T.C. ULAŞTIRMA VE ALTYAPI BAKANLIĞI

EPC Contractor

REC ULUSLARARASI

PROJECT

NORTHERN MARMARA HIGHWAY SECTION 8 PPP PROJECT

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0	*06.04.2022*	*FIRST PUBLICATION of the Procedure in line with the holding / project standards*	*Seda BAKAN*	*Muzaffer KOÇOĞLU*	*Selim Sönmez*

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COMMUNITY HEALTH SAFETY AND SECURITY PLAN

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Abbreviations and Acronyms

CESMP	Construction Environmental and Social Management Plan
CHSSP	Community Health, Safety and Security Plan
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health, and Safety
EHSS	Environmental, Health, Safety, and Security
ESHS	Environmental, Social, Health and Safety
EPC	Engineering, Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management System
GBVH	Gender-Based Violence and Harassment
GIIP	Good International Industry Practice
HSE	Health, Safety and Environment
H&S	Health and Safety
IFC	International Finance Corporation
KPIs	Key Performance Indicators
NMM	Northern Marmara Motorway
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PS	Performance Standards (IFC)
REC	REC International
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle (Nakkaş Otoyol A.Ş.)
WHO	World Health Organization

1. PURPOSE AND SCOPE

This Community Health, Safety and Security Plan (CHHSP) was prepared by the Engineering, Procurement and Construction (EPC) Contractor “REC International” (hereafter called “REC”) which is applicable to the construction phase of the Project.

The ultimate responsibility for its implementation resides with REC, and REC’s sub-contractors & suppliers will be required to demonstrate compliance of their activities against the CHHSP. The CHSSP is intended to be ‘living document’ that can be refined and modified as situations change.

The purpose of the CHHSP is to:

- Define the potential Project related hazards and risks on the community’s health, safety and security identified during ESIA stage;
- Define the applicable legislation and standards relevant to this plan;
- Define the mitigation measures to be implemented by REC prior to and during construction activities to avoid or minimize the risks to communities;
- Determine the roles and responsibilities for those implementing the plan;
- Define the monitoring requirements;
- Determine the grievance mechanism available to the affected community;
- Ensure that safeguarding of personnel and property is conducted in an appropriate manner that avoids or limits risks to the community’s safety and security;
- Ensure safety and integrity in the design and construction of Project-related structures, preventing and minimizing accidents;
- Have effective measures in place to address and recover from emergency events, whether human-made or natural hazards;

2. LEGISLATION

The Project is required to comply with relevant Turkish laws and regulations, Lender requirements and REC plans, policies and procedures.

2.1 Applicable Turkish Laws and Regulations

Turkish occupational health and safety legislation and national standards currently in force are:

- Regulation on Protection of Buildings from Fire (Official Journal Date: 19.12.2007/26735)
- Highway Traffic Law (Official Journal Date: 18.10.1983/18195)

- Regulation on the Transport of Hazardous Substances by Road (Official Journal Date: 31.03.2007/26479)
- Waste Management Regulation (Official Journal Date: 02.04.2015/ 29314)
- Regulation on Assessment and Management of Air Quality (Official Journal Date: 06.06.2008/26898)
- Regulation on Assessment and Management of Environmental Noise (Official Journal: 07.03.2008/26809)

2.2 Applicable Lender Requirements

- EBRD Performance Requirement 4: Health, Safety and Security
- IFC Performance Standard 4: Community Health, Occupational Safety and Security,
- IFC General Environmental, Occupational Health and Safety Guidelines: 3.0 Community Health and Safety
- EBRD Sub-sectoral Environmental and Social Guidelines (i.e., Building and Construction Activities, 2010);
- The EBRD's Strategy for the Promotion of Gender Equality (2021 – 2025);
- IFC Environmental, Health, and Safety (ESHS) General Guidelines (April 2007);
- IFC Environmental, Health, and Safety Guidelines for Toll Roads (April 2007);
- IFC/EBRD Worker's Accommodation: Processes and Standards (August 2009);
- Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector jointly commissioned by IFC, EBRD, and CDC Group;

2.3 Links to Other REC Plans and Procedures

This plan is supported by the other Project plans/procedures listed below:

- Air Quality and Emission Control Plan (REC-ÇYS-KMO-PL-04)
- Blasting Management Plan (REC-İSG-ÇYS-KMO-PL-18)
- Contaminated Land Procedure (REC-ÇYS-KMO-PR-40)
- Emergency Preparedness and Response Plan (REC-İSG-ÇYS-KMO-PL-06)
- Hazardous Materials Management Plan

- Landscape Management Plan (REC-ÇYS-KMO-PL-17)
- Noise and Vibration Management Plan (REC-ÇYS-KMO-PL 05)
- Health and Safety Plan (REC-İSG-ÇYS-KMO-PL-01)
- Pollution Prevention Plan (REC-ÇYS-KMO-PL-19)
- Quarry Management Plan (REC-İSG-ÇYS-KMO-PL-11)
- Soil Management Plan (REC-ÇYS-KMO-PL-10)
- Security Management Plan (REC-İSG-KMO-PL-22)
- Traffic Management Plan (REC-İSG-KMO-PL-07)
- Waste Management Plan (REC-ÇYS-KMO-PL-02)
- Water Management Procedure (REC-ÇYS-KMO-PR-39)
- COVID-19 Emergency Response Plan (REC-İSG-ÇYS-KMO-PL-15)
- Gender Action Plan
- Stakeholder Engagement Plan
- Code of Conduct
- Zero Tolerance Policy

3. ROLES AND RESPONSIBILITIES

REC Project Manager

The REC Project Manager has the overall responsibility for the implementation of the site activities stated in this CHSSP. They will be suitably competent and have a strong understanding of construction best practice aligned with national law and applicable Lender requirements. The Project Manager is accountable for overall Health, Safety and Environmental (HSE) performance and making the human and financial resources available to ensure compliance with HSE requirements of the Contract. The Project Manager will be responsible for coordinating the internal management response of the Contractor to a major emergency. The Project Manager will also be responsible for appointing First Aid competent person(s) on site, as well as a team responsible for site security.

REC Construction Manager

The REC Construction Manager is responsible for implementation of the community health safety and security measures through method statements and site working practices. The REC Construction Manager will ensure that:

- Construction activities (undertaken by REC itself or by the subcontractors), are in compliance with this Plan and Project ESHS requirements;

- All construction staff receive appropriate safety and environmental training, prior to commencement of work;
- A thorough investigation is carried out into any accidents or incidents which may occur;
- A self-regulatory review and/or audit of implementation of the CHSSP is carried out on a regular basis.
- Workers adherence to the established Code of Conduct for worker-community interaction and on-site behaviour;
- Relevant authorities are informed immediately in case of damage to utilities such as underground and aboveground electricity lines, water lines, gas lines, oil pipelines, etc;
- The worksites are secured (secured trenches, temporary bridges, traffic controls, barricades, signs and warning lights, etc.); and
- Appropriate site boundary- and access controls are implemented near settlements to prevent unauthorized entry to construction or activity sites especially by children (e.g. fencing of construction section in the vicinity of settlements or communities).

Project H&S Manager

The Project H&S Manager has the overall responsibility for:

- Monitoring and assurance of the REC's subcontractors ESHS system performance and requirements of the Project.
- Developing the CESMP and other ESHS plans and procedures and assures that Project requirements are considered.
- Reviewing subcontractors and suppliers ESHS documentation and ensure that they are aligned with Project ESHS requirements.
- Monitoring performance through Key Performance Indicators (KPIs), reports, audits, and meetings.
- Reporting on ESHS performance to Project management, Nakkaş Otoyol A.Ş ESHS Management, and other related parties.
- Establishing Emergency Response Teams (ERT) and defining the roles and responsibilities of ERT members.
- Ensuring that all ESHS training needs are identified, provided and recorded.

- Disclosing relevant ESHS information to Project staff and the public and coordinating activities for raising awareness.

REC Community Liaison Officer (REC CLO)

- Will establish on-going communication with Project affected settlements,
- Will organize cooperation activities with related stakeholders and local communities,
- Will investigate and propose appropriate methodology (informing related departments when any grievance regarding community health and safety) for resolving grievances,
- Will review and assess the subcontractor monitoring regarding with social aspects,
- Will follow the results of complaints and report to Project Manager on a weekly, monthly and annual basis
- Will communicate with the local authority for specific project activities,
- Will participate in and delivering safety awareness training to, local school children and their parents and/or their teachers,
- Will raise community awareness of safety issues through village meetings and classroom lessons, will meet local communities in advance of construction occurring in a particular area, to describe the construction activities and to explain the dangers associated with the construction sites.

4. GENERAL RULES AND IMPLEMENTATION

For the construction phase, the following risks were identified related to community health and safety.

- Increase in noise and vibration
- Increase in dust
- Nuisance on community (dust, vibration, noise, fear) and grazing animals due to blasting activities
- Increase in road safety risks due to construction traffic (heavy machinery and other vehicles entering/leaving the construction site);
- Increase in safety risks (collisions, formwork collapses, failures during a concrete pour collapsing fall in open trenches, falling objects, risks related to construction machinery,

risks related to electricity, risks related to gas, fire and explosion risks in areas close to the residential areas due to uncontrolled access to construction site

- Increase in transmission of communicable diseases;
- Increase in risk of Gender-Based Violence and Harassment (GBVH);
- Increased pressure on healthcare; and
- Conflict with security personnel

Road Safety

- REC-İSG-ÇYS- KMO-PL-07 Traffic Management Plan will be implemented, which requires the application of appropriate speed limits, safe driving training, advanced warning of any proposed road diversions and closures, and measures to reduce the exposure of vehicle drivers, passengers and other road users to the hazards of road-related accidents.
- Drivers of Project vehicles will be trained/briefed about safe driving with respect to other drivers, pedestrians and livestock;
- All Project vehicles (including sub-contractors) will be identifiable (e.g. an easy to read/see sign or symbol on vehicles which shows that they are connected to the Project);
- The grievance mechanism will be operational and effective prior to construction and will be implemented throughout the project construction phase, with all relevant staff fully cognizant of their roles in the grievance resolution process so that quick and effective responses are provided to the concerns raised by local stakeholders.
- Monthly Road Safety Audits will be conducted in line with “EC Directive 2008/96/EC – Road infrastructure safety management” on the Project design documentation as required by the Directive.
- Ensure that construction plant and equipment will be left in a safe place, immobile and secure when not in use, and to explain how fuel tanks will be secured to prevent external access.
- **Site Trespass and Injury -** As part of the SEP, Nakkaş Otoyol A.Ş. and REC will undertake a programme of stakeholder engagement and consultation to educate local communities on the risks of blasting and trespassing onto or walking through construction sites, the meaning of signs, the risks of playing on or near equipment or entering fenced areas, and why it is important to only use dedicated pedestrian

walkways. This will include a presentation in every primary and secondary school in communities in the AoI.

- The programme will take into account especially vulnerabilities in regards to poor children. Poor children are particularly vulnerable to traffic risk, as they are less likely to receive road safety education since sometimes they do not assist school as they work as street vendors and are exposed to hazardous road risks. Special posters and culturally appropriate signs will be provided.

- A community meeting will be conducted in every settlement along the route. Records of the meeting and attendees will be kept.
- REC will provide access to health care for those injured by its activities.
- Access to the construction site will be controlled to prevent the uncontrolled transpassing or entry by unauthorized persons.
- REC will ensure that signs, fences / guards are put up around work fronts and construction sites advising people of the risks associated with trespassing. In order to reduce the likelihood of people trespassing to seek job opportunities in the Project, the site safety signage will include a warning stating that recruitment at the construction site will not be permitted. Communication of the vacancies will be announced via Project website and CLOs.

Blasting

- Blasting signs are to be conspicuously place along the edge of the blast site and area where flying debris may occur.
- Access to the blasting area will be controlled to prevent the encorachment of livestock or entry by unauthorized persons during blasting. Access will remain controlled until an authorized representative of the operator has reasonably determined that: no unusual hazards, such as imminent slides or undetonated charges, exist, and access to and travel within the blasting area can be safely resumed.
- Residents of the local communities will receive a written notification at least 30 days in advance of a nearby blasting as well as two (2) more written reminders. This notification will include the blasting schedules, as well as the name, address and telephone number of the operator; an identification of the specific areas in which blasting will take place; the dates and time periods when explosives are to be detonated; the methods to be

used to control access to the blasting areas; and the type of patterns of audible warning and all-clear signals to be used before and after blasting.

Environmental Health

- Routing of truck movements to avoid residential and noise sensitive areas will be a key avoidance/mitigation measure for community safety, Truck traffic will avoid passing through villages or other residential areas as far as practicable. Speed restrictions, vehicle maintenance and driver behavior will also comprise part of the mitigation measures. Truck routes through villages or towns will be strictly avoided during night-time hours (10pm to 5 am).

Increased Transmission of Communicable Diseases

- A Workforce Code of Conduct will be prepared detailing behavioral expectations, living and working conditions, which will contribute to a reduction in the risk of disease transmission within local communities. as well as Stakeholder Engagement Plan. The Code of Conduct will expressly prohibit sexual interactions of any kind with underage persons.
- The workforce, including contractors and subcontractors, will be provided with health awareness training, including a significant briefing on hygiene practices (such as hand washing), and to increase awareness of major communicable diseases and how to protect against infection, and about transmission routes and the symptoms of the communicable diseases of concern (including STDs and COVID-19).
- Pre-employment screening protocols will be conducted for all employees including contractors and subcontractors, which will include checks for COVID-19 in accordance with the requirements of the latest national guidance, and testing for TB and other diseases appropriate to WHO recommendations, the individual's country of origin and vaccinations
- Workers will be provided with primary health care and basic first aid at worksites.
- Regular medical check-ups and centralized medical treatment for all workers of the Project will be provided.
- Workers will be provided with sanitary facilities, which will be appropriately designed to prevent contamination.
- COVID-19 measures will be implemented in line with guidance note of Ministry of Health.

- A robust waste handling system to avoid the creation of new vector breeding grounds or attracting rodents to the area will be developed.
- Measures to reduce the presence of standing water onsite through environmental controls and source reduction will be implemented to avoid the creation of new breeding grounds for bacteria.
- It will be ensured that worker camps are kept clean and free from any accumulation of wastes as well as supplied with clean potable water.
- Appropriate safe food preparation measures will be in place. Monitoring will be undertaken to ensure that required food standards are being met.

Increased Risk of Gender Based Violence and Harassment

- All employees and contractors are required to acknowledge and adopt the environmental and social work practices and comply with all HSE procedures as well as the Workforce Code of Conduct and Zero Tolerance Policy, reporting safety hazards, unsafe work practices, unacceptable conditions, and environmental and social issues/concerns.
- All contractor contracts will include explicit references to the need to abide by Turkish law and applicable standards and policies in relation to health and safety. Furthermore, contracts will include a clause committing contractors to adhere to Nakkaş Otoyol A.Ş.' GBVH policies and procedures, which will include specific GBVH risks and agreed measures to address them, explicitly mentioning the Nakkaş Otoyol A.Ş.' zero tolerance towards GBVH.
- Employment contracts will enforce that the Workforce Code of Conduct is communicated and signed during the onboarding of employees.
- All employees will receive awareness training on the Project Grievance Mechanism.
- Training and orientation will be delivered on respecting local communities and vulnerable populations, with a special focus on gender, Human Rights and GBVH risks awareness. The training will also include clear guidelines to create a secure environment for women and children in the area, for example: actions such as catcalling people from the community or other workers will not be permitted.
- Monitoring systems will be put in place for regular reporting on GBVH, including a grievance mechanism with special provisions for GBVH grievances that include confidential and anonymous grievance reporting, referral and a support system for workers. GBVH related grievances will be managed by a gender focal point who will

have adequate specialized training on how to conduct GBVH-related investigations and provide a suitable response.

- Finally, Nakkaş Otoyol A.Ş. will conduct mappings of formal services (healthcare and counselling) and informal resources, including women's organizations.

Use of Security Personnel

- Security Management training will be provided by REC to the security personnel with regards to the requirements of Voluntary Principles for Security and Human Rights particularly focusing on respect the rights of employee, the local community and with regard to the use of excessive force
- Security Arrangements will be based on the Voluntary Principles for Security and Human Rights, which are international best practice. Security arrangements will be made transparent to the local communities. Consultation with them about the impact of arrangements will take place regularly.
- Violation of the required standards will result in corrective actions, including termination of sub-contracts with security firms. Sufficient training including clear instructions on the objectives and the permissible actions will be provided to the security personnel. The instructions will be based on the relevant Turkish law and will be communicated as terms of employment and reinforced through periodic professional training. Given regular contact with the local populations, training on the Grievance Mechanism, such as handling of community grievances will also be provided to the security staff as part of their periodic professional training.
- Complaints made by the public (or other workers) with respect to the behavior of Security Personnel can be made via the Grievance Mechanism.
- As part of the Stakeholder Engagement Plan, Nakkaş Otoyol A.Ş. and REC will have a community engagement meeting to inform local project affected people about the safety management plan and the procedures adopted. Nakkaş Otoyol A.Ş. and REC will consider and incorporate feedback and concerns of the community into the safety management plan and this plan.

5. TRAINING

This section provides the training requirements for staff involved with construction activities and provides the minimum requirements and guidance for Developers and Contractors to ensure that their training activities are carried out in compliance with this Plan.

The training program will focus on health and safety concerns that determine the best way to deal with a particular risk or hazard. When a risk or hazard is identified through the standard 'HIRA' (Hazard Identification and Risk Assessment) procedure, the intention will be to first remove the risk or hazard, and if not feasible, to train workers to protect themselves, others and the environment, against the remaining hazard. This typically involves developing induction and generic training for all employees and developing specific training goals and programs to meet specialized needs as appropriate.

The training needs have been identified for the table 1 below:

Table 1. Training Topics

	Training Needs	Include in induction training?	Training Type	Relevance to Project
Health & Safety	Safe use of equipment		Generic training	High
	Heat stress		Generic training	High
	Traffic safety	Yes	Generic training	High
	PPE	Yes	Generic training	High
	First Aid		Generic training	High
	Safety signage	Yes	Generic training	High
	Emergency procedures	Yes	Generic training	High
	Security and access control	Yes	Generic training	High
	Illness and infectious disease		Generic training	High
	Hygiene and sanitation		Generic training	High
	Working at heights		Specialized training	High
	Safe use of equipment		Specialized training	High
	Basic driver training		Generic training	High
	Advanced driver training		Specialized training	Possible
	Heavy or Specialized Machinery operator training		Specialized training	High
	Preventative measures	Yes	Generic training	High
	Rules and regulations	Yes	Generic training	High
	Nutrition awareness		Generic training	High
Others	Code of conduct	Yes	Generic training	High
	E&S awareness	Yes	Generic training	High
	Security	Yes	Specialized training	High
	GBHV		Generic training	High

6. MONITORING, ASSURANCE AND VERIFICATION

Key success indicators (KPIs) of this Plan will be monitored, verified and evaluated by the relevant parties in accordance with their responsibilities, within the scope of the REC-HSE-EYS-KMO-PR-08 HSE Monitoring, Verification and Evaluation.

REC should monitor its working activities on a regular basis to assess whether the Project is complying with legal requirements, is meeting its policy commitments, achieving established objectives and targets, and meeting key performance indicators (KPIs) as presented in Table 2 Mitigation Measures& Monitoring Requirements and Key Performance Indicators.

7. REPORTING REQUIREMENTS

The following reporting requirements apply for the EPC Contractor:

- Incident reporting (as necessary, addressed in terms of the Accident and Incident Management Procedure);
- Emergency response reporting;
- Records of annual emergency response training exercises;
- Biannual reports on KPIs and performance trends;
- Monthly reports of relevant training activities completed and attendance registers to be maintained;
- Daily/Weekly/Monthly reports of site inspection activities;
- Audit reports; and
- Inspection logs and status of non-compliances.

In addition, the following external reporting will be done:

- Monthly and biannual ESHS reports on KPIs and performance trends will be submitted to Nakkaş Otoyol A.Ş.
- All environmental and social incidents will be appropriately documented, notified and reported in accordance with established procedures.
- Incident notification and reporting to relevant Turkish regulatory bodies will be performed in line with applicable legislation in force and as stipulated in permits and licenses.
- The Lenders will be notified of incidents pursuant to the terms and conditions agreed upon in the Finance Agreements.

8. KEY PERFORMANCE INDICATORS

Table 2 Mitigation Measures& Monitoring Requirements and Key Performance Indicators

Subject	Mitigation Measures & Monitoring Requirements	Responsible Party	Key Performance Indicator
Road safety risks due to the increased construction traffic;	■ Drivers of Project vehicles will be trained/briefed about safe driving with respect to other drivers, pedestrians and livestock; ■ Advance warning will be given of any proposed road diversions and closures; ■ Project vehicles will be identifiable (e.g. an easy to read/see sign or symbol on vehicles which shows that they are connected to the Project); ■ The grievance mechanism will be implemented prior to commencement of the construction phase, with all relevant staff fully cognizant of their roles in the grievance resolution process so that quick and effective response is provided to the concerns raised by local stakeholders.	REC	■ 100% number of drivers trained and have driving license. ■ Number of Community members / stakeholders engaged with on road safety. ■ Number of community members informed of traffic route diversions. ■ Number of community meetings caried out: ■ Zero Road Traffic Accidents involving Project vehicles. ■ Zero incidents of speed exceedances. ■ Zero vehicles that fail inspections for roadworthiness. ■ Number of grievances received ■ Number of grievances resolved on time
Site trespass and injury	■ As part of the SEP, REC will undertake a programme of stakeholder engagement and consultation to educate local communities of the risks of blastings and trespassing onto sites, the meaning of signs, the risks of playing on or near equipment or entering fenced areas. This will include a presentation in every primary and secondary school in communities in the AoI. ■ A community meeting will also be given in every settlement along the route. Records of the meeting and attendees will be kept. ■ REC will provide access to health care for those injured by its activities. ■ REC will ensure that signs are put up around work fronts and construction sites advising people of the risks associated with trespassing. In order to reduce the likelihood of people trespassing to seek job opportunities in the Project, the site safety signage will include a warning stating that recruitment at the construction site will not be permitted. Furthermore, all job advertisements will clearly state no recruitment will be done on the construction site.	REC	■ Number of community members/ stakeholders engaged with site trespass. ■ 100% Warning signs are in place and in good conditions ■ Number of incidents ■ Number of accident/incident investigation carried out ■ Number of grievances received ■ Number of grievances resolved on time
Blasting	■ Blasting signs are to be conspicuously place along the edge of the blast site and area where flying debris may occur. ■ Access within the blasting area will be controlled to prevent presence of livestock or unauthorized persons during blasting. Access will remain controlled until an authorized representative of the operator has reasonably determined that: no unusual hazards, such as imminent slides or undetonated charges, exist, and access to and travel within the blasting area can be safely resumed. ■ Blasting schedules will be distributed to the users of the grazing areas, residents and local governments including the name, address and telephone number of the operator; an identification of the specific areas in which blasting will take place; the dates and time periods when explosives are to be detonated; the methods to be used to control access to the blasting areas; and the type of patterns of audible warning and all-clear signals to be used before and after blasting. ■ Residents of the local communities will receive a written notification at least 30 days in advance of a nearby blasting as well as two (2) more written reminders. This notification will include the blasting schedules, as well as the name, address and telephone number of the operator; an identification of the specific areas in which blasting will take place; the dates and time periods when explosives are to be detonated; the methods to be used to control access to the blasting areas; and the type of patterns of audible warning and all-clear signals to be used before and after blasting.	REC	■ Number of community members/ stakeholders engaged and informed about blasting ■ 100% Blasting schedules agreed with stakeholders ■ 100% Written notifications in place and recorded ■ 100% Warning signs are in place and in good conditions ■ Number of incidents ■ Number of accident/incident investigation carried out ■ Number of grievances received ■ Number of grievances resolved on time
Increased transmission of communicable diseases	■ A Workforce Code of Conduct detailing specific values, living and working conditions, which will contribute to reduce the risks of disease transmission into the community as well as a Worker Grievance Mechanism. The Code of Conduct will expressly prohibit sexual interactions of any kind with underage persons.	REC	■ Number of cases of communicable diseases in total and by disease. ■ Number of cases of vector borne diseases in total and by disease. ■ Number of cases of STDs in total and by disease.

	■ Workforce, including contractors and subcontractors, will be provided with health awareness training, including a significant briefing of hygiene practices (such as hand washing), implementation of educational outreach to increase awareness of major communicable disease and how to protect against infection and about transmission routes and the symptoms of the communicable diseases of concerns (including STDs and COVID-19). ■ Pre-employment screening protocols will be conducted for all employees including contractors and subcontractors, which will include checks for COVID-19, and testing for TB and other diseases appropriate to WHO recommendations, the individual's country of origin and vaccinations. ■ Workers will be provided with primary health care and basic first aid at worksites. ■ Regular medical check-ups and centralized medical treatment for all workers of the Project will be provided. ■ Workers will be provided with appropriate sanitary facilities, which are appropriately designed to prevent contamination. ■ COVID-19 measures will be implemented in line with guidance note of Ministry of Health[1]. ■ A robust waste handling system to avoid the creation of new vector breeding grounds or attracting rodents to the area will be developed. ■ Measures to reduce the presence of standing water onsite through environmental controls and source reduction to avoid the creation of new breeding grounds will be implemented. ■ It will be ensured that the worker camp is kept clean and free from any accumulation of wastes as well as supplied with clean potable water. ■ Appropriate food preparation and monitoring measures will be in place.Monitoring to ensure that all standards are being met by the relevant departments will take place.		■ Number of cases referred for treatment at other health facilities. ■ 100% of workers that have received pre-employment health screening. ■ Number of grievances received Number of grievances resolved on time
Increase risk of Gender Based Violence and Harassment	■ All employees and contractors are required to acknowledge and adopt the environmental and social work practices and comply with all HSE procedures as well as the Code of Conduct and Zero Tolerance Policy, reporting safety hazards, unsafe work practices, unacceptable conditions, and environmental and social issues. ■ All contractor contracts will include explicit reference to the need to abide by Turkish law and applicable standards and policies in relation to health and safety. Furthermore, contracts will include a clause committing contractors to adhere to Nakkaş Otoyol A.Ş.' GBVH policies and procedures, which could include specific GBVH risks and agreed measures to address them, explicitly mentioning the Nakkaş Otoyol A.Ş.' zero tolerance towards GBVH. ■ Training and orientation will be delivered on respecting local communities and vulnerable populations, with a special focus on gender, Human Rights and GBVH risks awareness. The training will also include clear guidelines to create a secure environment for women and children in the area, for example: actions such as catcalling people from the community or other workers will not be permitted. ■ Monitoring systems will be put in place for regular reporting on GBVH, including a grievance mechanism with special provisions for GBVH grievances that include confidential and anonymous grievance reporting, referral and a support system for workers. Workers in charge of dealing with grievances will have adequate specialised training on how to conduct GBVH-related investigations and provide a suitable response.	REC	■ 100% workers (direct employees, subcontractors, and suppliers) that have received task specific training on Gender Based Violence, Harassment and Inequalities, Code of Conduct and Zero Tolerance Policy ■ Number of grievances received ■ Number of grievances resolved on time ■ Code of Conduct in place ■ Zero Tolerance Policy in place ■ Focal point has been assigned

[1] https://covid19.saglik.gov.tr/TR-66301/covid-19-rehberi.html

Conflict between security personnel and community and workers	■ A Security Management training will be provided to security personnel. Security Arrangements will be based on the Voluntary Principles for Security and Human Rights[2] which are international best practice. Security arrangement will be made transparent to the local communities. Consultation with them about the impact of arrangements will take place regularly. ■ Violation of the required standards will result in corrective actions, including termination of sub-contracts with security firms. Sufficient training including clear instructions on the objectives and the permissible actions will be provided to the security personnel. The instructions will be based on the relevant Turkish law and will be communicated as terms of employment and reinforced through periodic professional training. Given regular contact with the local populations, training on the Grievance Mechanism, such as handling of community grievances will also be provided to the security staff as part of their periodic professional training. ■ Complaints by the public (or other workers) with respect to behaviour of Security Personnel will be managed via the Grievance Mechanism.		■ 100% security personnel (direct employees, subcontractors, and suppliers) received task specific training on Voluntary Principles for Security and Human Rights ■ Number of grievances received ■ Number of grievances resolved on time Code of Conduct in place ■

[2] https://www.voluntaryprinciples.org/