T.C. ULAŞTIRMA VE ALTYAPI BAKANLIĞI

EPC Contractor

REC ULUSLARARASI

Project

NORTHERN MARMARA HIGHWAY SECTION 8 PPP PROJECT

REV	*DATE*	*REMARKS*	*PREPARED BY*	*CKECKED BY*	AUTHORIZED BY
0	*06.04.2022*	*FIRST PUBLICATION of the Procedure in line with the holding / project standards*	*Seda BAKAN*	*Muzaffer KOÇOĞLU*	*Selim SÖNMEZ*
1	*30.12.2022*	*REVISION of the Procedure regarding Lenders and LESA comments*	*Seda BAKAN*	*Muzaffer KOÇOĞLU*	*Selim SÖNMEZ*

STATUS

FOR INFORMATION	☐
FOR REVİEW	☐
FOR APPROVAL	☒
APPLICABLE TO DESIGN	☐
APPLICABLE TO PURCHASING	☐
APPLICABLE FOR CONSTRUCTION	☐
FINAL	☐

PUBLICATION OWNER

REC ULUSLARARASI

SIGNATURE	DATE

DOCUMENT NO

REC-İK-KMO-PL-01

DOCUMENT TITLE

LABOUR MANAGEMENT PLAN

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ABBREVIATIONS AND ACRONYMS

AIDS	Acquired Immunodeficiency Syndrome
AOI	Area of Influence
CLO	Community Liaison Officer
CLS	Core Labour Standards
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health, and Safety
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management System
GAP	Gender Action Plan
GBVH	Gender-Based Violence and Harassment
GM	Grievance Mechanism
HR	Human Resources
HSE	Health, Safety and Environment
IFC	International Finance Corporation
KPIs	Key Performance Indicators
LMP	Labour Management Plan
NGO	Non-Governmental Organization
NMM	Northern Marmara Motorway
OHS	Occupational Health and Safety
OSE	Occupational Safety Expert
OSYM	Measuring, Selection and Placement Centre (ÖSYM)
PAC	Project-Affected Communities
PPE	Personal Protective Equipment
PR	Performance Requirement
PS	Performance Standards
RAP	Resettlement Action Plan
REC	REC International
SDSs	Safety Data Sheets
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle (Nakkaş Otoyolu A.Ş.)
STD	Sexually Transmitted Disease
WHO	World Health Organization

INTRODUCTION

1.1. Purpose

The Human Resources (HR) Policy of REC International (REC)[1] provides overall direction on the policies that will be applied for labour and working conditions. This Labour Management Plan (LMP) details how the HR Policy and other Project-specific labour related measures should be implemented. The LMP aims to ensure that labour relations and working conditions are managed in accordance with the applicable Project standards and legislation.

The key objectives are:

- To promote the fair treatment, non-discrimination, and equal opportunity of workers.
- To establish, maintain, and improve the worker-management relationship.
- To promote compliance with national employment and labour laws.
- To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain.
- To promote safe and healthy working conditions, and the health of workers.
- To prevent and address any form of gender-based violence and harassment (GBVH), bullying, intimidation, and/or exploitation in the workplace [2].
- To avoid the use of child and forced labour.

This plan will be implemented by the HR department, supported by the Social Manager and Health, Safety and Environment (HSE) Manager of Nakkaş Otoyolu A.Ş. (Special Purpose Vehicle (SPV)) to ensure that working conditions comply with the plan described. REC will ensure that contractors and sub-contractors develop and implement policies and procedures in line with this plan.

1.2. Scope

The scope of this plan covers direct workers, contracted workers and supply chain workers. Labour and working conditions are described in IFC PS2 and EBRD PR2. The requirements set out in this LMP have been in part guided by a number of international conventions and instruments, including those of the International Labour Organization (ILO) and the United Nations (UN).

- Direct Workers: Workers directly engaged by the REC and SPV;

- Contracted Workers: Workers engaged through third parties to perform work related to core business processes;

1 The EPC contractor.

2 EBRD's Environmental and Social Policy (2019) states: Violence and harassment" should be understood as a continuum of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, having the aim of causing physical, psycho-social, or economic harm, including GBV. GBV is an umbrella term for any harmful acts perpetrated against a person's will and that is based on socially ascribed gender differences. GBV includes acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion and other deprivation of liberty.

- Supply Chain Workers: Workers engaged by the REC's primary suppliers.

1.3. Links to Other Policies, Plans and Procedures

This procedure is guided or supported by other policies, plans and procedures that have been developed as part of the Project-specific Environmental and Social Management System (ESMS). Those of particular relevance to this plan are as follows:

- Human Resources Policy;
- Human Rights Policy;
- Zero Tolerance Policy;
- Gender-based Violence and Harassment (GBVH) Policy;
- Occupational health and safety (OHS) Policy
- Environmental and Social Sustainability Policy
- Code of Business Ethics and Conduct;
- Health and Safety Plan;
- Gender Action Plan (GAP);
- Community Health, Safety and Security Management Plan
- Hazard and Risk Management Procedure;
- Local Recruitment Plan;
- Camp Management Plan;
- Contractor Management Plan;
- Supply Chain Management Plan.

2. ROLES AND RESPONSIBILITIES

General organization chart of Project Management related to implementation of the ESMS is provided in the Environmental and Social Management and Monitoring Plan (ESMMP). (See also 11. MANAGEMENT OF SUB-CONTRACTORS, for more detailed elaboration of roles and responsibilities in relation to sub-contractor management.)

Table 1. Roles and responsibilities for the implementation of this plan

Entity	Position	Roles & Responsibilities
SPV	Social Manager	• Monitoring the implementation of the LMP, including reviewing and approving reports from Project HR Chief; • Determining and monitoring the relevant corrective actions within the scope of continuous improvement and reporting to all relevant parties; • Ensuring that the LMP is reviewed and updated at regular intervals during the course of the project; • Overseeing the effective implementation of the worker grievance mechanism and reviewing grievance logs at regular intervals; and

		• Supporting the Gender Lead with managing and monitoring GBVH risks related to the workforce and Project Affected Communities (PACs). This includes awareness raising about GBVH and the grievance mechanism.
SPV	HSE Manager:	• Will support the HR Department, in collaboration with the Social Manager, in the implementation of LMP, especially on transdisciplinary areas, such as H&S, Traffic Safety, Community Health and Safety and GBVH.; • Will support Social Manager in managing gender aspects, as per this plan and GAP, throughout the project. • Will act as one of the contact points for GBVH so individuals can report to a person of their own gender
SPV	HR Executive	• Day by day implementation and monitoring of LMP • Reporting the performance analysis, trends and status of corrective actions to Social Manager • Implementation and monitoring of grievance mechanism
REC	Project Manager	The Project Manager has overall responsibility for the implementation of this plan and the provision of resources that may be required
REC	Construction Manager	• Ensuring that all site staff, including sub-contractors and activities comply with this plan; • Supporting the EHS Team with respect to activities described under this plan' • Reporting to the Project Manager monthly on all accidents and incidents that have occurred on the project, analysis on trends and corrective and preventative measures implemented; and on grievances or concerns raised by the workforce with respect to the project. • Establishing female and male Gender Focal Points, with the support of the Gender Lead, to be trained and contribute to GBVH management.
REC	Project HR Chief	• LMP implementation and reporting to SPV Social Manager for compliance monitoring; • Ensuring that all site staff, including sub-contractors and activities comply with this plan, • Conducting due diligence to assess sub-contractor management systems in relation to labour management and their compliance with this plan, onboarding new sub-contractors, and agreeing and monitoring corrective actions with new sub-contractors on labour related matters as needed; • Monitoring and evaluating project compliance with laws, regulations and Lenders Project requirements, including sub-contractor performance,

		• Responsible for collecting data on key performance indicators (KPIs), including gender-disaggregated KPIs where relevant, in accordance with Section 11 Monitoring, Assurance And Verification of this LMP and compiling reports for submission to SPV Social Manager; • Ensuring that there are processes in place on all project sites for recording all workers on site, their employer and their working hours; • Reporting all employment issues to the Project Manager, • Increasing awareness among sub-contractors regarding Project labour requirements; • Overseeing training and awareness raising on H&S, GBVH and labour requirements under this plan for all workers; • Ensuring gender diversity in the workforce, including developing a strategy for the promotion and recruitment of females, including suppliers; • Following procedures related to employment and training for site-specific issues; • Recording general and local employment rates and processes; • Ensuring that there are processes in place so that all workers receive documented information regarding contractual terms and conditions and legal rights; • Participating and supporting audits which will be conducted by a third party labour auditor in line with ESAP, including site inspections, development and implementation of corrective action plans; • Ensuring salary and benefit payments of all employees (including its sub-contractor employees) are made on time, in compliance with their employment contract, national legislation, and are in line with the principle of equal pay for work of equal value (e.g., women and men are paid the same for the same work); and • Supporting the Gender Lead with GAP implementation and monitoring.
REC	Project H&S Manager	• Responsible for risk assessment and compliance with health and safety standards across the project [*to be elaborated according to job description*]. • Assessing and monitoring sub-contractor H&S systems, including: ○ Identification of H&S personnel, their qualifications, and certifications; ○ Records of safety and health violations, and responses; ○ Accident and fatality records and notifications to authorities; and ○ Identification of safety committee members and records of meetings.

REC	Community Liaison Officer	• Assisting the Project HR Chief in implementing Worker Grievance Mechanism; • Assisting Project HR Chief in keeping records regarding all worker grievances, including nature of grievance, timeframe for addressing and actions taken in response; • Supporting the Project Manager and HR Chief in tracking the outcome of complaints and keep records to report to the Project Manager weekly, monthly and annually • Assisting Project Manager and HR Chief in disseminating Grievance Mechanism among workers.
REC	Female Community Liaison Officer	• Will act as contact point for GBVH so individuals can report to a person of their own gender.
REC	Gender Lead (or alternative):	• Responsible for managing GBVH risks and mitigation risks and mitigation measures and for receiving complaints • Establishing an institutional structure and identifying female and male gender focal points to support GAP implementation, awareness raising of the Gender Policy, and management of the internal and external gender-sensitive grievance mechanism; • GAP implementation and monitoring; • Workforce and PAC awareness raising of project gender safeguards; • Capacity development and training on gender concepts and safeguards; • Implementation of internal and external gender grievance mechanism; • Identifying a third party to support GBVH incident reporting and act as a referral pathway for the workforce and PACs; • Ensuring that work areas and PPE meets the needs of female workers in collaboration with H&S Manager; and • Ensuring that worker accommodation meets the gender requirements set out in EBRDs guideline.

3. DEFINITIONS

Child Labour	"Work that deprives children of their childhood, potential and dignity and that is harmful to their physical and mental development."
Contracted Worker	Workers engaged through third parties to perform work related to core business processes.
Direct Worker	Workers directly engaged by the REC and SPV.
GBVH	"Umbrella term for violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment."
Gender	"Socially constructed roles, attributes, opportunities and relationships that a given society considers appropriate for men and women. These expectations differ from society to society and change over time. In many societies, it has been recognised that there are more than two genders. However, "men/boys" and "women/girls" are the most commonly recognised genders."
Sex	"Refers to the external physical differences that act as a marker upon which male or female sex is assigned at birth."
Sexual abuse	"The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with children (as defined by the UN Convention on the Rights of the Child as any person under the age of 18) is sexual abuse, regardless of the age of maturity or consent locally. Mistaken understanding of the age of a child is not a defence."
Sexual exploitation	"Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another."
Sexual harassment	"Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment."
Sexual orientation	Refers to each person's capacity for emotional, affectional and sexual attraction to, and intimate and sexual relations with, individuals of a different gender or the same gender or more than one gender.
Supply Chain Workers	Workers engaged by the REC's primary suppliers
Survivor	"A person who has experienced GBVH and survived. The terms "victim" and "survivor" are often used interchangeably. "Survivor" is the term generally preferred in the psychological and social support sectors."

Violence and harassment	"A range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment."
Worker	A person carrying out activities on, or related to, the activities of a company or their business partners. This includes people employed directly or through third parties, such as contractors, sub-contractors, labour agencies or suppliers. This includes people in high and low-skilled positions, those engaged informally, in training, interns and apprentices, workers whose employment has been terminated, volunteers, jobseekers and job applicants

4. WORKFORCE OVERVIEW

An overview of the project workforce is described below:

SPV workers:
The total number of workers engaged by SPV for the project will be 23 for construction.

The table below illustrates the planned maximum and average workforce during the construction period:

Table 2. Project worker engagement plan, classified by white and blue collar

	Max	Average
REC	504	371
White Collar	294	221
Blue Collar	34	21
Supportive - No effect on construction	176	129
SUB-CONTRACTOR	2,398	1,493
White Collar	114	71
Blue Collar	2,284	1,422
TOTAL	2,875	2,032
White Collar	408	292
Blue Collar	2,318	1,443

Contracted Workers:

Contracted workers will be employed as deemed appropriate by contractors, sub-contractors, and other intermediaries. When contracted workers are hired through contractors or sub-contractors, REC and SPV will make a good faith effort to: (i) evaluate the past performance of these (sub)contractors in terms of employment and occupational safety and health; and (ii) demand that they adhere to the LMP's requirements.

REC will ensure that contracted workers have access to an effective grievance mechanism that meets the requirements of the applicable project standards.

Supply chain:

As part of the supply chain assessment process outlined in the Supply Chain Management Plan, REC will identify and assess the risk of child labour and forced labour being used in the operations of its primary[3] suppliers.

Migrant workers: REC will identify migrant workers and ensure that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out the same work. Sub-contractors will be requested to provide relevant data on migrant workers.

Gender: Since females are significantly under-represented in the workforce, REC will endeavor to attract females for all roles during the construction phase, including in the supply chain. As stipulated in the GAP, activities will include;

- Promoting the female recruitment on advertisements and through stakeholder engagement, including with the local authorities (such as İŞKUR), recruitment companies, and communities, and establishing a target of at least 5% females during construction;
- Promoting women's competencies and career development through establishing a women's talent program and providing mentorship in supervisory and management positions;
- Seeking opportunities to engage with local female owned small and medium enterprises (SMEs), including engaging with the Women Entrepreneurs Association of Turkey (KAGIDER);
- Establishing and maintaining a gender-disaggregated employment register to allow tracking progress over time;
- Promoting non-discrimination and gender equality in the workplace; and
- Creating a gender-sensitive enabling environment in relation to labour rights, maintaining the principle of equal work for equal value, and mainstreaming gender into hazard and risk analysis.

In line with the Project GAP, the recruitment of women will be promoted using job adverts and through community engagement.

5. ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

Key Labour Risks

Worker health and safety risks related to the construction activities of a highway include exposure to physical, chemical and biological hazards during construction activities such as: use of heavy equipment, trip and fall hazards, exposure to asphalt fumes, noise and dust, falling objects, exposure to hazardous materials and exposure to electrical hazards from the use of tools and machinery. As the construction activities will involve hazardous work, persons under the age of 18 will not be employed by the Project. Many workers will be exposed to occupational health and safety hazards, primarily including but not limited to:

- Exposure to chemicals (asphalt fumes, pulverized silica, fuels, solvents, paints)
- Welding hazards (Aluminum Thermite welding fume emissions, burns and radiation)

[3] The primary suppliers to the project shall be companies who, on an ongoing basis, will directly provide goods or materials essential for the core functions of the project.

- Excavations, earth works hazards vibration
- Vibration of heavy construction equipment
- Dust, noise, trip hazards
- Traffic accidents
- Lifting of heavy materials
- Accidents with exposed rebars
- Ergonomic hazards during construction
- Environmental hazards (insects, wasps, bees, etc.)
- Electrocutions and arc fault burns
- Electrical works
- Lack of safe Project equipment and facilities for females, including menstrual hygiene facilities (e.g., lockable toilets, sanitary materials and bins, water), gender-segregated accommodation and social spaces, PPE

Based on the experience with construction projects in Turkey, it is assessed that overtime hours may be a potential labour risk. This risk shall be addressed with specific provisions in this LMP.

Other key labour risks addressed in this LMP relate to:

- Informal employment (known to be widespread in the Turkish construction sector);
- Working conditions for vulnerable workers, including low-income workers, casual workers, migrant workers and refugees;
- Risk that vulnerable workers may not lodge grievances, and labour rights breaches may go unnoticed
- Poor or potentially deteriorating conditions in pre-existing worker accommodation, potentially leading to worker grievances and unrest;
- Potential GBVH among the workforce and in PACs, resulting from labour influx;
- Potential constraints on realization of freedom of association for temporary or subcontracted workers; and
- Reputational risks associated with job losses amongst contractor workforces at the completion of works, particularly in relation to locally hired workers.
- Risk of gender based discrimination in recruitment (although there is an indication in the environmental and social impact assessment (ESIA) that there will be a gender quota and other measures)
- Risk that workers may be willing to forego rights in exchange for income.

6. BRIEF OVERVIEW OF LABOUR LEGISLATION: TERMS AND CONDITIONS

Types of Employment Contracts

As per the Turkish Labour Law (4857: Law No), the main categories of employment contracts are: definite (fixed term) and indefinite (open-ended), full time and part time contracts, continuous and transitory contracts; seasonal; employment contracts with or without trial periods; provisional employment contracts and team employment contracts. Employment

which lasts only up to 30 days is transitory; and employment which requires a longer period is continual. If employment is transitory, provisions of the Obligations Act shall apply on certain matters as defined by the Labour Code.

Article 5 of the Turkish Labour Code embraces the principle that all employees should be treated equally. Accordingly, employers cannot treat temporary and agency workers or part-time workers differently from the permanent employees unless justifiable grounds exist for the different treatment.

Wages and deductions

Article 32 of the Labour Code defines “wage” in general terms, as the amount of money to be paid in cash by an employer or by a third party to a person in return for work performed by him. Without discrimination, each employee has a right to demand remuneration for the work they conduct. The salary of an employee cannot be lower than the minimum wage amount which is determined by the state and redefined two times every year. There is a national minimum wage that applies to all employees in Turkey. Under Article 39 of the Labour Code (4857), the minimum wage is determined and revised by the related commission of the Ministry of Family, Labour and Social Services at least once every two years.

Pursuant to Article 34 of Law No: 4857 (Turkish Labour Law) Any worker whose wage is not paid within twenty days as of the date of wage payment except for a force major may abstain from fulfilling his/her working liability. Even if the non-fulfilment of working liabilities for this reason based on personal decisions of workers gains a collective character numerically, this shall not be considered as a strike. The highest interest rate applied for deposits shall be applied for wages not paid on due date.

The labour contracts of such workers shall not be terminated, new workers shall not be admitted in their places and their works shall not be assigned to other persons for not working due to this reason.

Pursuant to Article 38 of Law No: 4857 (Turkish Labour Law), the employer shall not exercise wage deduction penalty for the worker for reasons other than those specified in the collective contract or labour contract.

The deductions to be made from worker's wages as penalties should be immediately informed to the worker along with reasons thereof. Such deductions from worker wages shall not exceed two daily wages in a month or two days' earning of the worker in wages paid per piece or per the amount of work performed.

Such deductions shall be deposited with the account of the Ministry of Family, Labour and Social Services within one month as of the deduction for utilization for the training and social services of the workers, in one of the banks established in Turkey and entitled to accept deposits, to be nominated by the Ministry. Every employer shall be obliged to keep a separate account of such deductions at the business.

Working hours

According to the Turkish Labour Law; The working period shall be maximum 45 hours a week in general aspect. Unless otherwise agreed, such period shall be applied by equally assigning it to working days of the week.

The normal weekly working period may be differently assigned to working days of the week, on the condition that it does not exceed eleven hours a day, upon agreement of the parties. In this case, the average weekly working period of the worker shall not exceed normal weekly working period within a period of two months. The compensation period may be increased by up to four months through collective labour contracts (Article 63).

The workers shall be informed of the starting and ending times of daily working periods as well as of break times.

Starting and ending times of the working period may be arranged differently for workers, according to the nature of the work. (Article 67).

Periods reckoned as working period

According to the Turkish Labour Law; The following periods shall be taken account of within the daily working period of the workers

a) The periods spent on the way, in cases where the workers are sent by the employer from their workplace to any other places to work.

b) Free periods of the worker spent at the workplace, being available for working at any moment but waiting for any possible work, without working.

c) Periods spent by the worker for being sent by the employer to another place, or being made occupied at the house or office of the employer or any place relating to the employer, without performing his/her main job.

d) The periods of breast-feeding female workers to be specified for breast feeding and

e) Periods elapsing for collective and regular transport of workers to and from their workplaces which are distant from their settlement area for any kind of work requiring collective transport such as construction, maintenance or repair and modification of railways, roads and bridges. (Article 66).

Overtime hours and overtime payment

As per Article 41 of the Labour Law, works which exceed forty-five hours a week are defined as overtime. An employer may request employees to work overtime within legal limits set by the law. The employee’s consent shall be required for overtime work. Total overtime work shall not be more than two hundred and seventy hours in a year. Pregnant women, and breastfeeding mothers cannot be required to work overtime.

Weekly rest day and rest breaks

The employees are allowed to take a rest for a minimum of twenty-four hours (weekly rest day) without interruption within a seven-day time period, provided they have worked up to 45 hours on the days preceding the weekly rest day. By law, employers do not have the right to deduct this weekly rest from the employees' salaries. Additionally, Article 68 of the Labour Law states that employees are entitled to a rest break, the duration of which varies depending on the working hours. Each employee is entitled to 15 minutes of break for jobs lasting up to four hours; 30 minutes of break for jobs lasting up to 7.5 hours, and one hour of break for jobs lasting more than 7.5 hours. Arrangements for breaks will be made according to the local traditions and requirements of the work.

Such breaks shall be at minimum level, and applied uninterruptedly.

However, such periods may be applied intermittently by reaching an agreement, considering the climatic and seasonal conditions and local traditions as well as the nature of the work.

Breaks may be used by workers at the same time or at different times at a workplace.

Article 68 of the Labour law states that the break rest periods will not be counted as part of the working hours.

Leave

The minimum leave period according to the length of service of the employee is defined in the Labour Law as follows:

- 1 to 5 years (included) - 14 working days
- 5 to 15 years - 20 working days
- 15 years (included) or longer - 26 working days
- Maternity Leave – 16 weeks
- Paternity Leave – 5 days

The Law stipulates that paid annual leave may not be less than 20 days for employees over the age of 50. Employees are also provided to the right to take up to 4 days leave without pay, on the condition that the employee provides documentary evidence that s/he is spending his/her annual leave at a place other than where the workplace is located.

Employees engaged in seasonal or other occupation(s) which, owing to their nature, last less than one year are not entitled to paid annual leave.

Paid leave for civil servants has been defined in the Law (No:657) as; those who have served for less than 10 years have 20 days of annual leave and those who have served for more than 10 years have the right to 30 days annual leave.

Labour disputes

The Labour code of Turkey includes provisions that allow workers to resolve disputes in cases where there is a disagreement between the employer and the employee over the essential terms and conditions of a labour agreement or other aspects of work. (Article 20 of the Labour Law; Article 91 of Labour Law regulates “the application to The Ministry of Family, Labour and Social Services” for worker’s rights arising from their debt owed; Article 50-51-52 of Law No. 6356 on Trade Unions and Collective Bargaining Agreements regulates “rights of application to the High Board of Arbitration and Private Arbitrator for workers labour disputes”; Article 3 of Law on Labour Courts numbered 7036 regulates “conciliation procedure”.)

The employee who alleges that no reason was given for the termination of his employment contract or who considers that the reasons shown were not valid to justify the termination shall be entitled to lodge an appeal against that termination with the labour court within one month of receiving the notice of termination. If there is an arbitration clause in the collective agreement or if the parties so agree, the dispute may also be referred to private arbitration within the same period of time.

The burden of proving that the termination was based on a valid reason shall rest on the employer. However, the burden of proof shall be on the employee if he claims that the termination was based on a reason different from the one presented by the employer.

The court must apply fast-hearing procedures and conclude the case within two months. In the case the decision is appealed, the Court of Cassation must issue its definitive verdict within one month. (Article 20)

If the court or the arbitrator concludes that the termination is unjustified because no valid reason has been given or the alleged reason is invalid, the employer must re-engage the employee in work within one month. If, upon the application of the employee, the employer does not re-engage them in work, compensation to be not less than the employee's four months' wages and not more than his eight months' wages shall be paid by the employer.

In its verdict ruling the termination invalid, the court shall also designate the amount of compensation to be paid to the employee in case s/he is not re-engaged in work.

The employee shall be paid up to four months of their total wages and other entitlements for the time not re-engaged in work until the finalization of the court's verdict. If advance notice pay or severance pay has already been paid to the reinstated employee, it shall be deducted from the compensation computed in accordance with the above-stated subsections. If term of notice has not been given nor advance notice pay paid, the wages corresponding to term of notice shall also be paid to the employee not re-engaged in work.

For re-engagement in work, the employee must make an application to the employer within ten working days of the date on which the finalized court verdict was communicated to them. If the employee does not apply within the said period, termination shall be deemed valid, in which case the employer shall be held liable only for the legal consequences of that termination. (Article 21)

Termination of an employment contract:

Under the Labour Code, employers can terminate contracts in two ways: (i) showing a valid reason (Article 18-19) or (ii) breaking the contract for a just cause. Employees who have completed 6 months of employment in a workplace that has at least 30 workers, can benefit from certain protections under the Labour Code, protecting the worker from arbitrary termination of his/her contract. In order for the termination of an employment contract to be valid, a written notice must be given to the employee and legal notice periods must be respected. However, in certain cases, employers can terminate the employment relationship on the basis of a just cause (for reasons of health, for immoral, dishonorable or malicious conduct or other similar behavior, force majeure). In these cases, the employer is not obliged to comply with the legal notice periods and can terminate it immediately. For further details, please see, Labour Code, Articles 24-26.

Severance payment: Upon termination of the employment contract, employees are entitled to a severance payment on the condition that the employee has completed at least one year of continuous employment. This payment is calculated by multiplying the number of years of employment with the employee's monthly salary at termination. If the employer terminates the employment contract under just cause based on health reasons or force majeure, the employer must give severance pay to the employee, if applicable. However, if the employer terminates the employment contract under just cause on grounds of immoral and dishonorable acts of the employee, the employer is not liable to pay severance. If the employee terminates the employment contract for just cause, the employer must pay severance in all cases.

However, where the employee terminates the employment contract at will, without the presence of any cause set out under the Labour Code, the employer is not liable to pay severance to the employee.

Forced Labour: Forced labour is work that is performed involuntarily and under the menace of any penalty.

This definition consists of three elements:

- Work or service: “All work or service” refers to all types of work, service and employment, occurring in any activity, industry or sector, including in the informal economy. Forced labour can occur in both the public and private sectors.
- Menace of any penalty: The “menace of any penalty” refers to a wide range of penalties used to compel someone to perform work or service, including penal sanctions and various forms of direct or indirect coercion, such as physical violence, psychological threats or the non-payment of wages. The “penalty” may also consist of a loss of rights or privileges (such as a promotion, transfer, or access to new employment).
- Involuntariness: The terms “offered voluntarily” refer to the free and informed consent of a worker to enter into an employment relationship and his or her freedom to leave the employment at any time. For example, an employer or recruiter could interfere with this freedom by making false promises to induce a worker to take a job that he or she would not otherwise have accepted.

Ronesans Holding has an overarching Code of Business Ethics and Conduct. The principles and requirements stipulated in this document are mandatory for REC and sub-contractors’ operations. Key principles are:

1. Workers are treated with dignity, respect, and fairness
2. Workers are free from forced, trafficked, and child labour
3. Working conditions are safe and healthy
4. Living conditions are safe, clean and habitable, any deductions for accommodation and food will not be made or at a low level.
5. Recruitment practices are ethical, legal, voluntary, and free from discrimination
6. Access to documentation and mobility is not restricted
7. Freedom to change employment is respected
8. Wage and benefit agreements are respected
9. Worker representation is not infringed
10. Worker passports will not be withheld.
11. Recruitment agencies will not charge recruitment fees.
12. Grievance mechanisms are readily available.

In addition, REC has drawn up a special Code of Conduct (**Annex 1**) for its employees and also for sub-contractors to make them aware of the company's policy. It needs to be signed to confirm its content is read, understood and will be complied with throughout the duration of their involvement in the project.

7. BRIEF OVERVIEW OF LABOUR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY (H&S)

Legislative Framework

The Ministry of Family, Labour and Social Services is the main responsible organization in this field, in collaboration with other ministries and stakeholders, and is responsible for developing, implementing and enforcing Turkish legislation. The two most relevant units of the Ministry are the Directorate General of Occupational Safety and Health, and the Department of Guidance and Inspection. The Directorate General develops legislation of occupational safety and health in collaboration with other stakeholders, while Department of Guidance and Inspection perform inspections in terms of compliance with occupational safety and health legislation, and also for labour relations and management issues.

The occupational Safety and Health Law includes all workplaces and workers, including civil servants, workers at private enterprises and the self-employed workers; regardless of the number of employees or the kind of work. Providing occupational safety and health services is the responsibility of the employer. The employer, in accordance with legal requirements can provide the services by establishing an occupational safety and health unit in the workplace.

The education, training and placement of occupational physicians, occupational safety expert (OSE) and other health personnel is conducted under the authority of the Ministry of Family, Labour and Social Services, whereas the performance of certification exams was delegated to the Measuring, Selection and Placement Centre (ÖSYM).

The Occupational Safety and Health Law (No. 6331; 2012 (OSH Law)) was published in the Official Gazette in 2012. Before 2012, occupational safety and health issues were regulated in the Labour Law, related regulations and some other general laws. The OSH Law applies to all jobs and workplaces in both the public and private sector, regardless of their field of activities or number of workers, and covers all employees, interns, employers and their representatives.

The ultimate aim of the OSH Law is to prevent occupational diseases and accidents, and other physical and mental health problems of the workers related to work and the work environment. The OSH Law defines the main stakeholders namely employees, employers and the State, and their duties and responsibilities in working life. The Law also defines the basic terminology related to work life such as workplace, hazard, risk, occupational disease, occupational accident, prevention, safety and health unit, occupational safety and health professionals and their responsibilities. According to the OSH Law, the employer should perform risk assessment and has the responsibility of taking all necessary measures to ensure occupational safety and health.

Article 4 of the Law defines the duties, authority and responsibilities of the employer and workers. As per Article 4, the employer has a duty to ensure the safety and health of workers in every aspect related to work. In this respect the employer shall take the measures necessary for safety and health protection of workers, including provision of necessary organization, designating safety and health staff, informing and training of workers, carrying out risk assessment, implementing measures related to occupational safety and health in accordance with the legislation, etc..

As indicated in Article 6 of the Law, in order to provide occupational safety and health services the employer shall designate workers as occupational safety expert, occupational physician and other health staff, meet the need for means of space and time to help designated people or organizations fulfil their duties, ensure cooperation and coordination among the occupational safety and health staff, etc. The OSH Law also regulates workers' right to abstain from work in cases of serious or imminent danger. The OSH Law refers to secondary legislation to for a description of further details to ensure an effective implementation of the Law.

Secondary Legislation

A series of secondary legislation have been adopted to explain the details of relevant laws. Relevant Ministries and organizations took part in the preparation of this legislation, and their opinions were taken into consideration.

"Regulation on Occupational Health and Safety in Construction Works" determines the framework for the minimum occupational health and safety requirements for construction works.

There are also more regulations such as on "noise control", "dust control" or "control of chemicals" where the permissible limits were defined, and some organizational ones such as regulation on "shift work", "occupational hygiene measurements, test and analysis", etc.

The main headings of the Health and Safety Law of the Republic of Turkiye, which must be complied with, are as follows:

- ✓ Prevention of occupational risks;
- ✓ Protection of health and safety;
- ✓ Elimination of risk and accident factors;
- ✓ Training, informing, obtaining opinions and participation of all employees and their representatives on occupational health and safety; and
- ✓ To determine the general principles and other issues related to the working conditions of persons who need special protection due to their age, sex and special circumstances.

Encountering a fatality or an accident with a serious injury

Pursuant to Article 14 of Law No: 6331 (The Law on Occupational Health and Safety);

(1) The employer shall;

- ✓ keep a list of all occupational accidents and diseases suffered by his workers and draw up reports after required studies are carried out.
- ✓ investigate and draw up reports on incidents that might potentially harm the workers, workplace or work equipment or have damaged the workplace or equipment despite not resulting in injury or death.

(2) The employer shall notify the Social Security Institution of the following situations within a prescribed time as follows:

- ✓ Within three workdays of the date of the accident.

- ✓ Within three workdays after receiving the notification of an occupational disease from health care providers or occupational physicians.

(3) Occupational physicians or health care providers shall refer workers who have been pre-diagnosed with an occupational disease to health care providers authorized by the Social Security Institution.

(4) Occupational accidents referred to health care providers shall be notified to the Social Security Institution 6 within ten days at most and authorized health care providers shall notify the Social Security Institution of the occupational diseases within the same period of time.

(5) The procedures and principles as regards to this article shall be defined by the Ministry following the receipt of approval from the Ministry of Health.

Standards for accommodation provided to construction workers
According to Regulation on H&S in Construction Works (Appendix-4:59-65); accommodation places for workers should

- ✓ Be non –flammable;
- ✓ Be away from hazards created by the construction work;
- ✓ Have heating, cooling and ventilation systems, electrical installations and lighting systems;
- ✓ Have sufficient width and sufficient number of tables and chairs, enough bedsteads, beds, blankets, a recreation room; and
- ✓ have an adequate shower, toilet, washbasin, cleaning equipment, etc. facilities.

Requiring H&S Plans for RECs as part of Contractual Procedure
Article 10 of “Regulation on Occupational Health and Safety in Construction Works” specifies the necessity for a H&S plan in Construction works.

Requiring Emergency Response Plan (Fire, Earthquake, Accidents) as part of Contractual Procedure

The “Regulation on Emergency Situations at Workplaces.” defines the rules and procedures for an Emergency Response Plan in the workplace, including preparation, prevention, protection, evacuation, firefighting, first aid and related issues work to be done.

In this context; pursuant to “Regulation on Occupational Health and Safety in Construction Works”; REC should provide the requirements of “Regulation on Emergency Situations at Workplaces.”

Regarding influx of additional population:

- Employment capacity and the qualifications required for the construction will be disclosed to the public to prevent unrealistic expectations; and
- Cooperation will be developed with the local municipalities, non-governmental organizations (NGOs), organizations and local employment agencies.

Regarding increased risk of illicit behavior and crime:

- Workers will be paid adequately to prevent theft potential.
- Workers will be paid into bank accounts.
- Priority should be given to the local labour where possible and practical.

- Worker accommodation facilities will include leisure areas to reduce the interaction of the workers with the local communities.
- Code of Conduct has been developed in compliance with the national legislation (see Annex I). Hard copies will be provided in English and in the native languages of the workforce.

All workers (including expats) will be trained in their native languages about the Code of Conduct and dismissal policy in particular in criminal cases.

Gender, non-discrimination and equal opportunities

Rönesans Holding is among the signatories of the UN Global Compact, which calls on companies to align their strategies and operations with the principles of universal human rights, labour, environment, anti-corruption and adopts principles based on universally accepted statements within the framework of the United Nations Global Compact. They encourage equality in human resources practices by observing transparent and ethical values without compromising its main principles of honesty, competitiveness and innovation. In the Project, all applications are evaluated according to equal opportunity regardless of gender, sexual orientation, race, nationality, ethnicity, social and indigenous origin, religion or belief, disability, or age.

Regarding GBVH:

- A Worker Grievance Mechanism is developed and will be updated by including specific measures to respond to GBVH complaints in a safe and inclusive manner.
- There will be zero tolerance for discrimination on the basis of gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation and all complaints related to such behaviour will be recorded and given serious consideration.
- All staff will be trained on GBVH to promote a respectful and harassment-free work environment for all.

Age of Employment:

Turkish law prohibits anyone under 18 from performing arduous or dangerous work. Thus, no construction workers under 18 years will be employed.

Terms and Conditions:

The Labour Code prescribes for the work week of 45 hours and limits overtime work to 270 hours annually. Wages for each hour of overtime shall be remunerated at one and a half times the normal hourly rate. All project workers will receive at least one rest day (24 hours) after six consecutive days of work. This rest day will be paid.

Terms and conditions for project workers will be in line, at minimum, with this plan, national Labour Law, EBRD's PR 2, IFC PS 2,and General Conditions of the World Bank Standard bidding documents of sub-contractors and comparable industry standards.

- Workers will have written contracts which clearly state the terms and conditions of their employment and their legal rights. Information will include, but not be limited to:

- entitlement to wages, hours of work, overtime arrangements and overtime compensation, and any benefits (such as leave for illness, maternity / paternity or holiday);
- their ability to join trade unions of their choice and right to collective bargaining; and
- contracts will be verbally explained in their native languages to all workers where this is necessary to ensure that workers understand their rights prior to any employment contract to be signed.

- REC will ensure the stated below regarding EBRD PR 2- Human Resources Policies and Employee Documentation:
  - Ensure that their HR policies and employee documentation are written in clear language and made available in the main language(s) spoken by the workforce;
  - Document and communicate terms of employment to workers in writing, usually in the form of a written contract of employment;
  - Ensure that workers are familiar with and understand their terms and conditions of employment, including the period of employment, wages, hours of work, overtime arrangements, grievance procedures, and any benefits (such as leave for illness, maternity/paternity or holiday);
  - Ensure that any material changes to their terms and conditions of employment are substantively and procedurally consistent with national law on modification of contract of employment; and
  - Ensure that any record-keeping and document collection respects the rights of workers to privacy and data protection.

- Cultural Awareness Training will be provided as an on-boarding requirement to all non-local workers, and in particularly foreign workers.

8. GENDER-SENSITIVE WORKER GRIEVANCE MECHANISM

8.1. Introduction

The specific objectives of the worker grievance mechanism are as follows:

- To provide a gender-sensitive and transparent process for female and male workers to express grievances, including anonymous complaints with the intention of resolving grievances promptly, effectively and amicably, without retribution.
- To establish roles and responsibilities regarding worker grievances and establish a course of action to manage the grievances in a timely manner, including a worker grievance committee.
- To establish a third-party referral mechanism for GBVH and other gender-sensitive grievances for the workforce.

Management will treat all grievances seriously and take prompt and appropriate action in response. This grievance mechanism does not replace other channels for grievance resolution as defined by law or collective agreements.

This mechanism is based on the standards and specific guidelines produced by the Turkish Government, Ronesans Holdings Board, the International Finance Corporation (IFC), the EBRD, and the Equator Principles regarding grievance management.

External grievances from PACs and other stakeholders will be addressed by a gender-sensitive external grievance mechanism.

8.2. Scope and Definitions

This procedure is available to any employee or worker engaged by the Project, its contractors and sub-contractors, whether full-time or part-time, on fixed term or open-ended employment contracts under Turkish employment law.

A grievance refers to any problems and issues that employees experience over the course of their employment. This includes, but is not restricted to, concerns regarding recruitment, wages, working hours, working conditions, worker accommodation and GBVH.

A gender-sensitive worker grievance mechanism acknowledges gender differences, issues and inequalities, and considers them in the design and implementation of strategies and actions[4]. It recognizes that remediation may differ depending on the gender of the complainant.

8.3. Application

This procedure applies to the Project site, Ronesans Holding offices and facilities, contractors sites and camps, during pre-construction, construction, operation and closure phases. Consultation on the procedure will be carried out prior to implementation to ensure that it considers the needs of the workforce. It will be reviewed quarterly in light of the contributions and/or comments from the employees or their representatives, as well as the results of the periodic monitoring and evaluation by the HR department to improve the performance of grievance management.

SPV HR Department, is the holder/owner of this procedure; however, REC is responsible for the day-to-day implementation of the procedure and all services will be called upon to propose solutions aimed at improving the company's performance. No individual, department or sub-contractor can resolve the grievances without the involvement of the SPV HR Executive and the Project HR Chief.

8.4. Grievance reporting channels

Grievances can be raised verbally or in writing, directly or indirectly using various sources. All grievances (including those raised by suppliers' and sub-contractors' workforce) will be treated as confidential regardless of how they are reported.

Informal Grievance Reporting

Managers and employees are strongly encouraged to use informal methods to resolve disagreements or disputes.

4 UN-REDD, 2022, Glossary, Gender Sensitive. (available at: https://www.un-redd.org/glossary/gender-sensitive)

- **Discussion with manager**. If employees have a reasonable grievance or complaint regarding their work or the people they work with they should, wherever possible, start by talking it over with their manager. It may be possible to agree a solution informally between worker and manager. This makes it more likely that disputes can be resolved faster and closer to the source of the problem.
- **Discussion with HR team**. Where discussions with line managers are unsuccessful, it may still be possible to resolve the issue informally without triggering a formal procedure. For example, the HR team may be able to host an informal meeting or correct any wrong or incomplete information.
- **Discussion with Gender Lead or Focal Point**. This may apply for grievances raised regarding GBVH, discrimination, or other gender-specific issues prior to making a formal complaint. The worker may want initial advice or obtain support with reporting the incident.
- **Anonymously through a third-party:** REC will identify an independent service provider to support with anonymous gender-sensitive grievances, such as GBVH and discrimination.
- **Free hotline** (0 800 655 10 00): The centralized toll-free hotline service is available for everyone to submit grievances and recommendations. The number will allow as an option to report GBVH related grievances to female community liaison officer.
- **Social Media**: SPV will set up an Instagram page and disseminate it to the public. In addition to the relevant information about the main progress of the project, the page will also give everyone the opportunity to give feedback and/or make complaints.

Formal Grievance

- **In writing to his/her manager**: This submission should be factual and avoid language that is insulting or abusive. Where the grievance is against the employee's manager and the employee feels unable to approach them, the employee should address the grievance to another manager or the HR department.
- **Through the worker grievance committee:** It is important to note that some individuals and groups might feel more comfortable if they can express their problems through their workplace representatives.
- **Through National Grievance Mechanism:** CIMER (Turkiye Presidential Communication Center), Alo 170
- **Through Trade Unions:** YOL-İŞ, DEV YAPI- İŞ, İNŞAAT – İŞ, ÖZ İNŞAAT – İŞ, YENI YOL- İŞ, İYI- SEN, İNŞAAT-SEN, MES-ED-SEN, DAYANIŞMA
- **Through local authorities:** Mayor of Istanbul Metropolitan Municipality and relevant departments such as Directorate of City Planning, Istanbul Governorship, General Directorate of Highways, Istanbul Provincial Directorate of Environment and Urbanization (PDEU), Istanbul Provincial Disaster and Emergency Directorate etc.

8.4.1. Steps to resolve the grievance

Reporting a grievance

Verbal or written grievances should be submitted to the HR department. The following information must be collected and recorded:

- Description of the grievance.
- First name and surname of the complainant.
- Means of contact (or phone number).
- Date when problem occurred.
- Gender.
- Employee number
- Address
- Department or individual responsible for causing the problem, if known.
- Person responsible for managing grievance

When the grievance is lodged with HR Chief, the latter will be able to determine whether the grievance can be resolved immediately, if this is the case, record the grievance and the solution in the grievances register, and close it immediately. The HR department must then inform the Construction/Project Manager.

Registration of grievances

- Register the grievance in the grievance register.
- Classify the grievance based on subject, using the classification system: 0. Non-justifiable, 1. Negligible, 2. Minimum, 3. Moderate, 4. Serious, 5. Catastrophic
- Notify the Department responsible for causing the grievance.
- Write an acknowledgement letter if the grievance was received in writing.
- Reevaluate the severity of the grievance once the investigation has been completed.

Investigation and treatment of the grievance

HR Chief will oversee Worker Grievance Mechanism implementation, ensuring that it is accessible to all workers and are informed of it at the time of hiring, supporting and coordinating grievance resolution, and reporting to the Social Manager on the implementation of the mechanism;

- The HR Chief will assign the treatment of the grievance to a competent officer of the HR team. It is important that the same officer handles the grievance until its closure.
- The designated office will inform the claimant that the usual time to resolve the grievance is 14 to 20 days. They will discuss the issue with the claimant and obtain the maximum information from the person who filed the grievance.
- This additional information will allow the HR officer i) to determine whether the grievance is legitimate; ii) confirm the severity of the grievance; iii) determine the frequency of occurrence; and iv) understand how best to resolve the matter.
- If a grievance is deemed to be not justified, the matter will be closed and

recorded as such in the grievance log

- If the grievance is justified, the HR team, will note in the grievance register, the steps that will be taken to resolve the grievance.
- In collaboration with the employee and the concerned department, the officer will identify a solution.
- Each formal encounter made to the claimant will be recorded (nature of the action and date). This will be noted in the grievances register.
- Once approved, the proposed solution is formally communicated to the claimant and any other stakeholders involved.
- If the resolution of the grievance involves the payment of financial compensation or in-kind compensation (e.g., in the case of wage arrears), the claimant will sign an attestation when such compensation is paid.

Closure

Project HR Chief will determine if the grievance has been closed to the satisfaction of the claimant. Once it has been closed, the information will be entered into the grievances register.

Grievance will be closed with the signage of the complaint closure form by the complainant. Once it has been closed, the information will be entered into the grievances register and the grievance committee will be informed.

Appeals

Where the employee is not satisfied with the initial decision about the grievance and wishes to appeal, he/she should advise the grievance manager.

The HR Chief will ask the Project Manager in their capacity as chair of the Grievance Committee to meet with the employee and propose an alternative solution. If the proposed solution satisfies the employee, the grievance can be closed. The Project Manager will review the materials and make any additional enquiries as deemed necessary, or direct another person to make those enquiries on their behalf. This process should take no longer than 1 week from the date on which the General Manager receives the grievance information.

If the alternative solution proposed by the Project Manager is also rejected by the claimant, the HR Chief will inform the claimant in writing and make them aware of alternative methods of resolving the grievance outside of this mechanism in 1 week.

At each stage of the resolution, the HR Chief will inform Project Manager.

All meetings with the claimant and Ronesans management will be recorded in the grievances register. If the grievance is still not resolved at the level of the grievance committee the /Project Manager will contract the Project Director/CEO prior to resorting to the legal system.

8.4.2. Anonymous worker third-party referral pathway for GBVH

A third-party referral mechanism will be established for workers to report GBVH and other sensitive grievances that they may not feel comfortable addressing through the general grievance mechanism.

Identifying an Independent Service Provider (ISP)

The third-party or ISP will provide the following services:

- Act as a neutral entity and focal point for workers to report alleged cases;

- Coordinate investigations confidentially and fairly;
- Provide or coordinate social protection services for workers (e.g., restraint orders or safe housing, in extreme cases);
- Provide or organize counselling to survivors; and
- Provide or organize mediators to resolve conflicts between the survivor and alleged perpetrator.

REC, in collaboration with the Federation of Women's Association of Turkey (Türkiye Kadın Dernekleri Federasyonu) will identify a shortlist of potential ISPs are actively working in Istanbul and surrounds to provide services based on their experience and capacity. Once a short-list has been developed, REC will send them a Terms of Reference (ToR) to demonstrate their ability to provide these services. Police background checks on the selected ISP will be required to validate their capability to support REC. Once selected, a contract will be established between REC and the ISP, including scope of work and associated timelines, costs, and REC performance monitoring requirements.

GBVH reporting

REC will work with the selected ISP to develop an appropriate reporting template that includes the type of grievance, description, gender of the complainant, resolution and status (i.e., open, closed, in progress). Complainants should be able to contact the ISP directly via a free hotline or by email. They may choose to maintain anonymity or reveal themselves, e.g., if the case needs to go to court. All GBVH related cases will be reported to EBRD (and the other Lenders as appropriate) immediately by SPV. Data will be submitted to REC quarterly to monitor trends and enhance mitigation measures, where required.

GBVH investigations

GBVH investigations will be carried out by a professional and a minimal number of people to ensure that it is done safely without risk to the survivor and alleged perpetrator.

Depending on the nature of the incidents reported and the needs of the survivor, the ISP may refer the case to another GBVH provider. REC will be notified of referrals and associated costs. The ISP will maintain a list of providers, their capacity and background check reports for REC's approval.

ISP Information management

The ISP will store information securely and confidentially, as follows:

- The names of survivors and perpetrators will remain anonymous. If needed, cases will be documented and discussed using a code system.
- A template will be developed to capture gender-sensitive grievances in a way that can be used for tracking the status and for monitoring purposes. Electronic information will be password protected and papers in a locked cabinet.
- Survivors will be asked for their consent before any information about them is shared.
- Only personnel who are directly responsible for managing a case will have access to associated information.
- Information will only be shared on a need-to-know basis to prevent identities from being exposed.

A protocol for information management will be developed for the ISP by REC as part of the contract. This will also be reviewed during monitoring to check for compliance with the protocol.

8.4.3. Grievance Management Roles and Responsibilities

The specific responsibilities associated with grievance mechanism for the Project are shown in the table below.

Table 3.Grievance Management Roles and Responsibilities

Role	Responsibility/Accountability
Construction Manager (CM)	• The Construction Manager will be responsible for the day-to-day operations. The CM reports directly to the Project Manager, oversees site work and liaises with the construction team. • The CM's responsibilities include: ○ Ensuring that all Supervisors and employees are familiar with the contents of the GM. ○ Reporting to Project Manager on all accidents and incidents and corrective and preventative measures. ○ Reporting regularly to the Project Manager on major grievances or concerns raised by the workforce with respect to the project.
Human Resource Chief	• The HR Chief will oversee the implementation of the Worker Grievance Mechanism, ensure that it is accessible to all workers and that all workers are informed about the Grievance Mechanism at the time of their hiring, support and coordinate responses to worker grievances, and report to the Social Manager on the implementation of the mechanism. • The HR Chief will directly report to the Project Manager. Key responsibilities include: ○ Act as the custodian of the internal GM specific to the Project and be responsible for the documentation and updates. ○ Support and coordinate specific responses to grievances where they are approved. ○ Supervise/monitor and coordinate activities with sub-contractors to ensure that they have a GM and comply with any findings, recommendations or compensation that arise from its application. ○ Especially ensure the identification of and reaching out to vulnerable employees or those of the sub-contractors. ○ Receive feedback on the performance of the GM as a whole as well as progress on individual grievances. ○ Ensuring that Project's employees are informed and trained on the GM.

Role	Responsibility/Accountability
	○ Ensuring HR team reports grievances on time and with the expected and agreed points. ○ Providing resources to ensure that workforce representatives are represented and taken into consideration at the level of the grievance committee.
CLO	• Will assist the Project HR Chief in implementing Worker Grievance Mechanism; • Will assist Project HR Chief in keeping records regarding all worker grievances, including nature of grievance, timeframe for addressing and actions taken in response; • Support the project manager and HR chief in tracking the outcome of complaints and keep records to report to the project manager weekly, monthly and annually. • Will assist Project Manager and HR Chief in disseminating Grievance Mechanism among workers.
	•

8.4.4. Workforce awareness and training on Grievance Mechanism

All Project staff involved grievance management will be required to attend training, which will include:

- Applicable definitions, including gender-related terminology/concepts; (e.g., gender, gender-sensitive, GBVH, etc);
- Worker grievance model;
- GBVH management and referral pathways;
- Roles and responsibilities; and
- Monitoring and reporting requirements.

Additionally, inductions will include a module on the worker grievance mechanism, the code of conduct and GBVH prevention.

Notices regarding the worker grievance model will be placed on notice boards in the worker camp and working areas for continual awareness raising.

8.4.5. Grievance Monitoring Indicators

Gender-disaggregated data stored in the Project grievance register will help to identify gender-specific trends over time, enabling REC to mitigate and address concerns in advance. Additionally, the Project ISP will collect data to support REC monitor the usage and performance of their services.

Table 4. Grievance Monitoring Indicators

Responsibility / Metric	Information source
REC	
• Total number of grievances opened, closed, or pending	• Grievance register
• Number of days taken to resolve grievances	• Grievance register
• Nature of grievances	• Grievance register
• Demographic information such as the age, gender, and designation of the complainant	• Grievance register
• Number of males and females in worker grievance committee	• Meeting register
• Worker satisfaction of GM and ISP, including user accessibility, usage and effectiveness	• Workforce engagement and anonymous surveys
• Workforce awareness on GM and ISP	• Workforce engagement and anonymous surveys
• Number and nature of cases referred to ISP	• Grievance register and ISP
• Total number of grievances opened, closed, or pending	• Grievance register
• Number of days taken to resolve grievances	• Grievance register
• Nature of grievances	• Grievance register
ISP	
• Number and nature of cases opened, closed, or pending	• ISP register
• Number and nature of REC alleged cases	• ISP register
• Number of court cases	• ISP register
• Visibility of communication materials in working areas and accommodation regarding ISP services	• Observations
• Number of sensitisation meetings and workshops held with workers	• ISP meeting registers
• Number and nature of referrals to other GBVH service providers	• ISP register

9. MANAGEMENT OF SUB-CONTRACTORS AND SUPPLIERS

9.1. Sub-Contractors

All contracts with sub-contractors will make explicit reference to the need to abide by EBRD PRs, IFC PSs and ILO conventions, including in relation to labour and welfare standards, freedom of association, non-discrimination and child and forced labour. All contracts with sub-contractors will include provisions related to labour and H&S, as provided in the EBRD PRs, IFC PSs and Turkish Law.

Contractor contracts will establish the right for SPV. to monitor and audit all contractors and sub-contractors and the consequences for the contractor if they are found to be breaching national legal requirements, international standards, SPV's policies or clauses in the contract. Contractor contracts will specify that the same standards will be met by their sub-contractors and suppliers.

All Project parties will require all contractors to sign an anti-corruption and responsible procurement policy, and require all workers to sign the 'Project Code for REC's personnel' (See Annex I).

REC Management will ensure that each sub-contractors will develop their own Labour Management Procedure based on the requirements of this LMP. The Labour Management Procedures of sub-contractor will be available for review.

Prior to engaging new sub-contractors, REC will assess the past performance of contractors with regard to employment and H&S and establish their current capacity to implement the necessary requirements under this LMP. REC will require sub-contractors to submit their labour management policies and procedures and information on occupational health and safety practices. Based on the documents collected, REC will conduct due diligence on the sub-contractors and confirm that they have the capacity and approaches to comply with the requirements of the Contractor Management Plan

Regarding Ronesans HR Management System, HR based at Headquarters is responsible of efficient labour management of REC personnel and Project HR Chief is responsible of efficient labour management of sub-contractors. S/he will control compliance of HR Policy and this LMP at least monthly (frequency can be increased where there is a non-compliance) with Sub-Contractor Monthly Progress Control Approval Form.

The HR Chief is responsible for reviewing and approving the related data on:

- Information in public records, for example, corporate registers and public documents relating to violations of applicable labour law, including reports from labour inspectorates and other enforcement bodies;
- Documents relating to a labour management system, including H&S issues, for example, labour management procedures, and gender and GBVH policies;
- Monthly checks of Sub-Contractor Monthly Progress Control Approval Form (Records of legally required worker benefits and proof of workers' enrollment in the related programs and worker payroll records, including hours worked and pay received)
- Daily check of HR List; and
- Workers' certifications/permits/training to perform required work; (with the coordination of technical departments' managers).

Purchasing and Technical Office departments are responsible for

- Copies of previous contracts with RECs and suppliers, showing inclusion of provisions and terms reflecting IFC PS2 and EBRD PR2; and
- Business licenses, registrations, permits, and approvals.

Project HSE Manager is responsible for reviewing and approving the related data:

- Identification of safety, and health personnel, their qualifications, and certifications;
- Records of safety and health violations, and responses;
- Accident and fatality records and notifications to authorities; and
- Identification of safety committee members and records of meetings.

The Project HR Chief will

- Manage and monitor the performance in relation to contracted workers of sub-contractors; and
- Focus on compliance by RECs with their contractual agreements (obligations, representations, and warranties), under terms of references that is agreeable to the Bank.

The Project HR Chief's monitoring may include periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labour management records and reports compiled by RECs.

RECs' labour management records and reports may include:

- a representative sample of employment contracts or arrangements between third parties and contracted workers, with consideration of gender;
- records relating to grievances received and their resolution, including GBVH allegations;
- reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions;
- records relating to incidents of non-compliance with national law; and
- records of training provided for contracted workers regarding labour and working conditions and H&S for the project.
- Quarterly labour audits by independent third party will be carried out and reported.

9.2. Suppliers

REC has developed and enacted a separate Supply Chain Management Plan, with measures to identify and mitigate supply chain risks, including those related to child labour, forced labour, and GBH, including trafficking. As part of this plan, it will conduct a mapping of all primary suppliers in Turkey that manufacture highway line construction materials.

As part of the selection process, REC is required to conduct due diligence on suppliers that assesses accusations or sanctions, and mitigation measures in place to address such risks.

Where supply chain risk assessments identify the presence or significant risks of child labour or forced labour in the primary supply chain in contravention of ILO standards, or where significant risks of child labour or forced labour are reported in lower tiers of the core supply chain, appropriate steps will be taken to remedy this in accordance with IFC's PS 2 and EBRD's PR 2.

10. MITIGATION MEASURES

Recruitment plan - Temporary Direct and Indirect Employment

SPV and the REC will ensure that the recruitment process (including sub-contractors and suppliers' recruitment process) is fair and transparent, public, and open to all regardless of ethnicity, religion or gender and in line with Local Recruitment Plan.

If labour agencies or intermediaries are used, reasonable efforts will be made to ensure that they have systems in place to comply with the above terms of this LMP, including that workers are not charged and recruitment decisions are fair, transparent and non-discriminatory.

- SPV and REC will work with local authorities (such as İŞKUR), vocational colleges, universities and employment organisations to ensure that all temporary positions are advertised in a manner that is accessible to the communities in the AoI.
- SPV and REC is committed to employ 5% of people from vulnerable groups (applicable for temporary employment) such as low-income households, refugees, young people, ethnic minorities.
- Women and men will be evaluated according to the same standards. Priority will be given to female employees where they are under-represented, if they meet the expected qualifications. Pay will be based on the principle of equal pay for equal value.
- Specific measures will be developed by sub-contractors to facilitate access to employment for vulnerable people (including women and youth) to include:
    - applying a gender quota to ensure women are represented in the pool of candidates or workers;
    - use inclusive vocabulary in job descriptions in order to encourage women to apply; and
    - Collaborate with local employment agencies.
- Stakeholder Engagement Plan will be implemented to outline how SPV will ensure regular, open and transparent communication with all stakeholders.
- Stakeholders will also be able to report directly to the Project via Grievance Mechanism about their expectations and concerns related to the local economy and employment.
- To maximise capacity enhancement and transfer of knowledge to local contractors and their employees, SPV will develop formal training programs and formalise on-the-job trainings to the extent possible, including learning targets and performance monitoring.

Procurement

- Procurement will be executed in line with Supply Chain Management Plan. Related measures will be monitored and reported by SPV will implement a phased capacity building programme (sector by sector) that will enable local companies to achieve qualifications and potentially certification with the relevant standards and requirements well in advance of the tendering process.
- SPV and REC will engage with the local government, and other organizations to determine opportunities for targeted training.
- Any selected potential suppliers will have to meet health, safety and quality standards of the Project, including gender equality and GBVH.
- Following selection of primary contractors, and prior to the start of construction, SPV and REC will carry out trainings for contractors focused on the Project's E&S

requirements including HSE, gender equality and GBVH, socioeconomic and health policies.

Labour and Working Conditions / Workers' Rights

Measures will be taken to ensure that all workers are provided with clear and understandable information regarding their labour and working conditions in line with this LMP and Turkish legislation. This includes verbal and written information at the time of hiring and as part of their induction training, as well as information posted on project sites (e.g. clear posters and signage) and provided during ongoing refresher sessions (e.g. during regular toolbox talks).

Labour and working conditions and rights include:

- Workers will be provided with reasonable working conditions and terms of employment in compliance with national legislation and the applicable standards;
- Employment, compensation/remuneration and working conditions will be provided, including working hours, based on equal opportunity and fair treatment, avoiding discrimination on any aspects;
- Freedom of association will be guaranteed without penalty and in conformance with Turkish laws.
- All workers (including those of contractors and sub-contractors) will be able to join unions of their choice and have the right to collective bargaining, and will be informed of these rights;
- All workers (including those of contractors and sub-contractors) will have contracts which clearly state the terms and conditions of their employment and their legal rights;
- A program of socioeconomic compliance monitoring will be implemented to inform internal auditing and monitoring process. KPIs will be defined for worker rights, discrimination and management, gender-sensitive workforce grievance mechanism and monitoring of outcomes;
- Performance will be taken with regard to health and safety, worker management and rights as outlined in Turkish law and ILO international standards into consideration; and
- The outcomes of community engagement, media coverage and its workforce and Community Grievance mechanism will be reviewed and monitored for additional indications of labour-related issues that may arise.

Occupational Health and Safety

REC will give a high priority to Occupational Health and Safety management. Occupational health and safety will be the responsibility of all. Occupational Health and Safety performance, which is managed at the project site level, is of critical importance for the health and safety of everyone working on the project.

REC will coordinate with various sub-contractors working at the project site. It will convey all the procedures and principles before it starts working on the project site. Sub-contractors are expected to comply with current legal obligations, good working practices and REC procedures, which will be brought to the attention of site personnel and interested parties before they start work on the Project.

Accidents, incidents and near misses will be immediately reported to the REC H&S unit. Except for the notification made to the H&S Unit, the accidents that must be reported to the Social Security Institution due to legal obligations will be made by sub-contractors in accordance with the specified legal framework and within a period of time. (These must be notified within 3 working days at the latest.)

The project's HSE culture and awareness will be shared in the Recruitment and Orientation induction training sessions and programmes on the HSE system and practices, including gender differentiated risks.

If any employee witnesses an unsafe situation or find themselves in a hazardous situation, they will report this immediately to their supervisor or the site management when it is safe to do so.

The overall HSE objectives are:

- Zero accidents;
- No harm to employees (REC-Sub-Contractors) and visitors;
- No damage to any property; and
- Strict compliance with applicable regulations and project creditor requirements.

All Occupational Health and Safety team members involved in the project will be approved by the REC Occupational Health and Safety Manager/H&S Chief on the basis of competence (experience, training, certificate, etc.). Attention will be paid to the fact that the personnel who will work in the REC International H&S norm staff have a minimum of 3 years of experience. A sufficient number of occupational safety experts will be appointed to the companies through JHSU in accordance with their hazard management classification. In addition to the legal experts and REC H&S Unit employees, if deemed necessary according to the work performed, the sub-contractors may be requested to have an occupational safety expert employed within their own organization.

Detailed H&S requirements are listed in Health and Safety Plan.

Forced labour and modern slavery

- The REC and Operator will prohibit the use of forced labour by ensuring full compliance with national legislation and the provisions of relevant conventions and other applicable international standards.
- In order to prevent modern slavery, these preventive actions will be taken by RECs and sub-contractors:

  For direct workers:
  - Not employment of forced labour or trafficked persons.
  - Establish effective worker grievance mechanisms.
  - Uphold principles of non-discrimination and equal opportunity.
  - No discouragement or restriction of freedom of association and collective bargaining.

  For contracted workers:
  - Take commercially reasonable efforts to make sure the third parties who engage workers are reputable, legitimate enterprises and have appropriate

management systems that will ensure there is no forced labour or employment of trafficked persons.

- Establish policies and procedures for managing and monitoring the performance of such third-party employers on labour issues.
- Use commercially reasonable efforts to incorporate these requirements in contracts with third-party employers.
- Ensure that contracted workers have access to a grievance mechanism.

For supply chain workers:

- Undertake a risk assessment to identify where there are high risks of forced labour in the primary supply chain.
- If forced labour cases are identified, take steps to remedy them.
- Monitor the primary supply chain to identify significant changes in risks.
- Where remedy is not possible, shift the project's primary supply chain over time to reduce the risk of forced labour.

- In addition, no employee's passport will be retained or confiscated labour for or by REC or its contractors.
- The REC will not employ nor permit any sub-contractor to use child labour,
- The REC will prohibit the use of forced labour by ensuring full compliance with national legislation and the provisions of relevant conventions and other international standards. These measures will be reflected in the Project's Employment Plan Document.
  - Workers are paid their wages in full and on time.
  - Workers are not charged recruitment, processing or placement fees to obtain employment which entail a significant debt that can only be repaid by continued employment with the same employer.
  - Only reputable recruitment and employment agencies are used, and there are procedures in place to check their practices and policies.
  - Workers are provided with written terms and conditions of employment and benefits for their review and signature before they begin work; and for migrant workers, this should be before they leave their home country.
  - Workers retain control and possession of their passports and other personal documents.
  - Workers are free to leave the worksite and their accommodation when they are not working.
  - Workers are free to leave their employment without penalty on giving reasonable notice (in accordance with national law).
  - Workers are not forced to work overtime above national limits.

Child labour

REC will not employ nor permit any sub-contractor to use child labour, and in accordance with Turkey legislation, any person under the age of 18 may not be assigned to any hazardous work within the Project. A risk assessment will be carried out for any workers aged under 18, and a system to monitor their health and working conditions.

The REC will be required to verify the identify and age of all workers, and will keep a register of any workers aged under 18. Workers will be required to provide official documentation,

which could include a birth certificate, certificate based on the results of a medical examination, national identification card, passport.

If a child under the minimum age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child.

Gender, non-discrimination and equal opportunities

In the Project, all applications are evaluated according to equal opportunity regardless of gender, sexual orientation, race, nationality, ethnicity, social and indigenous origin, religion or belief, disability, or age.

- Local Recruitment Plan will be implemented ensuring that the recruitment process is fair and transparent, public and open to all regardless of ethnicity, religion or gender.
- REC will provide equal opportunities to women and men in all of their branches and operations.
- Job postings will be prepared using an anti-discrimination language, and recruitment processes will be carried out in a transparent and accountable manner. In case the recruitment is done through an agency, the agency will not charge any fee from the employees.
- Measures will be put in place to encourage female participation in the indirect workforce, such as providing specific training where required, enabling flexibility and job-sharing opportunities for women with children to participate. SPV and REC will ensure that sub-contractors develop specific measures to facilitate access to employment for vulnerable people, including women and youth, which will include gender quotas, collaboration with local employment agencies and inclusive language in job advertisements.
- Local people and mukhtar affected by the project will be informed about employment opportunities and women will be encouraged to apply for job opportunities.
- Vacancies will be published (listing the required qualifications for all categories of employment) within project-affected communities.

- Accurate records will be kept of the number or percentage of men and women labour days and salary for skilled and unskilled labour;

Monitoring criteria will be as follows:

- Workforce statistics
- Grievance records
- Workforce statistics

Gender-Based Violence, Harassment and Inequalities

GBVH comes in several forms including verbal and emotional abuse, sexual harassment and exploitation, and physical abuse, including rape. A Gender Strategy will be adopted by the project that will include the following measures to address GBVH in the workplace:

- In consultation with workers and their representatives, a workplace policy on GBVH will be implemented;
- Adopt a zero-harm approach to GBVH in the workplace and include in the Code of Conduct;
- Conduct a workforce and contractor engagement programme to raise awareness of GBVH, prevention measures, and worker responsibilities. This should also be incorporated into the worker induction;
- Place notices in workspaces to raise awareness about GBVH with associated hotlines/contact numbers for incident reporting;
- Include gender-specific requirements in the bidding documents and contracts, such H&S requirements and labour rights;
- Monitor Core Labour Standards (CLS) enforcement monthly and reflect this information in the regular reporting.
- Apply a gender-sensitive approach to the risk assessment for specific work tasks and ensure that all female employees are provided with PPE that is appropriate for women's physiques.
- Identify and assess hazards and risks of GBVH with the participation of workers and their representatives during toolbox talks and team meetings;
- Incorporate GBVH and associated psychosocial risks in the management of occupational health and safety;
- Implement a gender-sensitive grievance mechanism that provides an anonymous and third-party referral pathway to address GBVH risks and other gender-specific risks;
- Establish a gender institutional structure that includes a Gender Lead and focal points to implement the Gender Strategy.
- Undertake a gender training programme for team leaders and gender focal points to support implementation of the Gender Strategy.
- Undertake bi-annual anonymous workforce surveys that include questions regarding their experiences and observations of GBVH to identify unreported incidents and enhance mitigation, where required.
- A GBVH policy has been developed and all project workers will be made fully aware of the expected behaviour both at work and outside working hours by reading and signing the 'Project Code for REC's personnel' (See Annex I). During the construction phase, HSE plans and procedures also include requirements for induction and training on expected behaviours and on disciplinary procedures (including dismissal procedures for unacceptable conduct).
- Specific provisions will be implemented in the Worker Grievance Mechanism to manage grievances related to GBVH (e.g. the complainant will be able to communicate

the grievance to a person of its preferred gender, for example, if a woman prefers to explain the grievance to another woman, that will be possible).

- Local Recruitment Plan ensuring that the recruitment process is fair and transparent, public and open to all regardless of ethnicity, religion or gender. The Recruitment Plan will also take into account GBVH risks in local communities near project sites related to labour influx.

Child Labour and Forced Labour in the Supply Chain

- REC has developed a separate Supply Chain Management Plan and will implement it, with measures to identify and mitigate supply chain risks, including those related to child labour, forced labour and risks of harm to workers (see also Section 9).
- SPV and REC will oversee if suppliers comply with all applicable child labour laws and only employ workers who meet the applicable minimum legal age requirement in accordance with international standards.
- Contractor contracts will specify monitoring to be undertaken by the contractor, establish the right for the Project monitoring and auditing of all contractors and sub-contractors and the consequences for the contractor if they are found to be breaching national legal requirements, international standards, policies or clauses in the contract regarding forced child labour. Contractor contracts will specify that the same standards will be met by their sub-contractors and suppliers.
- In all contractor contracts SPV and REC will make explicit reference to the need to abide by Turkish law and international standards in relation to child labour.

Worker accommodation

The Camp Management Plan has been developed for the construction phase and will align with standards set out in the IFC/EBRD guidance note, “Standards and processes for Workers' accommodation: processes and standards”.

The Camp Management Plan:

- Sets out clear roles and responsibilities for REC and sub-contractors;
- Specifies the expected housing and management standards required at the accommodation, with consideration for gendered needs, such as female and male segregated accommodation with lockable doors, gender segregated toilets and shower facilities, menstrual hygiene facilities (e.g., sanitary bins, running water, spacious and lockable cubicles, provision of reusable sanitary pads (where needed)), segregated social spaces, adequate and safe lighting, security cameras, and other measures, where required;
- Sets out guidelines for monitoring the implementation of the plan at all accommodation sites, including having separate focus group discussions with the workforce on the design and standards;

- Provide for reporting mechanisms and requirements for contractors to submit regular reports on the application of and compliance with standards in the plan;
- Measures to review the Camp Management Plan on a regular basis and make necessary amendments, with female and male workforce participation.

Inspections will be conducted to verify that camps are operating in line with the standards set out in the Plan and will be detailed in the Camp Management Plan. Inspections will be made daily, weekly and monthly. Quarterly independent labour audits will be carried out to assess the implementation of PR 2 and this LMP requirements in line with the ESAP.

The Plan will include measures for the design and management of the camp to ensure adherence to international standard for providing a safe environment that is clean, and adequate sanitary. Regular monitoring will cover at a minimum:

- Waste management;
- Provision of potable water;
- Transportation facilities;
- Use of security management systems;
- Emergency response facilities;
- Provisions of minimum amount of space for each worker;
- Sanitation and washing facilities, including menstrual hygiene management facilities;
- Cooking facilities (separate area for the foreign personnel, if necessary) and food safety in canteens;
- Provision of first aid and medical facilities;
- Provision of heating and ventilation;
- Pest control;
- Maintenance of buildings; and
- Relations with surrounding communities, including risks of GBVH.

No deductions will be made from the salaries of the employees for the accommodation and food services to be provided to the employees.

Retrenchment Plan: No collective dismissal or retrenchment is planned in the Project. It should be noted that retrenchment does not include fixed term or temporary contracts that would be used by REC or subcontractors. Based on national requirements on retrenchment, the project will follow the steps identified below:

- In case of a collective dismissal required, this plan will be used to mitigate adverse effects of job losses on the workers concerned. Retrenchment of workers, if necessary, will be undertaken in line with national law and international best practices, and will include providing skills to enable individuals to secure alternative employment:
    - Collective dismissals will always be carried out in accordance with the provisions of national law and applicable collective agreements.
    - REC will carry out an analysis of alternatives to retrenchment.
    - REC will consult with trade unions or other workplace representatives over the proposed redundancies. Consultation should be about avoiding or reducing redundancies, the method of selection and mitigating the effects of the

redundancies. The outcome of the consultation should be reflected in the final retrenchment plan.

- REC will ensure that the criteria for selection for redundancy are objective, fair and transparent. In particular, the client will aim for a gender-neutral impact in the restructuring.
- REC will implement a procedure which provides individuals with the right to challenge their selection.
- REC will pay all outstanding back pay, social security benefits and pension contributions and benefits to those affected by retrenchment in a timely manner.
- REC will notify the EBRD (and other Lenders, if required) one month in advance of the implementation of all redundancies covered by PR2 and, in the case of large-scale redundancies, also provide the EBRD with a copy of the retrenchment plan in advance of dismissals.

- The effectiveness of all retrenchment should be monitored including the timely close out of retrenchment-related grievances.

Demobilisation Plan

SPV and REC will develop a Demobilisation Plan for the project workforce for the construction phase in coordination with all core sub-contractors, a minimum of 6 months before the completion of works[5]. The actual time period before completion may vary beyond 3 months to meet the requirements and adapt to the circumstances at the time of demobilisation.

The plan should identify how many workers will be affected and set out opportunities to re-engage or re-deploy workers to other projects where possible. Where job losses are unavoidable, the plan should set out measures to ensure that any demobilisation is carried out in accordance with statutory requirements, provide demobilised workers with information and guidance regarding access to public employment services and unemployment benefits, and potential active measures to support workers (e.g. training, job search assistance).

11. MONITORING, ASSURANCE AND VERIFICATION

The following criteria will be followed and monitored by SPV Social Manager with respect to all sub-contractors and project workers:

- Worker contracts in line with Turkey Law, IFC PS2 and EBRD PR2;
- Labour Audit Report(s);
- Training Records; and
- Workforce statistics.

KPIs specified in this LMP will be managed collected by HR Chief and reported to SPV Social Manager for verification and evaluation in accordance with their responsibilities set forth in this Plan and REC-İSG-ÇYS-KMO-PR-09 HSE Monitoring, Assurance and Verification Procedure.

The following table shows the key performance indicators for monitoring the work- related aspects of the project. KPI's related with health and safety are stated in Health & Safety Plan and will be managed and collected by REC H&S Manager and reported to SPV HSE Manager

for verification and evaluation. Labour specified KPIs should be gender-disaggregated to identify areas that may affect women or men specifically and need to be enhanced in Project mitigation.

Table 5. Key Performance Indicators

Personel Selection and Employment				
Subject	**KPI**	**Target**	**Period**	**Responsibility**
Wages and working conditions.	Number of worker grievances not closed out within the target timeframe (by gender)	Zero worker grievances not closed out within the target timeframe	Monthly	HR Chief
	% of grievances resolved to the satisfaction of the worker (by gender)	100%	Monthly	HR Chief
	% of community complaints relating to recruitment issues (by gender)	Negative trend of complaints relating to recruitment issues	Monthly	CLO
	% of workers with written contracts (by gender)	100%	Monthly	HR Chief
	Number of instances of sub-minimum wage payment (by gender)	Zero	Monthly	HR Chief
	Number of reported instances of delayed or unpaid wages (by gender)	Zero	Monthly	HR Chief
	Hours worked per worker per week (by gender)	No hours worked in excess of legal thresholds	Monthly	HR Chief
	Number of instances of unpaid overtime (by gender)	Zero	Monthly	HR Chief
	% of the workers received required trainings (by gender)	100%	Monthly	HSE Manager E&S Manager
	Days/hours lost to industrial action (by gender)	Zero	Monthly	HR Chief
	Number of grievances related to trade union rights or worker representation (by gender)	Zero	Monthly	HR Chief
Gender based violence and harassment	Number of GBVH allegations raised by the workforce, by type of allegation (by gender)	Negative trend over time	Monthly	Gender based focal person (SPV Social Manager or alternative person assigned as co-manager of GBVH issues)

	Number of GBVH allegations addressed during the target timeframe (by gender)	Zero GBVH allegations addressed later than the target timeframe	Monthly	Gender based focal person (as above)
	Number of GBVH allegations reported directly and via the ISP	Zero	Monthly	Gender based focal person (as above)
	% of workers who have signed Code of Conduct (by gender)	100%	Monthly	HR Chief
To protect workers, including vulnerable categories of workers such as young workers, migrant workers, workers engaged by third parties, and workers in the client's supply chain.	% of workers with legal work permit (by gender)	%100	Monthly	HR Chief
	Reported instances of child labour	Zero	Quarterly	HR Chief
	% of Legal Requirements compliance and compliance of Employment Contract Samples with IFC standards	%100	Monthly	HR Chief
To increase local employment.	% of locally recruited employees (by gender)	>%90	Monthly	HR Chief
	% of local applications (by gender)	>%90	Monthly	HR Chief
	% unskilled workers employed from affected villages (by gender)	>%5	Monthly	HR Chief
	% semi-skilled workers employed from affected villages (by gender)	>%5	Monthly	HR Chief
	% of mukhtar/ local unit informed (by gender)	>%90	Monthly	HR Chief
To avoid the use of forced labour.	Reported instances of forced labour of females or males/girls or boys	Zero	Monthly	HR Chief
	% of legal Work Permit	%100	Monthly	HR Chief
	% of Legal Requirements compliance and compliance of Employment Contract	%100	Monthly	HR Chief

	Samples with IFC standards			
Equal opportunity and non-discrimination	% of female and male workers by job category and contract type	5% of women employed for each job category by 2025 during construction. 45% of women employed for each job category by 2026 during operation.	Monthly	HR Chief
	No gap between wages for equal work scope	equal pay for equal work will be provided	Quarterly	HR Chief
	# person days (by gender)	n/a	Monthly	HR Chief
	% of jobs held by vulnerable groups[6] (by gender)	5%	Monthly	HR Chief
Worker accommodation	Quarterly independent audits of worker accommodation	100% carried out; 100% of corrective actions carried out within identified timeframe	Quarterly	Administrative Affairs Chief
	Number of reported instances of poor-quality housing (by gender)	Zero	Monthly	Administrative Affairs Chief
Audits	# of audits including sub-contractors and suppliers	%100	Monthly (REC and Sub-consultants / 6 monthly primary suppliers	HR Chief
	Results of scheduled audits (including subcontractors)	>85	Monthly (REC and Sub-consultants / 6 monthly primary suppliers)	HR Chief

H&S related KPIs are managed according to the H&S Plan. H&S manager of REC is responsible for data collection, ongoing monitoring and reporting for H&S indicators.

[6] Applicable for temporary employment; defined as low-income households, refugees, young people, ethnic minorities.

ANNEX

CODE OF CONDUCT FOR REC'S PERSONNEL

We are REC, [*enter name of REC*]. We have signed a contract with REC for [*enter description of the Works*]. These Works will be carried out at [*enter the Site and other locations where the Works will be carried out*]. Our contract requires us to implement measures to address environmental and social risks related to the Works. This includes risks associated with gender-based violence or harassment (GBVH)[7] or sexual exploitation and abuse (SEA)[8] in which REC applies a zero-tolerance policy.

The Code of Conduct (CoC) applies to all workers including our employees, labourers, contractors, suppliers and any others associated with the Project, including sub-contractor. All such persons are referred to as "**REC's Personnel"** and are subject to this CoC, which details behavior that we expect from all REC's Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

REC's Personnel shall:

1. carry out his/her duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other REC's Personnel and any other person;
3. maintain a safe working environment including by:
    - ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
    - wearing required personal protective equipment;
    - using appropriate measures relating to chemical, physical and biological substances and agents; and
    - following applicable emergency operating procedures.

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[7] GBVH is an *"Umbrella term for violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment."* Sexual harassment is *"any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment." (cited in IFC, July 2020, Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector. Available at: **www.ifc.org/addressinggbvh**)*

[8] Sexual exploitation is *"Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another."* Sexual abuse is *"the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with children (as defined by the UN Convention on the Rights of the Child as any person under the age of 18) is sexual abuse, regardless of the age of maturity or consent locally. Mistaken understanding of the age of a child is not a defence." (cited in ibid)*

4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. observe the Company Gender Policy and do not engage in any form of gender-based violence or harassment (GBVH) or sexual exploitation and abuse (SEA) with colleagues (regardless of their status) or Project-affected Communities, including, but not limited to:
    - sexual assault;
    - verbal or emotional abuse or manipulation;
    - unconsented sex/rape;
    - physical violence;
    - unwanted or forced touching of a sexual nature;
    - sexual bribery or exploitation in exchange for employment, compensation or other project benefits; and
    - trafficking or forcing individuals to engage in pornography or sex work.

    Such incidents are not tolerated by the Project. Any persons found to engage in such matters will be subject to police investigations and dismissed. Channels for reporting any form of GBVH or SEA are included in the workforce gender-sensitive grievance mechanism.
7. participate in GBVH training and events to contribute to prevention and awareness raising on such matters;
8. complete relevant environmental and social training courses, including on health and safety matters;
9. not use drink alcohol during working hours which can lead to risks for the safety of local inhabitants, consumers and personnel;
10. not use drugs including marijuana;
11. neglect or damage environment, the population or properties, particularly breaching provisions intended to prevent the spreading of Sexually Transmitted Disease (STD) and Acquired Immunodeficiency Syndrome (AIDS);
12. not give damage to the assets and interests of others, or the environment;
13. not enter property of neighbouring people without permission of the landowners or those cultivating/renting the land;
14. report violations of this Code of Conduct;
15. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the Project Grievance Mechanism; and
16. not employ people under the age of 18 in hazardous work, which may include many forms of construction activity.

Serious misconduct, and therefore instant dismissal, shall also apply if workers are found to be involved in any of the following activities: organisation of sex trade (pimping), committing pedophilia, drug trafficking, deliberate and severe pollution, trading and/or trafficking in all or part of protected species. Anyone found to be committing such offences shall be immediately dismissed as of the first report of misconduct detected, in application of the Code of Conduct and labour laws.

REC will establish a record for each case of serious misconduct, and a copy will be provided to the REC's personnel in question, indicating all action taken to terminate the misconduct by the REC's personnel in question and to bring the attention of other REC's personnel to the type

of incident detected. This record will be provided to the Implementation Consultant as an attachment to monthly progress report.

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact *REC's HR Chief or Gender Focal Person with relevant experience in handling gender-based violence, (or another individual designated by the REC to handle these matters*) in writing at this address [Şahintepe Mah. Muratdere Cad. KMO Şantiye No:134/2, Başakşehir, İstanbul, Türkiye] or in person at the same address; or
2. Call **0 800 655 10 00** to reach the REC's hotline and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by REC's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR REC'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of REC's contact person with relevant experience in handling gender-based violence*] requesting an explanation.

Name of REC's Personnel: [insert name]

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of the REC:

Signature: _____

Date: (day month year): _____