. To carry out planning activities that will reduce traffic loads by meeting with the responsible of activities that will cause vehicle – equipment traffic in the project at regular intervals,

Lifting Operations Officer

They are responsible for the daily and weekly inspections of the lifting equipment assigned by the REC H&S Department and the safe execution of lifting operations. Lifting plans will be prepared for complex lifting operations by the team stated in REC-İSG-KMO-PR-12 Cranes and Lifting Operations Procedure. The daily checks performed will be recorded and delivered to the H&S Documentation officers.

Employees

The employee responsibilities include:

- Stopping the work if it is not safe.
- Working in accordance with the Project H&S rules for occupational safety in such a way as not to harm themselves and their colleagues.
- Participating in H&S trainings and applying what they have learned in the field.
- Reporting unsafe situations to the supervisor immediately and not continuing to work at that time.
- Reporting all kinds of accidents, incidents and near misses to their supervisors.
- Reporting unsafe equipment (e.g., safety features have been removed) and all kinds of equipment damage to the relevant supervisors.
- Helping to create a safe and clean workspace.
- Not using/maintaining repairing machinery and equipment without authorization.
- Working in accordance with the job description.
- Using personal protective equipment fully and correctly.
- Paying attention to and complying with the warning and signage systems.
- Participating in vocational trainings.
- Being of reasonable behavior and setting an exemplary personality.

6. OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT POLICIES

6.1. Policy Statement

RÖNESANS HOLDİNG	OCCUPATIONAL HEALTH AND SAFETY POLICY	Doc. No.	HOL-HSE-POL-001
		Rev. No.	03
		Date	October 2020

As RÖNESANS Holding A.Ş., its Subsidiaries and Affiliates, we believe that any harm to employees, stakeholders and anyone we interact, which may occur during our operations, can be avoided. Accordingly, we regard Occupational Health and Safety (OHS) as one of the core values of our corporate culture.

RÖNESANS considers occupational safety as a conscientious responsibility, not as an obligation. Our ultimate responsibility is to ensure that each of our employees from various nationalities from many parts of the world, complete their job safely and return to their homes healthy.

Our company has adopted the OHS policies and risk control strategies based on the following core principles. All our employees, starting from top management, are committed to being a part of RÖNESANS within the framework of the following principles:

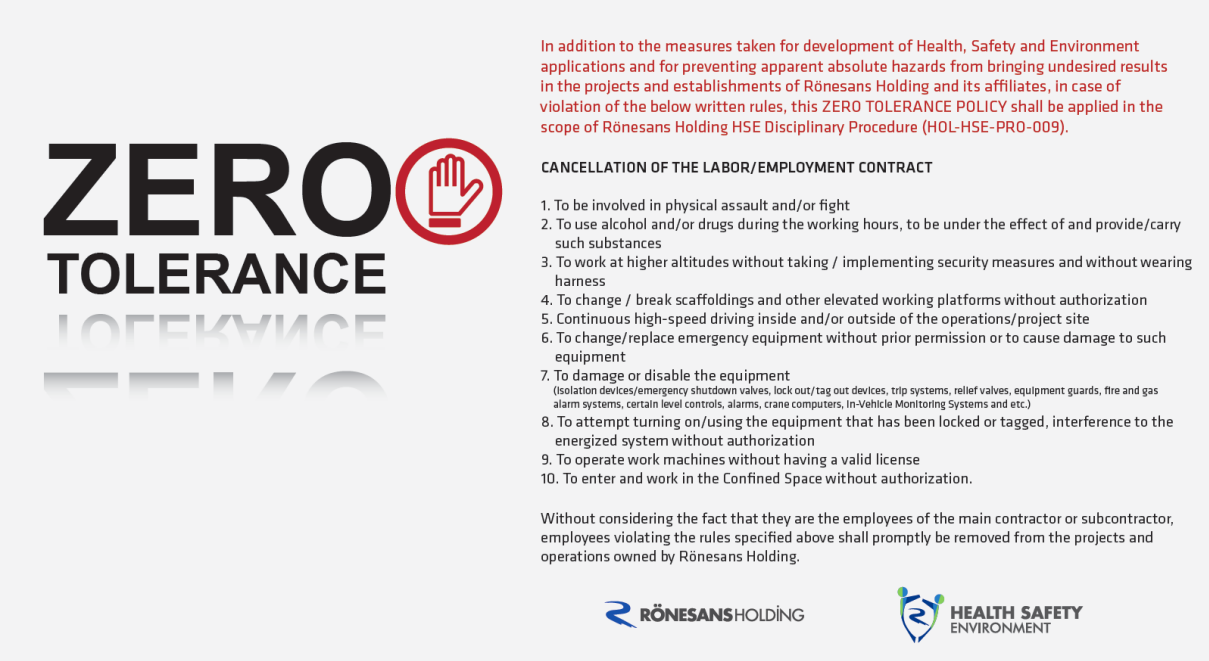
- Working with managers who act as role models and embrace the occupational safety aspects,
- Establishing the mode of management based on continuous improvement and preventive risk management,
- Providing necessary resources (people, method, procedure, equipment, budget, and training, etc.),
- Encouraging, expanding and rewarding good practices,
- Addressing the occupational safety starting from the planning and design phase, and incorporating the aspects thereof into work execution methods,
- Complying with the expectations of the employer and all applicable legal and other requirements of the countries in which we operate,
- Creating safe environment for all our stakeholders (employers, employees, partners, subcontractors, suppliers, visitors, local people, etc.),
- Determining and taking precautions by planning for crises and emergencies that might occur,
- Implementing safe working methods in order to prevent the occupational accidents, injuries, occupational diseases and harm to the people, and ensuring sustainability thereof,
- Identifying, and eliminating or mitigating, hazards and risks,
- Setting our goals and clearly explaining such goals to our employees at all levels, to the subcontractors and business partners,
- Identifying and delivering OHS training required by our employees,
- Ensuring engagement of our employees in occupational safety aspects of the work, receiving the feedback and suggestions thereof,
- Involving the subcontractors into the system and monitoring their OHS performance,
- Carrying out audits on regular basis,
- Monitoring and evaluating the set objectives, and
- Expand the lessons learned and good practices across all our fields of operation

We will implement our commitments in line with this policy in all our fields of operation, and we will monitor and develop continuously.

Rashit Nevzat Manav
President of Infrastructure Affairs
October 2020

İpek ILICAK KAYAALP
Chairman of the Executive Board
October 2020

6.2. Zero Tolerance Policy



6.3. SAFE DRIVING POLICY

Our aim is to remind drivers of possible types of accidents that may occur while driving, to train them how to avoid these accidents, to avoid accidents by reminding once again what they will do to avoid these accidents and how to use vehicles safely, with a management and control mechanism planned and structured before the project. And keeping risks under control.

For this reason, REC employees, subcontractors and suppliers coming from outside the construction site must comply with our “Safe Driving” Policy, which is stated below.

To manage vehicle traffic safely at our construction site;

- We follow the legal documents of all vehicles and keep the current documents in the vehicle.
- Vehicle users have legal authorization certificate (Driver’s License, SRC, Psychotechnics).
- We follow the inspection and periodic maintenance of the vehicles and use the vehicles in suitable condition.
- We abide by the speed limits and signaller/flagman instructions within the construction site.
- We do not drive after taking alcohol and drugs that will prevent driving.
- We have a first aid kit and fire extinguisher in all vehicles.
- We track all vehicle accidents, investigate and report root causes.
- We take all necessary actions to prevent the recurrence of vehicle accidents.
- We explain the safe driving rules to all employees at the construction site before starting work.

We will ensure that risks are minimized with Safe Traffic Management by applying this policy within our entire project site.

Selim SÖNMEZ

Project Manager

7. KEY SAFETY RULES

7.1. Hazard Identification, Risk Assessment and Management

REC-H&S-EYS-KMO-PRO 04 Hazard and Risk Management Procedure will be followed.

For project planning, design, mobilization, construction, commissioning and delivery phases, to identify major hazards and risks arising from the project region, type and construction methods, preliminary risk analysis will be held.

For project planning, design, mobilization, construction, commissioning and delivery phases, to identify the hazards that may occur during construction and to determine and implement the measures to be taken based on risk assessment, risk analysis will be held.

At the beginning of the project, upon major organizational changes, major changes in key operations (for example, during transition from civil works to commissioning process, with a risk analysis workshop, senior management will review major risks and measures and planning for preliminary preparation to be conducted by project senior managers (Headquarter and project site).

For mobilization, project implementation, process commissioning, de-mob process and delivery processes, hazards will be identified step by step and preventive actions will be determined with Job Hazard Analysis (JHA). The measures considered will also cover the emergency measures and rescue measures.

For project implementation, commissioning de-mob and delivery, TRIC(Task Risk Identification Card) process is implemented to identify job-specific hazards in the work area, by involving the workers to the process. All workers must take part in the TRIC card process, and the process is implemented on daily basis at the beginning of the construction activities, and on weekly basis during routine activities (such as workshop, cafeteria, etc.).

The subcontractor shall provide trained and qualified personnel to facilitate risk assessment.

Project Specific Safety Hazards

- Abrasive cleaning
- Access roads
- Communication i.e., equipment reports, meetings and common language among all Contractors and subcontractor
- Driving and driver fatigue, vehicle roadworthiness and management
- Emergency response
- Excavation
- Explosives handling and use.
- Fire prevention and fire fighting
- Lifting, handling and cranes

- Road transport
- Scaffolding
- Storage of fuels and chemicals
- Testing
- Welding and cutting
- Working at heights
- Working below ground level
- Working near third party underground installations (gas, crude oil pipelines, electric cables etc.)
- Working in confined spaces and trenches
- Working in hazardous areas (steep slopes etc.)
- Working with gas
- Working with or near high voltages

Project Specific Health Hazards

- Abnormal climate conditions
- Accommodation
- Catering and messing facilities.
- Food and water quality monitoring
- Infectious diseases
- Wild animals and insects
- Medical service availability
- Noise control
- Security

7.2. Housekeeping

REC-H&S-EYS-KMO-PR-31 Housekeeping Procedure will be followed.

Good housekeeping will apply to all sections of the Site including roads, walkways, temporary buildings and the work areas. REC will install suitable and sufficient pedestrian access to all areas of the sites that personnel are required to access.

Materials and Construction Equipment not being used will be stored safely in such a way that they will not obstruct other Site activities or present a potential for harm to site personnel.

Roads and walkways will be maintained clean, and every effort shall be made to keep mud, slush and other slippery substances off roads and walkways.

Cables, water and air hoses shall be placed where they cannot be damaged, and where they cannot cause damage or injury.

If placed in roadways or pipe ways, the cables and hoses will be placed in a protected trough or suspended above the road or pavement surface and conspicuously tagged and marked.

7.3. Personal Protective Equipment

- All employees in the project (including subcontractor employees) will be provided with basic mandatory PPE and PPE that will protect them against the risks associated with the work they carry out. The PPE to be used will be determined by the work-specific risk assessment.
- In the project, the visitors will be provided with mandatory PPE that must be used in the designated areas during their visit and their use will be clearly stated in the visitor trainings.
- REC Subcontractor employees and visitors must use PPE.
- All employees will be informed about the use of PPE in the orientation training.
- PPE delivered to all employees and visitors, including subcontractors, will be recorded and checked at regular intervals.
- The project will develop and implement a written procedure and job/position-based PPE matrix for the purchase, selection, use, storage, maintenance of PPE.
- To make the safest and most cost-effective choice in PPE selection, the Procurement Department will not purchase without the approval of the Project H&S Manager.
- In cases where the PPE will be supplied by the subcontractor, the relevant procedure for the selection of PPE will be shared with the subcontractors and they will be warned to supply them in accordance with the standards. The compliance of the personal protective equipment supplied by the subcontractors with the standards will be checked while the warehouse is accepted.
- The PPEs, which are required to be used as a minimum in the areas determined in the project, are as follows.
    - Work clothes and gear in line with H&S regulations and REC requirements. The H&S regulations require the PPEs are identified through risk assessments conducted specifically for site activities which will potentially be more extensive than the REC requirements stated below.
    - Hard hat (EN 397/ANSI 289.1-2003 or equivalent)
    - Glasses (EN 166 or equivalent)
    - Reflective Vest (EN 340 I ANSI 103 or equivalent)
    - Steel/composite toe safety shoes (EN 20345 S3 I ANSI 241-1991 or equivalent)
- It will be protected from the risks that may arise depending on the method of construction of the work carried out. To provide this protection, additional PPE must

be determined in the project and included in the written program, to the PPEs that are required to be used in the project as a minimum.

- PPEs will be selected and provided to protect all personnel and visitors in the project from the following basic conditions.
    - Inhalation and respiratory hazards,
    - Hazards that may occur with skin contact.
    - Mechanical injuries and hazards
    - Construction H&S hazards (material falling, nail sinking, etc.)
    - Environmental hazards
    - Radiological hazards
- In cases where additional supplements are required for respiratory protection, additional planning will be done.
- PPE found to be damaged will not be used. Damaged, worn-out PPE will be promptly replaced with undamaged, unworn and functional ones. Personal protective equipment provided to employees is always in an effective working condition, cleaning and maintenance is carried out, and it will be replaced with new ones if necessary.
- Personal protective equipment will be checked monthly and color coding will be applied. Equipment that is not suitable during the inspection will be quarantined.
- Personal protective equipment that has expired will be collected and disposed of in accordance with waste management, as specified in the relevant procedure.

7.4. Slips, Trips and Falls

- The floor coverings and base cover in the project will be intact, dry and as flat and non-slip as possible, and there will be no hazardous slopes, pits and obstacles.
- Anti-slip tapes will be applied on stair steps.
- Precautions will be taken to prevent chemical spills. Any spillage must be cleaned up promptly.
- Measures will be taken to prevent slipping at wet floors or icing on walking, access, passage and traffic roads.
- In the project, any openings on the ground will be backfilled promptly with solid material to prevent falling. The openings will be fenced until backfilling occurs.
- Adequate lighting will be furnished in walkways, accessways, passages and traffic roads and work areas.

- The cables laid in the work areas will be routed along the edges of the walls, from overhead hangers, or over tripods so that they do not come into contact with the ground to prevent tripping.

7.5. Additional Management Points

REC will take full responsibility for the work site and will:

- ensure the co-ordination of all Contractors and subcontractor using construction sites.
- ensure that all personnel comply with the H&S plan and any site-specific rules.
- take steps to ensure only identified, trained and authorized personnel are allowed on sites, camp premises and vehicles.
- display suitable notices to remind employees of H&S requirements.
- supply the Company Representative with any information that he/she may require.
- ensure that all employees and subcontractors are properly behaved and managed, so that no disturbance is caused to local residents, their property or to any public facilities.
- designate responsibilities for field personnel to include:
    - compliance with specification
    - implementation of H&S plan
    - H&S issues
    - social and security issues

Prior to commencing any site work, H&S management systems commensurate with the identified risks shall be in place.

REC will comply with project-specific H&S procedures and plans.

At intervals set forth in the H&S plans, the subcontractor shall report to the REC H&S Manager on performance against the H&S Plan targets and progress on any corrective actions being taken.

All managers and supervisors shall be trained in the requirements and supplied with a copy of the H&S plans, plus procedures relevant to their area of responsibility.

The subcontractor shall notify REC both orally and in writing immediately (within 24 hours) after discovering, or receiving a report relating to, any of the following events that may occur under this Contract.

- The release of a Hazardous Material
- Any violation by subcontractor or any of his subcontractor, of an H&S Regulations or any of REC's/Subcontractor's H&S requirements
- The receipt by the subcontractor or any of his subcontractor of notice of any alleged violation of any H&S Regulations or of any action on the subcontractor by any governmental authority

- Any inspection or notice of inspection of work or a work site related to the Contract by any governmental authority.
- Any proceedings being commenced or threatened, alleging any failure by subcontractor or any of his subcontractor to comply with any H&S Regulations or alleging potential responsibility for the release of a Hazardous Material
- The death of any employee of subcontractor or his own subcontractor or third party while performing work under the Contract
- The injury of any employee of subcontractor or his own subcontractor or third party while performing work under the Contract where a lost work time accident/incident (LTA/LTI) has occurred.
- Any suspected personal health issues
- Any failure to comply with the Health and Safety Manual
- Any incident as defined in Incident Investigation, as defined in Safe Systems of Work

The subcontractor shall stop any activity immediately if, in the opinion of the REC Representative, the activity:

- Is being conducted without an adequate risk assessment or appropriate permit to work
- is not in accordance with the H&S plan and approved procedures.
- is not in accordance with the Project-REC H&S requirements stated in this plan.
- is not in accordance with applicable laws.
- cannot be conducted in safety as a result of adverse weather conditions.
- is perceived as unsafe, has the potential to cause an incident, any other H&S related issue.

The activity shall not re-start until agreement from the REC Representative has been received. All costs or delays involved with the stoppage shall be to the subcontractor's account.

Further, the safety culture developed and implemented by the subcontractor shall ensure than any individual member of the workforce, recognizing an unsafe act or situation, shall cause the activity to be halted or the situation to be corrected, without fear of penalty or dismissal.

8. EMERGENCY PREPAREDNESS AND RESPONSE PLAN

REC and Subcontractors shall develop an Emergency Preparedness and Response Plan addressing all eventualities at the work site(s) including, for example, fire, explosion, collapse of structures, serious injuries, medivac, spillage of chemicals and exposure to harmful or toxic substances in line with REC-İSG-ÇYS-KMO-PL-06 Emergency Preparedness and Response Plan.

The plan must be developed in consultation and co-operation with the Turkish authorities and emergency services and will integrate with REC-İSG-ÇYS-KMO-PL-06 Emergency Preparedness and Response Plan.

The plan will also address response to natural occurrences such as lightning, storms and floods and other important security issues such as civil unrest or terrorist activity.

The plan must detail the emergency organizations, resources and equipment, identification and testing of equipment and facilities, the responsibilities of key personnel, communications to be made from where assistance will be sought, site evacuation, and rescue of persons. It will include a medical emergency plan for dealing with injuries.

Periodic drills, including liaison with external organizations, training and incorporation of lessons learned, shall form part of the plan.

The subcontractor plan shall be approved by REC.

REC and subcontractors shall provide and maintain all equipment resources and facilities required by the Emergency Preparedness and Response Plan.

REC and Subcontractors shall maintain a qualified Emergency Response Team, available continuously 24 hours a day throughout the Contract term.

REC and subcontractor shall provide and prominently display internally and external to the boundary, at each construction camp and worksite a listing of subcontractor's key personnel, including persons responsible for the Emergency Response Team, complete with contact details and telephone numbers. The displayed information shall include which of the personnel are available on a 24-hour call basis.

REC and subcontractor shall collect and maintain a database of Next of Kin (NOK) for all REC, subcontractor's and subcontractor' personnel. This data must remain accessible in the event of an emergency to enable the appropriate response to be carried out in a sensitive manner.

9. SAFETY PROCEDURES

9.1. Transportation and Traffic Management

REC-İSG-KMO-PL-07 Traffic Management Plan will be followed.

REC and subcontractor vehicles or fleets of vehicles (owned or leased), will have GIIP arrangements to manage road and traffic risks and will provide training to workers on driver and vehicle safety.

REC will ensure regular maintenance of all Project vehicles at authorized dealers and keep related records.

- During construction, pedestrian and vehicle roads will be separated from each other with hard barriers, including emergency access to all work points. Within the scope of

on-site traffic management in the project, current pedestrian and vehicle routes will be shown on the drawings and shared with employees during site induction (MEPI plans have been created)

- Risk assessment will be made especially at the intersections of civilian and construction site traffic, and flaggers will be placed at these locations for guidance.
- Existing access roads and the road construction right of way (RoW) alignment will be used where possible before consideration of opening up new temporary access roads;
- Drivers using the project vehicles (suppliers, trucks carrying materials to the project, project field staff vehicles, etc.) will only use the routes notified to them during induction training. Within the scope of transportation and traffic management, job-specific and location-specific risk assessments will be made. In addition, road risk assessments will be made for access roads in the project.
- There will be traffic signs stating the traffic rules clearly and comprehensibly at the project site and at the intersections with civilians.
- Traffic management and Safe Driving training will be given to drivers.
- Hours of operation for specific equipment or operations (e.g., trucks or machines operating in or passing through community areas) will be limited;
- A grievance mechanism will be implemented prior to commencement of the construction phase, with all relevant staff fully cognizant of their roles in the grievance resolution process so that quick and effective response is provided to the concerns raised by local stakeholders; and
- Speed limit of 50 km/h will be implemented for trucks while travelling to and from construction sites;
- The speed limit in build-up areas and on village roads of poor condition speed will be reduced to 30 km/h;
- Slow driving rules in villages (e.g., 30km/h) will be implemented, particularly near sensitive use areas which will be identified (at least one month) prior to start of construction related activities;

9.2. Working at Height

REC-H&S-EYS-KMO-PR-10 Working at Height Procedure will be followed.

1. In the planning of the works at height, it is planned that the works to be done at the height will be carried out in lower places as much as possible. In planning, a hierarchical approach will be followed in which collective protection measures instead of personal protective

measures, and measures to prevent falls instead of measures to minimize height and the consequences of falls will be taken into account.

2. Before starting work activities, primary fall protection systems (railings, etc.) will be installed. The main way to achieve safe working conditions when working at height is to provide adequate access and entry-exit arrangements and suitable work platforms at the workplace.

3. Risk analysis is mandatory for working at height. (JHA) Following the assessment of risks, the methods and precautions to be followed while working at height will be conveyed to the personnel. All work at height must also consider weather conditions that may endanger safety. The weather forecast will be published daily to the project site by the project manager assistant. With this publication, plans for the safe management of lifting operations and work at height will be shaped.

4. It is mandatory to prepare a rescue plan for all work at height. Prepared rescue plans will also be included in emergency plans.

5. Personal fall arrest equipment must be used in all work at height. (Double lanyard parachute type seat belt)

6. Personnel who will work at height will be given training to increase their competencies on the subject.

7. Personal fall arrest systems will only be determined and supplied by competent persons.

8. Competent/trained persons will design, select, install and check the horizontal lifelines and connection points at regular intervals.

9. Personal fall arrest systems will be checked before each use. The use of damaged equipment is prohibited.

10. The use of fall protection equipment and systems for any other purpose is prohibited.

11. The suitability of the personnel who will work at height will be approved by the physician at the time of employment.

12. All work at height in the project site is subject to a work permit.

13. It is mandatory for the personnel to use standard personal protective equipment while working at height.

Depending on the work area and the nature of the work, one or more of the following fall protection measures will be used:

- Railings
- Safety Net
- Personal fall arrest systems
- Area limitation systems

- Positioning systems

Scaffolding

No one may order or bring scaffolding on site without authorization from Construction Manager.

Scaffolding must be inspected before use and every seven days thereafter, and after inclement weather for external structures, by a competent person.

The Construction Manager shall be responsible for the provision of recognized scaffolding inspection services.

Ladders

All ladders and steps will be inspected and recorded. Department Managers / Chiefs are responsible for maintaining this register and arranging regular inspections.

H&S Manager shall be notified of the purchase of any ladders or steps, and these shall be inspected and registered before use.

Only ladders and steps which are registered and have identification numbers are approved for use.

It is preferable not to use aluminium or steel ladders and steps when carrying out any electrical work or where they may be liable to come into contact with unprotected electrical conductors.

Before use, ladders and steps will be visually checked for any obvious signs of damage. If serious faults are evident the item shall be marked "Not to be Used".

9.3. Lifting Operations

REC-İSG-KMO-PR-12 Cranes and Lifting Operations Procedure will be followed.

For all lifting operations to be carried out, safe working methods will be determined, risk assessment will be made, and control measures will be taken to minimize risks. Removal operations will be planned to consider the holding, creditor and legal requirements. For all lifting operations, work-specific hazard analysis and risk assessment and obtaining a work permit are mandatory.

Failure to comply with safe lifting conditions and requirements is risky for all workers. All managers in the Project must ensure that lifting operations are carried out effectively by ensuring safe lifting conditions and requirements in the work area for which they are responsible.

The lifting operations program shall apply to all lifts by mechanical means at any work site;

- Lifting operations to be carried out in the project will be carried out under the control and management of the lifting works foreman authorized by the project.
- Competent lifting supervisor will determine the type of load to be lifted and choose the lifting equipment and apparatus to be used accordingly.
- All lifting equipment must be certified by accredited organizations and/or third parties in accordance with local legislation.

- All lifting equipment must be well maintained and in working order. Periodic inspections must be performed completely in accordance with local legislation. Lifting vehicles that do not have the latest maintenance record (for the last 3 months) or have any missing documents within the specified period are prohibited.
- Critical, complex lifting operations heavier than 10 tons will be subject to the lifting plan.
- Lifting shall not be done with any machinery and equipment that is not designed as a lifting device.
- The lifting vehicle is allowed to lift weight corresponding to 85% of its lifting radius capacity. Lifts above 85% capacity are not allowed.
- Anyone who observes an unsafe lifting operation has the right to stop the work,
- It is forbidden to carry people with the load.
- For lifting tools and equipment provided by third parties, the project will establish a control system for entry to the work area, installation, use, maintenance and dismantling, inspection, and control for integrity and compliance. The use of tools and equipment that do not meet the requirements is prohibited. (Before entering the project site, documents related to the equipment are requested and checked. After the control, the equipment is visually checked before entry and accepted to the site.)
- Lifting operations will be stopped at a wind speed of 45 km/h. By taking into account the shape, characteristics and dimensions of the load to be lifted, the lifting operation can also be stopped at lower wind speeds than the calculations in the lifting plans.
- Lifting operations with lifting equipment cannot be started until the following conditions are met:
- If the evaluation of the lifting has been completed, the lifting method has been determined by the competent person of the lifting vehicle.
- Lift truck operators must be trained and certified and/or licensed for the equipment.
- Slinging being performed by a competent person.
- Having a minimum maintenance record of the last 1 year of lifting vehicles and equipment, having periodic controls (provided that the date of the report does not exceed 1 year)
- The load not exceeding the dynamic and/or static capacity of the lifting vehicle.
- Any lifting equipment (such as ropes) on the lifting vehicle being ready for use and undamaged.
- Before each lifting, visual inspection of the lifting vehicle and equipment by a competent person with the specified daily maintenance control form

9.4. Construction Machinery and Construction Equipment

REC-H&S-EYS-KMO-PR-24 Construction Machine and Equipment Procedure will be followed.

- The construction machinery and construction equipment to be used in the project will be suitable for the work to be carried out. Construction equipment is used only in works and conditions suitable for the design and manufacturing purpose.
- For the use of construction machinery and construction equipment, operators with a minimum of 3 years of experience, who have the necessary license and/or certificate

related to the construction machinery and work equipment, are allowed to use it as per the project local legislation.

- Construction machinery and construction equipment will not be used other than the purposes determined by the manufacturer and defined in the project local legislation.
- All construction machines will have a seat belt, and operators must wear it during operation.
- The use of construction machinery and work equipment over the age of 7 is risky. It is allowed on the condition that the periodical control of construction machines over 7 years old is done before they start working at the construction site. It cannot start work with its current periodic inspection. The project will be taken to the site by making periodic inspections under the supervision of machinery equipment and H&S unit.
- Before using all construction machines and construction equipment in the project, the relevant documents will be submitted to the H&S unit. Physical controls of construction machinery and construction equipment with appropriate documents will be provided and cards will be printed. Machines and equipment that do not have a user card will not be allowed to be used.
- There will be no one in the turning area of all construction machines. When working with construction machinery and equipment, the approach distance will not be closer than 25 metres.
- There will be trained flaggers and slingers directing the construction machines.
- All construction machinery and equipment will be subject to daily/weekly/monthly checks within the periods specified in the relevant procedure.

9.5. Confined Spaces

REC-H&S-EYS-KMO-PR13 Confined Space Procedure will be followed.

Confined space means any enclosed or partially enclosed space or trench having restricted access or egress, a potential for a hazardous atmosphere and which due to its nature may form a trap and become a life-threatening environment.

Such spaces are usually not designed or intended for human occupancy. They include large tanks, vessels, separators, silos, ducts, sewers, pits, holes, flues, manholes and voids. They also include any space in which dangerous contaminants can accumulate and ventilation is restricted e.g., excavations, trenches (normally deeper than 1.2 meters or 4 feet), sumps, draw pits and culverts and any other poorly ventilated areas.

- Risk assessment required prior to entry into confined space.

- Authorized Gas Tester makes tests for oxygen levels and toxic gases prior to entry and during work duration.
- Buddy system will apply person to look-out for each other.
- Dedicated person will always be present when the space is occupied and will be located outside the confined space, who is able to immediately call for assistance and who will inspect and monitor the confined space for the presence of gases and other hazards. e.g., potential trenches collapse due to excessive ground water
- The person entering the confined space shall be attached to a lifeline.
- If any of the listed hazards are present, entry is not permitted.

9.6. Temporary Electrical Installations and Equipment

1. The electrical equipment/circuit to be worked on/next to will be de-energized.
2. All electrical equipment/circuit shall be considered as live (energized), even if it is not in working condition, until it is de-energized and determined to be de-energized.
3. A competent and expert "Electrical Supervisor" will be assigned to each project, to install, control and maintain the electrical installations.
4. Materials related to electrical work will be selected by a competent Electrical Engineer and comply with international standards. The installation of unsafe, high-quality materials that may cause electric shock or fire risk will definitely not be allowed.
5. All parts of electrical installations must be manufactured, assembled and protected in such a way as to prevent electric shock, fire and explosion.
6. All subcontractors must ensure that the list of electrical equipment to be used in the work area is forwarded to the Electrical Department and H&S Department for pre-mobilization electricity distribution planning.
7. Electricity distribution in each area will be made with an insulator that can cut all currents from the conductor at once, it will be designed with this quality and it will be able to be locked in the "closed" position, not locked in the "open" position. Electrical installations / switch units are locked with only access to the switches by the electrical expert.
8. Electricity will be configured in such a way that in case of any emergency, the electricity in all power supplies and conductors can be cut off.
9. All electrical appliances and electrical outlets must be marked to indicate their purpose and voltage.
10. Control, repair, and maintenance of electrical equipment will only be done by authorized and authorized persons. All work to be done in places where there are

strong current arrangements will be done under the responsibility, supervision of a licensed electrical engineer.

11. Even if competent, personnel will not be sent to malfunctions alone, at least 2 or more personnel will be provided to intervene in the malfunction. (The rule of not working alone in the project area, in general, will also be taken into account for electrical works)
12. Personnel will not be assigned on or near loaded power lines, regardless of voltage, without adequate occupational safety precautions.
13. Protective systems and equipment in accordance with the ATEX Directive will be installed and used in places where explosive atmospheres are likely to occur.
14. It is mandatory to use all work-specific PPE in all electrical works. The work clothes, maintenance tools and PPE required for the maintenance and repair personnel will be delivered with a report in advance. It will be ensured that they know how to use the maintenance and repair work tools that they will use.

9.7. Permit to Work

REC-H&S-EYS-KMO-PR-02 Permit to Work Procedure will be followed by REC and subcontractors. It is an authorization document approved by REC supervisor or manager that specifies the necessary precautions and conditions under which potentially dangerous or interfering activities can be carried out. It is also a written document authorizing the designated persons to carry out the work within the specified time frame and area. It is a formal written system that provides control over certain types of work that are identified as potentially hazardous. Based on the risk analysis, it defines how the work for which permission is requested will be done, includes general information about the work to be done, site preparations, occupational safety measures and requirements, and the signatures of the relevant persons. At the same time, it is a system that prevents occupational safety experts from starting work without seeing the working area. Following the completion of the form (the form is filled by the trained subcontractor/REC personnel and signed by the subcontractor and REC technical personnel), the occupational safety specialist cannot start the work without checking the work area and printing the seen stamp on the form.

The procedures and principles of work performed with the work permit system will be determined by reference to the Work Permit System Procedure.

9.8. Fire Protection

Debris will be cleaned regularly, regular inspections of the work areas and buildings to detect and eliminate fire hazards or the potential sources of fire will be carried out and combustible material will be safely stored, handled and used.

Fire extinguishing training will be held by competent H&S personnel for subcontractors for a passive or active response to firefighting.

REC will locate fire extinguishers, suitable for the various classes of fire in line with international standards.

Regardless of the minimum number of fire extinguishers deemed to be necessary, additional extinguishers will be placed adjacent to scattered or widely separated hazards, welding shops, gasoline dispensing points, storerooms, fuel areas, and construction areas.

All offices, canteens, cabins, accommodations and the like, will have certified fire extinguishers installed.

Flammable liquids will not be stored or dispensed in buildings or places of public assembly, general warehouses or in buildings containing sources of ignition, such as space heaters, cooking devices, open electric motors, motor vehicles or where welding or cutting or power generation operations are conducted.

Inside storage of flammable liquids will be confined to isolated fire-resistant buildings, except those small quantities, in approved sealed containers. These supplies will be stored in well-ventilated metal cabinets when not in use.

Petrol, acetone, alcohol, naphtha and benzene will not be used for kindling fires or as a solvent for cleaning clothes, tools, equipment or exterior of buildings. Only approved solvents will be used for cleaning purposes.

Storage of paints or paint materials, other than in paint storage buildings will be in the original sealed containers and be stored in ventilated metal cabinets, isolated from other materials.

Only Electric and radiator type heaters are permitted.

9.9. Workshop Safety

Machine tools will only be operated by authorized personnel and following suitable training and assessment.

Approved personal protective equipment will be issued and will always be worn when using machines or portable power tools.

Rotary or reciprocating machinery can be extremely dangerous. Loose clothing, e.g., ties or scarves, will never be worn and long hair will be tied back when working with such machines.

9.10. Office Safety and Safe Systems of Work

There are many hazards from equipment in the office environment which can be eliminated with forethought.

- do not overload sockets.

- damaged or suspect leads and plugs should be reported to the Engineer/Supervisor (Electrical)
- Before leaving work, all electrical appliances, including computer terminals, should be switched off unless otherwise instructed.
- follow instructions provided when clearing photocopier jams taking care to avoid hot or sharp surfaces.
- avoid contact with photocopier dusts.
- unplug shredders before clearing jams.

The drawers of cabinets, desks, cupboards, etc. will be kept closed when not in use and lower drawers filled first and only one drawer opened at a time to maintain stability.

"No Smoking" Policy will be obeyed, smoking is only allowed in designated areas.

9.11. Excavation Safety

1. All excavation work in the project must be planned, carried out, and controlled by a competent expert authorized by the project.

2.All excavations will be inspected by an expert person (subcontractor technical personnel prior to the control of REC technicians and engineers) to ensure that risks including subsidence and flooding are controlled. Inspections will be recorded and retained for review; daily excavation control forms will be filled.

3. Appropriate measures will be taken at any excavations, wells, earthworks, underground works, and tunnels to perform the following.

- Provide appropriate support to protect workers from danger from falling soil, rock or other material.
- Preventing persons, materials or objects from falling or flooding in excavated areas, wells, earthworks, underground works or tunnels.
- Guaranteeing safe and suitable ventilation for breathing in every work area and limiting any gas, smoke, vapor, dust and the like to quantities that are not harmful to health with mechanical ventilation in line with standards.
- Ensuring the safety of workers in any fire, flood or material fall.
- Taking measures to prevent material falling from the edges of viaducts, bridges and excavations by not leaving free material in case of wind.
- Taking measures regarding the underground living lines that may be found in the excavation area.

4. Continuous protection of the personnel working in the excavation will be ensured.

5. Appropriate level angles are determined by considering the ground structure, climatic conditions, possible tremors in the vicinity of the excavation area, surrounding water resources, excess load forces during excavations, and/or statically calculated supports and sets are used. Excavation surfaces, slope and height of the slopes are selected in accordance with the structure of the ground, its strength and working methods.

6. No part of any excavation, well, earthwork, underground work, tunnel fortification, or other support systems shall be constructed, altered, or dismantled without the supervision of a qualified person.

7. All excavations must be equipped with a protective system, except for hard rock ones.

8. It is mandatory to conduct a work-specific risk analysis in all work zones under the supervision of a specialist. (JHA)

9. All excavation works are subject to a work permit.

9.12. Manual Handling

REC-İSG-KMO-PR-015 Manual Handling Procedure will be followed.

The most effective way of avoiding injuries from manual handling is to use lifting aids or using the services of a trained lifting team.

A clear view over a load will always be kept.

For complex tasks a formal manual handling risk assessment will be carried out in order to identify any necessary control measures to protect personnel.

9.13. Safe Working with Mobile Plant

Mobile plant comes in a variety of shapes and sizes and includes common equipment, such as excavators, cranes and dumper trucks. This equipment can introduce a number of hazards into the work area that may cause serious accidents if operated incorrectly. In addition, mobile plant can become unsafe if not properly maintained in accordance with the manufacturer's instructions. One of the most common causes of accidents with mobile plant is when workers or members of the public approach the equipment while it is in operation. Work on underground services, such as pipes and cables, especially in and around public highways, often involve small, restricted work areas that can create additional risks.

A risk assessment will be prepared before operating mobile plant to identify any hazards, who is at risk, how they could be harmed, and the control measures needed to prevent accidents. When using mobile plant in any environment.

- All plant operators will carry out daily pre-use inspections on their mobile plant before work begins. These pre-use inspections are to identify obvious defects in the equipment.
- A full list of pre-use inspection checks will be contained in the plant operator's handbook for the mobile plant in question. If one is not available, ask your supervisor.
- Untrained workers will not be permitted to operate mobile plant.
- Keys will always be removed from the mobile plant when not in use, unless the risk assessment clearly states that keys will remain for safety reasons. If this is the case, site security will be in place to manage the risk of unauthorised use.

9.14. Blasting Works

REC-İSG-ÇYS-KMO-PL-18 Blasting Management Plan will be followed.

Job Hazard Analysis (JHA) will be prepared for blasting works to be carried out at all locations,

Personnel in blasting works must be competent.

Permit to work will be obtained for blasting works.

Affected community members must be informed, especially in blasting works to be carried out in residential areas,

Covering must be used in blasting works to be carried out in residential areas and stone scatterings must be prevented.

All machinery and equipment to be used in blasting works will be checked and used in accordance with the relevant project.

People who are not authorized will not be allowed to enter the zone and around.

9.15. Health, First Aid and Medical Treatment

The Subcontractor shall ensure, through auditable means, that all personnel, including subcontractor, employed on the project are assessed and passed as medically for fitness to work, and periodically re-assessed.

No one suffering from a transmittable disease will be allowed to work on the project. Employees using medication, which could influence their performance, shall report this to the medical staff.

The Subcontractor will ensure that its personnel and those of its subcontractor who are to work at remote sites have appropriate medical testing performed, including tests to detect unstable medical conditions, prior to arrival on site. No unstable medical conditions e.g., heart disease, respiratory disease, metabolic disease, neurological disease such as epilepsy, and psychiatric diseases are acceptable at remote sites.

The Subcontractor will ensure within their proposed system of audit and review that spot checks are conducted to verify compliance with this requirement.

The Subcontractor will operate a personal health programme in order to prevent illness occurring or spreading, and this shall include sexually transmitted diseases.

Health hazards will be discussed with employee involvement at H&S committee meetings.

Health standards and procedures will be defined for all job positions.

9.16. Working with Chemicals

REC-İSG-ÇYS-KMO-PL-12 Chemicals Hazard Procedure will be followed.

REC will maintain and provide an inventory of all hazardous chemical agents prior to locating such products on the construction site. This will include building materials, fuel, lubricants,

proprietary chemical products, fumes, dusts and gases produced during cutting, grinding, welding, blasting or other activity.

Safety datasheets (SDS) will be placed in usage and storage areas, and empty drums disposed of in accordance with these sheets. Guidance may be obtained from International Standard for Product Information.

Subcontractors will ensure that all chemical products used are properly labelled.

The following principles shall be adopted:

- Avoid the use of hazardous substances, in particular carcinogens, mutagens and highly toxic substances. Any use of such substances must be justified in writing.
- Minimize airborne concentrations by means of closed systems, and adequate ventilation, forced if necessary. Personnel exposures shall not exceed the levels in H&S standard in Turkish Law
- Use of PPE
- Inspect work involving hazardous substances and monitor exposure.
- Ensure control procedures are developed and validated.
- Ensure proper maintenance of PPE, especially breathing apparatus.
- Fully contain hazardous substances

These will not be used by REC or any Subcontractor:

- Volatile materials containing fluorine, chlorine or bromine combined with carbon (for example, conventional refrigerants, and solvents). Permitted exceptions are health-care products, and pesticides in limited quantities, but use of these must be decided taking into consideration all MSDS and national requirements and must not be used unless the usage is an obligation.
- Asbestos;
- Poly-chloro-biphenyls (PCBs);
- Petroleum spirit used as a fuel.
- Any radioactive material. Permitted exceptions are those in medical, material testing, and technical measurement applications; use of these must be decided taking into consideration all SDS and national requirements and must not be used unless the usage is an obligation.

9.17. Thermal Stress

Working at extreme heat conditions can be detrimental to worker health and therefore the following will be implemented:

- Suitably cool drinking water is to be provided for employees;

- Workers are to be instructed to drink small amount of cool water frequently to avoid dehydration;
- Employees will be encouraged to take breaks and hydrate any time they feel necessary;
- A space in a shaded area or an air-conditioned building will be provided for taking breaks.
- Shaded areas during remote outdoor work (e.g., constructing temporary shelters using tarps) will be provided to workers;
- REC will ensure that appropriate clothing will be provided and worn by workers, including light-coloured, lightweight, and loose-fitting cotton clothing that allows ventilation of air to the body during extreme temperatures;
- The job will be paced to allow more frequent breaks for fluid intake and sufficient recovery time during period of elevated temperatures; and
- Work changes will be considered to lower the risk of heat stress.

9.18. Dangerous Energy Control

REC-İSG-KMO-PR-19 Electrical Safety Procedure will be followed.

- In cases where there is a potential for accidental exposure to dangerous energy during any inspection, cleaning, maintenance, repair, etc. activities, LOTO (Lock Out / Tag Out) is applied together with the relevant work permit.
- Special risk analysis is mandatory in all working areas.
- During the commissioning phase of the project, the project-specific dangerous energy control and LOTO procedure will be prepared by the commissioning team.
- It is forbidden to work on the energized system.
- This standard does not apply when equipment is operating.
- The lock or tag on the energy isolation devices shall never be removed without approval.
- Tags removed from the locks will not be reused. It is forbidden to make changes to the tag,
- For machine or equipment isolation, it is necessary to obtain the approval of the authorized person who made the isolation and the designated control authority.
- Persons applying locks must be authorized by the project. (There must be technical personnel who have received training on the subject)
- All parties involved in the work will be informed (including those affected by the work, isolation authorities, and those who will work on machinery and equipment) before locking and removing locks.
- The locked and/or tagged energy isolation device will never be operated.
- All energy isolation devices must be locked. Isolation devices that cannot be locked by design must be modified for locking. Only the use of tags will be restricted. Only tags may be permitted in such very rare cases, if the modification would create greater hazard or if the lock cannot be physically attached to the isolating device.

9.19. Color Coding

Control and color coding are done only by the authorized person and the control results are recorded with forms.

All equipment/tools that are not color-coded or incorrectly color-coded will be removed from service immediately and allowed for use after re-checking.

1. Below are all the equipment/tools that need to be color-coded on a monthly basis:

- All lifting apparatuses (all kinds of slingshots, lifting locks, etc.)
- All parachute type seat belts and yoyos
- All lifting equipment (crane hooks, chain lugs, caracals', trifores, etc.)
- All power tools (spiral machine, drillers, crushers, etc.)
- All electrical appliances (cables, patch cords, extension cords, projectors, heaters, etc.)
- All electrical panels (main, distribution, supply, mobile, etc.)

2. The color-coding cycle, the color code of the period will change in monthly periods, the controls will be made on a monthly basis at the latest, and after each control, tape/cable tie, etc., in the color of the relevant period will be used.

3. After each control, the serial number of the relevant equipment/tool will be written, and the control will be recorded by the authorized person. In cases where the serial number is missing/deleted, the relevant equipment/tool must be numbered so that it cannot be deleted.

4. Color coding will be applied in a way that does not damage the equipment/tools and does not impair their properties.

5. Spray paint will not be used for color coding, except for steel/metal surfaces.

6. Tape and/or cable ties, the recommended color-coding practice for power tools and equipment, will be used.

7. Cable ties/tapes will be used without damaging the recommended color-coding practice for lifting equipment. (The use of tape is recommended for cloth straps).

8. Color coding will be applied on a monthly basis, and the control calendar for the last week of each month will be shared with subcontractors through the year. All checks will be planned in the first week of each month.

9.20. Food Processing, Storage, Personal Hygiene

All food handlers will be supplied with 2 pairs of uniforms, aprons, caps and safety shoes. They must maintain a clean, neat and tidy appearance, with short fingernails and hair. They must not wear jewellery whilst working.

Food Handlers must be rigorous in matters of personal hygiene, washing hands before touching food after having touched anything else. Any medical disorder of any nature, including cuts and temperatures, must be reported to a supervisor who shall re-assign duties until medical clearance has been obtained.

Food storage

Refrigeration and freezer facilities will be provided. Frozen food will be defrosted in refrigerated cabinets. Facilities will keep frozen food at –18 degrees Celcius, chilled food between –3 and +1 degrees Celcius, and refrigerated food between 1 and 4 degrees Celcius.

All cooked food will be kept separate from uncooked food.

Fish and meats will be stored in dedicated separate freezers.

Walk-in freezers/chillers will be provided with internal lighting. An external temperature indication shall give and the store will be readily opened from inside.

Sufficient food storage will be provided to cater for emergencies.

Food will be stored such that a first in first out system is in operation. Storage will be on raised shelves. Food store must be maintained clean, tidy and pest free.

No cleaning materials will be kept in food stores.

10. ACCIDENT AND INCIDENT MANAGEMENT

Incidents (Near Miss Incidents, Dangerous Incidents and Accidents) will be evaluated in line with REC-İSG-ÇYS-KMO-PR-06 Accident and Incident Management Procedure.

10.1. Implementation

Each incident will be examined, a preliminary assessment will be made and reported in the time and manner specified in the Accident-Incident Reporting Matrix.

For all accident/incidents involving injury, the necessary first response and treatment is given by the Workplace Doctor to the injured person who is referred to the Project Clinic after the accident, and the Clinical Accident Report Form is filled in by the doctor.

The Accident/Incident is also recorded and stored in the Clinical Application Registry. The company doctor or nurse will be provided with detailed information about the incident. The Clinical Accident Report will be updated as soon as an additional or new treatment is given by the Project Doctor. All records, such as Clinical Accident Report and doctor's reports received from hospitals, will be recorded in accordance with the medical privacy guidelines.

In order to transport the injured to the hospital, an ambulance will be available for emergency use in the project. If it is determined that this vehicle is used for another purpose, the necessary penal action will be applied within the scope of the H&S Disciplinary Violation Activities table.

10.2. Classification of Accidents and Incidents

Classification of accident/incidents and their entry to Ronesans Holding's H&S Portal will be made with reference to the Accident-Incident Management Procedure. The definitions and samples made in the procedure will be taken into account.

Regarding evaluation of the potential consequences of the accident/incidents, Risk Rating Matrix will be used as a reference during the evaluation.

Any event that is an indicator of the Occupational Health and Safety management of the project will be reported and recorded. Reporting the following will be a performance indicator of the

Occupational Health and Safety management at the construction site. Types of Accident/Incidents;

- Death
- Lost Time Injury
- Limited Incapacity for Work
- Accident with Medical Intervention
- Accident with First Aid
- Near miss
- Work Accident with Goods/Equipment Damage

The accidents/incidents including but not limited to those set forth hereunder are included under “Serious Accidents/Incidents”:

- Fatal accidents
- Occupational injuries/illnesses that cause severe bodily injury. Severe physical injury refers to bodily deterioration wherein any part of the body becomes deprived of functionality or wherein the functionality thereof is reduced significantly in terms of activity, whether at work or at private life. Such injuries can be permanent or temporary, chronic and acute. The injuries that involve such disabilities require treatment by any physician (e.g., major bone fracture, deep burn, amputation, etc.)
- Multiple Injuries: Accidents that cause 3 or more people to be hospitalized for more than 24 hours.
- Incidents with major property damage exceeding US$ 50,000, resulting from, but not limited to, fire, spillage, and explosions.
- Enforcement actions, major environmental incidents that may result in nonconformity notice or lead to notices served to legal authorities.
- Near-miss cases of high potential severity (with possible consequences of death, multiple injury or serious injury)
- Accidents/incidents leading to:
    - Reporting requirements to any judicial authority
    - State investigations
    - Legal sanctions, penal accusations, etc.
    - Diplomatic accusations and other government investigations,
    - Incidents covered in local, national or international media.
- Severe damages and impacts including, but not limited to, personal injury lawsuits, business interruption claims, traffic delays, environmental spills/leaks, and damages to areas around the workplace that cannot be classified at once, that may result in charges against Rönesans, and that may affect the public are also included in this category.

The Accident Incident Report Form is used for reporting all accidents. However, in fatal accidents or potentially severe incidents (Serious Accidents/Incidents), a detailed and

comprehensive report shall be drawn up using the Accident-Incident Investigation Report Format.

REC will ensure appropriate financial compensation for any persons suffering injury or ill health that is caused by Project activities.

All incidents are to be investigated and corrective actions documented and implemented as required.

11. TRAINING

REC-H&S-EYS-KMO-PR-05 H&S Training Procedure will be followed.

JHSU Legal Training:

16 hours of technical training will be legally provided by JHSU to all employees whose registry is in the project area. The personnel who shall be deployed to the project site shall receive legally mandatory trainings by the legally appointed occupational safety specialist and the occupational physician. The dissemination and follow-up of the 16-hour legal training process of the employees shall be the responsibility of the H&S-E instructors. The employees who lack basic training shall not be allowed access to the project site. Basic training shall be refreshed on annual basis, as is the case for the orientation training.

Orientation Training

Every employee deployed to work has to attend the onboarding orientation training, which includes the following topics.

- Holding H&S Policy
- Zero Tolerance
- General Rules on Site
- PPE Use and Project Zones (Green-Red Area)
- Project-Camp Smoking-Recreational Areas
- Camp Rules
- Electrical Safety
- Work Permit Systems and TRIC Card etc.

The orientation trainings are planned for 2 hours at minimum, taking into account that JHSU trainings are also delivered. This training is independent and separate from the legal compulsory training contents provided by the JHSU companies serving. This period can be increased depending on the content and scope of the training but cannot be less.

Onboarding orientation training must be completed on the first workday before the employees engage with operations that may expose them to potential hazards. The employees failing in the orientation training are not allowed to enter the project area.

Job Specific H&S Trainings:

Supply of the training materials and determination of the number of competent and experienced H&S Instructors are provided in collaboration with the Project Management. It is aimed that the employees successfully complete such trainings and achieve the competency and proficiency to maintain their job safely. The technical trainings set forth hereunder shall be organized by the REC International instructor. The topics are not limited to the titles provided hereunder, and the trainings organized in the 'Technical Training' category shall be held in classrooms and shall last for 2 hours.

Examples for the Job-Specific H&S-E Technical Training include;

- Hazard-Risk Management Training (Training wherein processes such as JHA, TRIC Card etc. are explained)
- Training Needs Assessment outputs
- Safe Use of Heavy Equipment (Technical trainings that involve hazards specific to the operated vehicle such as roller operator, excavator operator, etc.)
- Entry to Confined Spaces,
- Fire Supervisor/Watcher Training etc.

Foreman Training:

Achieving high H&S awareness, the foremen, taking an active role in the management of the teams, are of paramount importance in fulfilment of the occupational safety practices. The trainings set forth hereunder shall be organized at minimum as intended for raising awareness of the employees.

- Work Permit System, Job Hazard Analysis (JHA), TRIC & Card Applications and Control Process
- H&S Performance Management
- H&S Meetings Briefing etc.

Visitor Training:

Anyone visiting the project site for inspection or surveillance purposes must attend the H&S-E visitor training. Those failing to take the basic information training are not allowed to access the site. This training covers the following topics as minimum.

- Security and emergency procedures
- PPE requirements and usage
- Project green and red zones etc.

Material and Equipment Supplier Trainings

The persons delivering/supplying materials to the project area by vehicle will be allowed to the site after signing the site rules containing the "Safe Driving" instruction after receiving a brief training on the driving safety rules and site layout at the security point/gate of access. Other

machinery/equipment/vehicle entry procedure for accessing the project area with any vehicle is further applied.

Operator/Driver Trainings

The trainings for the users/operators/drivers of all kinds of vehicles, heavy-duty machinery and mobile equipment (Loader-Wheel Loader, Excavator, Truck, Forklift, Roller, Grader, Drills, Compactors, Mobile Crane, etc.) used in the work sites of the North Marmara Highway Section-8 project and relevant technical trainings are delivered taking into consideration the hazards and risks posed by the equipment.

Developing the Training Plans

The Training Plan is drawn up on weekly basis with reference to the trainings planned to be received by the employees according to the job they perform based on the training matrix drawn up as specific for the project and is published to the project site. In development of the plans, the data such as;

- Accidents occurring at the project / within the body of Rönesans Holding or the trend analyses.
- Nonconformities discovered on site.
- On-site observations
- Work schedule
- Job Hazard analyses or works to be executed for the first time.
- Change of working conditions or methods are further used.

Training Method (Alternate Training Methods)

- Toolbox Talks
- On the Job Training (OJT)
- H&S Campaigns

12. INFORMATION AND DOCUMENTATION

Project management systems addressing technical integrity and H&S must be properly documented, adhered to and understood.

Documentation shall be in the Turkish language and where appropriate translated into other languages if the work force does not speak Turkish

As built documentation and documented verification shall be provided demonstrating that construction is in accordance with design and verification that testing and commissioning is complete and to an acceptable standard.

Employee medical records shall be maintained with appropriate confidentiality.

The subcontractor shall, if requested by REC, promptly provide all notes, reports, correspondence, records, and other documentation (in any media) relating to any H&S requirements, including, the requirements of the H&S Plan.

REC and subcontractors shall:

- maintain, at the work site, copies of all permits required for the work being performed.
- ensure that their personnel are aware of the terms of such permits.

13. ASSESSMENT, ASSURANCE AND IMPROVEMENT

To promote good H&S management, subcontractor shall develop and implement an incentive programme. Contractor may reward or penalty to subcontractors for work assessed against predetermined standards.

The H&S incentive schemes shall be based on the Key Performance Indicators and observations carried out at subcontractor construction sites. The purpose of the scheme is to promote continuous improvement of H&S standards based on H&S Performance measurement.

REC and subcontractor shall continuously monitor and report upon H&S performance. All hazards and H&S non-conformances shall be reported.

A quality management system is required to ensure that work is performed in accordance with the standards as specified in the Contract.

Inspection of work systems and processes employed are carried out both by REC's and Subcontractor's teams. These are essentially discrete activities.

It is thus necessary that work is inspected and signed off as to acceptable quality standards.

H&S assessment shall be carried out in accordance with the H&S Plan and program. Audit observations will demonstrate management commitment to H&S performance. All H&S assessment tasks shall be carried out by competent H&S practitioners.

The incentive scheme involves an assessment of the effectiveness of H&S procedures and how well they are implemented. The subcontractor shall:

- Encourage personnel to report hazards and non-conformances in a blame free environment.
- Conduct task observations to ensure compliance with procedures and understanding of instructions.
- Monitor the effectiveness of risk control measures.
- Define and carry out an audit, review, and worksite inspection programme,
- Provide reports for assessment.
- Inspect vehicle condition, drivers' hours and distances.
- Report daily on specific traffic management plans and driving.
- Manage actions arising from inspections, reviews, and audits.
- Audit and review H&S activity
- Identify and report key performance indicators (KPI's)

- Monitor incident frequency rates.
- Define scope and aims of audit.
- Report weekly upon all activity, identifying work completed.
- Work only to pre-submitted method statements
- Stop work in the presence of uncontrolled hazards.
- Submit near miss, hazard and incident reports.
- Provide competent personnel for all tasks.
- Report on the activities of H&S inspectors
- Prepare method statements for all tasks and submit these to REC.
- Provide method statements for each task.
- Provide CV's and job descriptions for all persons employed in H&S roles and as otherwise requested by REC.
- Attend H&S meetings.
- Analyze performance indicators and action items and consider how the management system might be modified to improve future performance.

The subcontractor shall audit his own activity and provide audit reports to the assessment team. The audit report shall consider :

- Multi-site arrangements
- Aims
- Scope
- Standards
- Controls
- Corrective actions
- Management reviews

REC assessment team shall:

- Monitor the standards of H&S performance for each construction crew. Inspections will focus primarily on the identification of good practices, unacceptable actual or potential impacts and will also consider compliance and non-compliance with the H&S management system or policy standards.
- Perform audits on the operation of the Contractor's H&S management system.
- Perform an audit at project milestones to ensure that the completed work complies with the H&S requirements of the design.
- Review subcontractor risk assessments for coverage (required as part of the method statement)

- Participate in the evaluation and review.

14. MONITORING, VERIFICATION AND EVALUATION

REC-H&S-EYC-KMO-PR-09 H&S Monitoring, Verification and Evaluation Procedure will be followed.

Internal audits are scheduled audits performed by the Holding H&S and Group Companies. 2. Party/Stakeholder Audits: Audits performed by the customer, partner company and creditor companies. Third party / external audits: Certification audits, audits performed by the legal authority, etc.

The scope of the audit for the audits to be carried out is determined by evaluating the items as set forth hereunder, including but not limited to:

- Critical operations carried out in the project,
- The current and planned work items and needs of the Project,
- Accident / incident and trend analysis,
- Project risk assessment studies/Job hazard analyzes,
- Feedbacks and requests from the Group Company,
- Actions to be taken to achieve goals,
- H&S Management System requirements,
- Company procedures, processes, instructions, etc.,
- Feedback from and requirements of the Lender,
- Project requirements (EBRD, IFC etc.), and
- Legal H&S Legislation

14.1. Daily H&S Observations

The project operations will be audited on daily basis by Project H&S and Site teams. The H&S team must ensure that the operation supervisors/team leaders deployed on site are performing their H&S duties, that necessary assessments are made, and that corrective, preventive and remedial actions are taken for all recognized hazards and risks.

14.2. Audits on Conformity to the System Procedures

The Project H&S Department and relevant Section Managers will conduct conformity audit to the system procedures (Accident Incident Management Procedure, Hazard and Risk Management Procedure, Permit to Work System Procedure, Subcontractor Management Procedure, etc.) through questionnaires drawn up to monitor compliance with the H&S-E system procedures defined within the scope of the Holding and the Project. The period for inspections is scheduled as 3 months.

14.3. Subject Based Periodic On-Site Inspections: H&S Inspection Forms

The inspection forms that contain major requirements for monitoring effectiveness and sustainability of the project and the H&S-E system practices, that monitor the site proactively according to the progression rate of the work, that diagnose the nonconformities on site and indicate the effectiveness trend of the actions taken over time are created.

Said inspection forms will be drawn up taking into account the project-specific procedures and will be revised regularly as needed. The employees using such inspection forms will be trained accordingly and efficiency in using forms will be checked at regular intervals.

14.4. Monitoring Post-Accident / İncident Remedial Actions

Actions identified after any major accident/incident are shared with the related parties and the Holding H&S-E Department by the Group Company H&S-E Coordinators so as to address such accident/incident in other projects of the Group Company. The H&S-E Notices related to high potential accidents are produced and occurrence of the accident, direct-root causes and actions to be taken are defined. The H&S-E Notices are forwarded to other projects by the Group Company H&S-E Coordinator. Following any fatal and high potential accidents in any project, a remedial action plan is requested from all projects.

14.5. H&S Meetings

Meetings will be held wherein the hazards and risks related to the ongoing or future works of the project, the actions to be taken to prevent occurrence thereof, and the persons in charge are determined.

In this context, monthly H&S-E Management meetings to be held with attendance of the Project Management, the weekly meetings with attendance of section managers and engineers, and weekly foreman meetings will be held.

The TRIC system, wherein the job and hazards are communicated to the employees before proceeding to the work will be monitored, and effectiveness thereof will be measured at regular intervals.

On-Site H&S walks is one of the methods to be used for demonstrating leadership and visibility of management on matters related to H&S. Such walks to be carried out by the site management and the supervisors on weekly periods will aim that the project management (project manager, site managers, site supervisors, section managers, etc.) and supervisors take the lead in identifying the hazards and risks on site and to take actions as required.

14.6. Follow-Up / Reporting and Evaluation of Actions

During verification and evaluation processes, studies are planned for the actions taken in line with the corrective / preventive and remedial actions regarding the nonconformities discovered during the routine progress in the project site and are completed within specified time. The actions so identified, and the follow-up thereof are performed via the ACONEX system.

For Holding audit actions that cannot be closed, the related Group Company H&S-E Department and the Holding Corporate H&S-E Management Department are informed by notifying the reason for failure in closure and by setting a new deadline date for closure.

H&S Plan			
Subject	KPI	Target (To help ensure the safety in general)	Period
To ensure that the necessary security measures are taken and controlled general Health& Safety	Lost Time Injury Frequency Rate	5/3miohours =2.6 LTIFR (8 lost time injuries take place every million hours worked. So if you have 8 lost time injuries and 3 million hours worked, your LTIFR is 2.6)	Yearly
	Lost Time Injury Incidence Rate	0.3 LTIR (we have 3 incidents. 3 x 100 = 300. Divide that by the number of people and we get a LTIIR of 0.3. So for every 100 people, an organization would have a 0.3 LTIs.)	Yearly
	Number of Equipment Breakdowns	5	Yearly
	Productive Days %	95% (the rate of days without lost)	Yearly
	% of Management Trained in Health & Safety	100 %	Yearly
	Average Time to Resolution of Risks & Issues	5 days	Yearly