



MULTIPLE LENDERS

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Nakkaş-Başakşehir Motorway Project





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Nakkaş-Başakşehir Motorway Project

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ENVIRONMENTAL AND SOCIAL ACTION PLAN

No	Action	Environmental & Social Risks (Liability/ Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
PS1/PR1	Assessment and Management of Environmental and Social Impacts and Issues					
1.1	<p>Prepare monitoring reports from the date of signing of the loan documentation that include the status of ESAP implementation, engineering, construction progress, Environmental, Health, Safety and Social (EHSS) performance, Resettlement Action Plan and stakeholder engagement activities and resolution of grievances. These reports to include the followings:</p> <p>a) Bi-annual E&S Reports to the Lenders Submit bi-annual monitoring reports to the Lenders throughout construction and first 2 years of operation until RAP completion audit. As a minimum, the Lender's report should provide information on:</p> <ul style="list-style-type: none">Status and progress of ESAP implementation,Environmental, Health, Safety and Social (EHSS) performance and compliance against national and lender's requirements,Performance against management plan KPIs,Resettlement Action Plan (RAP) implementation status,Summary of stakeholder engagement activities and resolution of grievances (both from workers and external stakeholders) and percentage resolved satisfactorily in the reporting period (with gender disaggregation),Key H&S statistics,Any regulatory actions (i.e changes in applicable law) that can influence the Project,Status of provisions set aside for reclamation and other potential liabilities, andOther information as defined by this ESAP. <p>b) Quarterly Construction Status Update Reports to Lenders Submit quarterly progress update reports on engineering, procurement, construction, financial and E&S performance as per the Loan Agreement with Lenders.</p> <p>c) Monthly Internal and Quarterly External RAP Monitoring Reports Submit monthly internal and quarterly external RAP monitoring reports to the Lenders.</p>	<p>Management of EHSS risks in accordance with National, EU Lenders' requirements.</p>	<p>EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principles 9 and 10.</p>	<p>Nakkaş Otoyol A.Ş (SPV) with the inputs of Engineering, Procurement and Construction (EPC) and their monitoring consultants</p>	<p>a) Throughout construction and in the first 2 years of operation phases until RAP completion audit. b) Throughout construction. c) Until RAP completion audit confirms satisfactory implementation of the RAP.</p>	<p>Bi-annual E&S reports.</p> <p>Quarterly construction update reports. Monthly Internal and Quarterly External RAP monitoring reports (until RAP completion audit).</p> <p>The EHSS performance monitoring reports are to be issued by the SPV to the Lenders and the IESC in a timely manner.</p>
1.2	<p>EPC's Internal EHSS Monitoring Reports</p> <p>Review and monitor progress update reports from EPC on monthly basis on engineering, procurement, construction, resource needs, financial performance as well as implementation of E&S management plans in line with the Project Environmental and Social Management and Monitoring Plan (ESMMP), Construction Environmental and Social Management Plan (CESMP) and all other E&S Management Plans (MPs) and key issues and challenges faced during project implementation with actions planned to resolve it.</p>	<p>Management of EHSS risks in accordance with National, EU and the Lenders' requirements.</p>	<p>EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principles 9 and 10.</p>	<p>SPV</p> <p>EPC to prepare Project EHSS monitoring reports for issue to the SPV.</p>	<p>Throughout construction.</p>	<p>Monthly Project Progress reports and comments to include remedial actions (if any).</p>
1.3	<p>Independent Environmental and Social Consultant (IESC) Monitoring and Reporting</p> <p>Facilitate the assigned Independent Environmental and Social Consultant (IESC)'s EHSS monitoring visits at site to verify the compliance of Project with Lenders' requirements. The IESC's monitoring and reporting will include:</p>	<p>Management of EHSS risks in accordance with National, EU and lender's requirements.</p>	<p>EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principles 9 and 10.</p>	<p>SPV to facilitate monitoring site visits.</p> <p>IESC to monitor project progress against EHSS requirements.</p>	<p>Throughout construction and operation.</p>	<p>Quarterly EHSS Monitoring Reports to be prepared and submitted to the Lenders by IESC following each site visit during construction and bi-annual during first 5 years of operation.</p>

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	<ul style="list-style-type: none"> Construction Phase: Quarterly EHSS performance site visits and monitoring reports on implementation of ESMMP/CESMP and supportive E&S management Plans and construction progress to Lenders; and Operation Phase: Bi-annual EHSS performance monitoring site visits and reports on Operation Environmental and Social Management Plan (OESMP) implementation during the first five years of operation to Lenders. 					
1.4	<p>Environmental and Social Management System</p> <p>Maintain and implement an overarching Project Environmental and Social Management System (ESMS) appropriate for the scale and complexity of the Project and aligned with the Lenders' requirements. The ESMS will be certified to ISO 9001, ISO 14001, and ISO 45001 standards.</p> <p>The ESMS will be reviewed and updated on an annual basis, as a minimum or more frequent when significant Project and/or legislative changes occur.</p> <p>Key documents of the Project ESMS will include a minimum of Company policies, E&S management plans and procedures specified in the ESMMP and ESIA. .</p>	<p>Optimisation of EHSS management through a formalised system.</p> <p>Mitigation of site-specific E&S risks and impacts.</p>	EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principle 4.	SPV	3 months prior to recommencement of construction works.	ESMMP, CESMP and relevant management plans. ISO 9001, ISO 14001, and ISO 45001 certificates.
1.5	<p>Operation Phase Environmental and Social Management System</p> <p>Develop and implement an OESMP and relevant management plans to cover the Project's operational phase in line with the ESIA and national requirements and update the ESMS based on the operational management plans and procedures.</p>	Optimisation of EHSS management through a formalised system.	EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principle 4.	SPV and Operation and Maintenance (O&M) Contractor	3 months prior to operation.	OESMP and relevant management plans to be approved by Lenders prior to operations. Operation Phase ESMS
1.6	<p>Environmental and Construction Permits</p> <p>a) Obtain the necessary environmental and construction permits, including those that are required to be renewed. If there are any design changes, amend or obtain new permits to cover the changes in the Project, if necessary (See ESAP Action 1.10 below).</p> <p>b) Obtain operational permits (if required)</p> <p>c) Maintain a permits register during lifetime of the project</p>	Compliance with the Republic of Türkiye regulatory requirements.	EBRD PR1 and PR4, IFC PS1 and PS4 and EP4 Principle 3.	SPV and EPC	<p>a) Prior to commencing the activities for which permits are required.</p> <p>b) Prior to operation.</p> <p>c) Throughout construction and operation.</p>	Environmental and construction permits register.
1.7	<p>Environmental and Social Impact Assessment and Management</p> <p>a) Prepare an addendum to the ESIA to meet Lenders' requirements in the event that any design or route change or associated facilities become part of the Project with significant EHSS risks that warrant an EHSS assessment and/or an ESIA in accordance with Lenders' requirements, if required.</p> <p>b) Oversee and update Environmental and Social Management plans and procedures accordingly to include any design or route change, and Project associated facilities, if required.</p>	Mitigation of EHSS risks and impacts related to associated facilities.	EBRD PR1, IFC PS1 and EP4 Principle 2.	<p>SPV to prepare addendum to ESIA and oversee EPC to update Management Plans</p> <p>EPC to update Management Plans</p>	<p>a) Lender approved version prepared 1 month prior to the construction/ use of identified potential associated facilities.</p> <p>b) Lender approved version prepared 1 month prior to the construction/ use of identified potential associated facilities.</p>	<p>Supplementary EHSS assessment and/or ESIA of any Project associated facilities approved by Lenders.</p> <p>Revised management plans to cover Project associated facilities approved by Lenders.</p>
1.8	<p>Environmental and Social Management Plans for Construction</p> <p>a) Implement the following construction phase management plans in line with the Lenders' requirements and update them when necessary.:</p> <ul style="list-style-type: none"> Environmental and Social Management and Monitoring Plan (ESMMP); Stakeholder Engagement Plan (SEP); 	Optimisation of EHSS management through a formalised system.	EBRD PR1 to PR10 (excluding PR7 and PR9), IFC PS1 to PS8 (excluding PS7) and EP4 Principle 2 and 4.	SPV and EPC	<p>a) SPV throughout construction.</p> <p>b) SPV throughout construction.</p> <p>c) SPV prior to recommencement of construction works.</p> <p>d) PPrior to recommencement of construction works.</p>	<p>Monthly Project Progress reports.</p> <p>IESC Quarterly Construction Monitoring Reports.</p> <p>SPV's regular monitoring reports as per ESAP action 1.1.</p>

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	<ul style="list-style-type: none"> Gender Action Plan (GAP); Resettlement Action Plan (RAP); Biodiversity Action Plan (BAP); Contractor Management Plan; and Environmental and Social Action Plan (ESAP) <p>b) Ensure EPC implements and monitors construction phase management plans specified in the ESMMP including but not limited to:</p> <ul style="list-style-type: none"> Air Quality and Emission Control Plan Blasting Management Plan Camp Management Plan Cultural Heritage Management Plan Community Health Safety Security Plan Covid 19 Emergency Response Plan Emergency Preparedness and Response Plan Health and Safety Plan Labour Management Plan Landscape Management Plan Medical Waste Management Plan Noise and Vibration Management Plan Pollution Prevention Plan Quarry Management Plan Security Management Plan Soil Management Plan Supply Chain Management Plan Surface Water and Ground Water Management Plan Traffic Management Plan Waste Management Plan Wastewater Management Plan <p>c) Develop and implement a Community Development Plan after approval of the Lenders.</p> <p>d) Ensure EPC develops, implements, and monitors construction phase management plans and procedures that are not yet in place prior to construction in line with the Lenders' requirements. These include but not limited to:</p> <ul style="list-style-type: none"> Local Recruitment Plan Habitat Restoration and Recreation Plan Hazardous Material Management Plan 					EPC's regular monitoring reports to SPV including progress update on KPIs in each Management Plan and in ESMMP.
1.9	<p>EHSS Requirements for EPC and Sub-contractors</p> <p>Ensure EHSS requirements of the Project outlined in the ESMMP and CESMP are adopted by EPC and its subcontractors to align with national law and Lenders' requirements. These requirements to meet the below at a minimum:</p> <ul style="list-style-type: none"> Environmental and social risks and impacts are fully considered and integrated within the EPC and sub-contractor pre-qualification, selection, onboarding, management and monitoring phases. Mitigation measures, including design-based measures, surveys and monitoring requirements outlined in the ESIA, ESMMP, ESAP and E&S Management Plans including RAP and SEP made known and annexed into contracts with EPC. Ensure that EHSS responsibilities of the relevant departments involved in onboarding, management and monitoring of sub-contractors (i.e., procurement, finance, HSES teams etc.) are carried out. 	Minimisation of EHSS impacts and risks through contracts.	EBRD PR1, IFC PS1.	SPV to monitor. EPC and sub-contractor to adopt and implement.	To be included in the tendering/ procurement and monitoring process (of future contractors).	<p>Tendering documents including provisions of CESMP and EHSS management plans.</p> <p>Contractor agreements aligned with provisions in CESMP and EHSS management plans.</p> <p>Training records kept by SPV and EPC.</p>

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	<ul style="list-style-type: none"> Ensure EPC to develop procedures/method statements for the Project to manage the EHSS issues as set out in the ESMMP and CEMP. Ensure EPC to include provisions on Project's E&S requirements into its subcontractor agreements to comply with the Lender requirements and as a part of the selection process, an assessment of EHSS capacity and previous performance of subcontractors to be undertaken. Ensure EPC and its subcontractors updates management plans and procedures as necessary to include any changes or needs arising from implementation. Any such changes would be subject to SPV and lender approval. 					
1.10	<p>Design Change Management Procedure (DCMP)</p> <p>Implement the DCMP where there is any design, technical or resource changes throughout the lifecycle of the Project to ensure mitigation of any related EHSS impacts. The DCMP to include provisions for the public disclosure of material issues associated with design changes (if any) and reporting to Lenders periodically in each phase of the Project.</p>	Optimisation of EHSS management through a formalised document and associated system.	EBRD PR1 and PR10, IFC PS1 and EP4 Principle 4.	SPV/EPC SPV to obtain KGM's approval.	Throughout Project lifetime in the event of any change in design, technical or resources.	<p>Design change management procedure</p> <p>Design change register</p> <p>Final design that incorporates relevant mitigation measures.</p>
1.11	<p>EHSS Resources</p> <p>Maintain adequate and site based EHSS resources throughout the lifetime of the Project as per the ESMMP and assess the EHSS needs and update the organisational chart to strengthen the teams if and as required as per the feedback of IESC and Lenders. Appoint and maintain at minimum:</p> <ul style="list-style-type: none"> 1 SPV Deputy General Manager 1 HSSE Director 1 HSE Manager 1 Social Manager Gender expert/consultant 2 HSE Specialists 1 Deputy Social Manager / CLO 1 CLO 1 Agricultural Development Expert 1 Business Development Expert 1 Expropriation Chief 3 Expropriation Engineer E&S Supervision Consultants RAP Implementation Consultant Internal RAP Monitoring Consultant Independent Land Valuation Specialist Agricultural Consultancy Company Business Development Consultancy Company <p>Ensure that roles and responsibilities are clearly defined in their job descriptions and kept up to date.</p>	Increasing capacity and competency to manage social performance of the Project.	EBRD PR1, EBRD PR10, IFC PS1, EP4 Principle 4.and best practice.	SPV	On-board vacant positions by October 2023.	<p>Appointment of dedicated staff; timelines for recruitment and appointments with CVs in line with the resources committed in the ESMMP.</p> <p>Management and update of organogram with job descriptions of roles and responsibilities for SPV.</p>

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1.12	<p>Require and ensure EPC and all sub-contractors appoint and maintain suitably qualified EHSS personnel who are responsible for the implementation of the EHSS elements of the Project as per their scope of work in line with the ESIA and ESMMP requirements. Minimum construction contractor EHSS personnel are specified in the ESMMP and CESMP.</p> <p>Ensure that EPC appoints and maintains at minimum the following positions prior to construction:</p> <ul style="list-style-type: none"> 1 EPC Deputy General Manager 1 Project Manager 1 H&S Manager 1 E&S Manager 1 Senior Social Expert / CLO 1 CLO / Gender Focal Point 1 Chief Environmental Engineer 1 Environmental Engineer 1 Biologist 1 Archaeologist H&S team (23 members to meet the minimum requirements of OHS regulation) <p>Ensure that EPC's roles and responsibilities are clearly defined in their job descriptions and kept up to date.</p>	Ensure adequate and component resources are allocated for effective implementation of the project in line with the ESIA and relevant management plan commitments.	EBRD PR1, EBRD PR10, IFC PS1, EP4 Principle 4.and best practice.	SPV and EPC	On-board minimum 3 months prior to construction	<p>Appointment of dedicated staff; timelines for recruitment and appointments with CVs in line with the ESMMP requirements.</p> <p>Management organogram with job descriptions of roles and responsibilities for EPC.</p>
1.13	<p>EHSS Trainings</p> <p>a) Develop and implement a training plan throughout construction and operation for the relevant teams. EHSS teams as per ESMMP shall be fully trained and equipped for their roles prior to construction.</p> <p>b) Together with EPC conduct workshop(s) to provide training on contractor obligations and responsibilities of contractors on EHSS requirements prior to commencement of construction works and during construction based on a training needs assessment.</p> <p>c) Ensure EPC and its sub-contractors develop and implement training plans for their EHSS teams on EHSS requirements for effective implementation of the ESIA and E&S management plans throughout construction.</p> <p>d) Ensure an operational phase EHSS training plan is developed and implemented.</p>	Increasing capacity and competency to manage social performance of the Project.	EBRD PR1, EBRD PR10, IFC PS1, EP4 Principle 4.and best practice	<p>a-c) SPV and EPC</p> <p>d) SPV and Operation and Maintenance (O&M) Contractor</p>	<p>a-c) Prior to and during construction</p> <p>d) Prior to and during operation</p>	<p>Training plans developed and submitted to the Lenders prior to construction and operation phases.</p> <p>Training records such a list of participants etc.</p>
1.14	<p>EHSS Commitments Register and Budget</p> <ul style="list-style-type: none"> Develop an E&S commitments register as per the ESIA, ESMMP and relevant management plans as well as the national legal requirements prior to Construction and submit it to Lenders. Allocate and ensure that EPC allocates a specific budget for implementation of Project EHSS management plans based on a breakdown of constituent key elements, such as those mentioned in ESIA, ESMMP, CESMP, specific E&S management plans, RAP, SEP. Budget to be independent of CAPEX/OPEX and unaffected by other Project budgetary requirements. Set aside minimum 10% contingency for each constituent key element for unplanned remedial actions required. Submit the E&S resources allocated for management of E&S requirements as per the commitments register based on ESIA and national requirements to the Lenders prior to project signing. 	Appropriate EHSS management during Project construction and operation.	EBRD PR1, IFC PS1 and best practice.	SPV and EPC	All to be complete prior to signing of loan agreement for construction related costs and 3 months prior to operation for operational costs.	<p>E&S commitments register,</p> <p>EHSS management budget, including those mentioned in ESIA, CESMP, and management plans approved by Lenders.</p>

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1.15	Contractor Performance Monitoring Maintain and record regular EHSS inspections of contractors including environmental, social, occupational health and safety (OHS) performance, labour management and supply chain management.	Ensure contractor compliance with Lenders' requirements on EHSS	EBRD PR1, PR2 and PR4, IFC PS1, PS2 and PS4 and best practice.	SPV to carry out and report inspections. EPC and O&M Contractor to keep records with input of sub-contractors.	SPV to carry out monthly inspection reports throughout construction and operation. EPC during construction. O&M Contractor during operation.	Reported bi-annually in the E&S reports to IESC and Lenders. Monthly Project Progress reports.
1.16	Ensure EPC and contractors set-up, maintain and regularly review the Incident and Accident Register to record OHS accidents, incidents and near misses throughout the duration of the Project as required in the ESMMP. Inform Lenders on material issues (i.e., environmental incidents, labour strikes, occupational incidents, and fatalities) including third party incidents within the timeline agreed as per Loan Agreement.	Management of EHSS accidents and incidents.	EBRD PR1, IFC PS1. EBRD PR4, IFC PS4 and best practice.	SPV	Throughout project lifetime. Notification to the Lenders immediately upon the occurrence of any incident or accident. Detailed Incident investigation report to be submitted to Lenders within max. 1 month after the incident.	EHSS Incident Reporting Procedure. Regularly updated Incident and Accident Register Monthly progress reports Progress update reports provided by SPV to the Lenders as per ESAP 1.1. Notification memo(s) for each E&S incident including GBVH cases and injuries/fatalities. Detailed Investigation and root cause assessment reports
PS2/PR2	Labour and Working Conditions					
2.1	Ensure SPV's own teams, EPC, O&M contractor and sub-contractors implement the Human Resources Policy, Human Rights Policy and requirements of Labour Management Plan, as well as other relevant plans committed in the ESMMP (i.e., Camp Management Plan and Gender Action Plan) effectively to respect the rights of employees in accordance with national policy, and Lenders' requirements. This will include but not be limited to: <ul style="list-style-type: none"> HR policy and procedures to cover the fundamental principles related to workers' rights to form and join workers' organizations, collective bargaining, equal opportunities and non-discrimination, grievance mechanism, ban of child and forced labour, zero tolerance to retaliation against workers and sexual harassment and gender-based violence, provision of a safe and healthy work environment, maximizing local employment; employment benefits; privacy and data protection; worker accommodation; disciplinary measures; collective dismissals and retrenchment; and requirements for security personnel. Ensure Lenders' labour requirements are cascaded down into EPC and sub-contractors' scope of work through inclusion into tender documentation, contracts and their policy and procedures during construction and operation. Include provisions in EPC and O&M contract for penalties or other legal arrangements to ensure timely payment of wages and overtimes. Disclose the Project Human Resources Policy to all Project workers and provide training to workers on their rights and Code of Conduct principles. All Project workers (including sub-contractor workers) should be provided with clear and understandable information regarding their terms and conditions of employment through employment contracts, induction records and regular monthly reports. Ensure an effective tracking mechanism for working hours and payments (including overtime payments) is in place for all Project workers (including subcontractors) in line with the legal requirements. 	Minimise labour management related risks. Employee awareness about their labour rights, including wages, benefits, overtime.	EBRD PR2, IFC PS2, EP4, and Turkish Labour Code.	SPV EPC and sub-contractors. O&M Contractor and sub-contractors.	SPV prior to and throughout construction and operations. Internal labour audits carried out by EPC and O&M contractor monthly throughout construction and operation.	Human Resources Policy statement communicated to project workforce (including EPC, subcontractors, and core supplier workers). Training and induction records. Workforce statistics reported in the bi-annual E&S reports submitted to Lenders. Written contracts issued for all workers in a language understandable to them. Reporting on percentage of employees signing code of conduct as part of their labour contract. Internal audit check list and internal audit reports with supportive documents such as: Payrolls and working hours records. Worker's grievance records and/or court case records. Any material labour issues such as protests/strikes shall be reported to the Lenders as part of SPV's E&S monitoring reports or immediately in case of material incident.

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	<ul style="list-style-type: none"> Conduct internal monitoring of EPC and O&M management of Project workers (including sub-contractors and core suppliers), against the labour requirements of Lenders and national requirements. 					
2.2	<p>Quarterly Independent Labour Audits</p> <p>SPV to engage a third-party qualified labour auditor to conduct quarterly labour audits during construction and annual during operations to the project workforce including SPV, EPC and sub-contractors, core suppliers in line with the PR 2 and national requirements as committed in the Labour Management Plan. The audit will include review of worker accommodation camps as well as their working conditions and confidential interviews with workers and workers representatives.</p> <p>Submit the labour audit protocol and CV of the shortlisted labour auditor prior to contract signing and obtain Lenders' approval.</p> <p>SPV to report the key findings of the labour audits and corrective actions taken as part of their reporting process as per ESAP action 1.1.</p>	Reduced risk associated with labour disputes and grievances.	EBRD PR1, PR2 and PR4; IFC PS1, PS2 and PS4; and EP4.	SPV	Quarterly Labour Audit Reports throughout construction, and annual labour audits during first two years of operation.	<p>Quarterly Independent Labour Audit Reports.</p> <p>Annual labour audit reports in first 2 years in operations</p> <p>Key findings and actions are reported in the SPV's reports submitted to Lenders.</p>
2.3	<p>Workers Grievance Mechanism</p> <ul style="list-style-type: none"> Establish and implement a Worker's Grievance Mechanism (GM) covering all project workforce including SPV, EPC and subcontractors and core suppliers' workers grievances that allows for timely feedback, without any retribution and reprisal risks. Disseminate information about Worker's Grievance Mechanism's use to the workforce (in the languages understood by the workers). Appoint and train grievance officers separately to coordinate the implementation of the Worker's Grievance Mechanism Effectiveness of Worker's GM is monitored regularly and Implementation verified through evidence including worker's grievance records, training records and grievance boxes. 	Reduced risk associated with labour disputes and grievances.	EBRD PR2, IFC PS2, EP4, and Turkish Labour Code.	SPV	Throughout construction and operation.	Worker's grievance register that compiles worker grievance at all levels (SPV, EPC, sub-contractors and core suppliers).
2.4	<p>Implement the Gender Action Plan including the Gender Based Violence and Harassment Policy (GBVH) to prevent and address any form of GBVH.</p> <ul style="list-style-type: none"> Develop and implement a GBVH incident reporting procedure and disclose it to employees, including the contractors' workforce. Ensure that the workers grievance mechanism allows for raising confidential/anonymous grievances on incidents of sexual harassment in the workplace and/or Project site(s) through establishing separate confidential channels and developing specific procedures for GBVH-related grievances. Assign and train a GBVH focal point (female) to deal with GBVH related incidents and grievances. Develop response measures and support mechanisms for survivors. Provide induction training on the GBVH for all employees and contractors. Contractually require all sub-contractors to adopt a CoC covering GBVH, and to communicate these to their employees. SPV to immediately report to the EBRD's GBVH Focal Point at GBVHFocalPoint@ebrd.com on any GBVH and other gender related allegations, grievances and incidents reported to them. 	Equal opportunities and non-discrimination.	EBRD PR2, IFC PS2 and Turkish Labour Code.	SPV, EPC and sub-contractors.	<p>SPV to implement the GBVH Policy throughout project life.</p> <p>EPC to develop GBVH incident reporting procedure prior to onboarding sub-contractors.</p> <p>Training provided by SPV to EPC and sub-contractors prior to work commencement.</p> <p>EPC to appoint gender focal point prior to work commencement.</p>	<p>GBVH policy adopted by SPV, EPC and subcontractors.</p> <p>Tender and contract documentation.</p> <p>GBVH Focal Point appointed.</p> <p>Specific GBVH training log (including number of employees receiving GBVH Training).</p> <p>GBVH policy and code of conduct included into contracts of all contractors and sub-contractors and signed by all Project workers.</p> <p>Procedures for reporting GBVH-related or other confidential cases/grievances developed and implemented.</p> <p>Grievance records separated to be able to report on different categories and sensitive categories such as GBVH.</p> <p>GBVH incident memos sent to the EBRD GBVH focal point.</p>
2.5	Ensure EPC effectively implements the Camp Management Plan including the additional measures below:	Effective management of labour accommodation to reduce unsafe and	EBRD PR2, IFC PS2, – EBRD/IFC Worker Accommodation	SPV and EPC	Throughout construction.	Workforce Accommodation Plan.

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	<ul style="list-style-type: none"> EHS (including fire safety) and hygiene standards to be applied as part of the external accommodation selection criteria and monitoring including provision of first aid, clean water supplies and waste management, among others. Mitigation measures for communicable diseases i.e. COVID-19 risks, including provisions to reduce psychological effects on workers in case of quarantine and isolation requirements. If required, design of camps that are gender inclusive to avoid any potential risks to female workers. 	unsanitary living conditions.	Guidelines, best practice			<p>Documented evidence on application of the selection criteria defined in the Accommodation Plan for selection of external accommodation.</p> <p>Accommodation and camp site audit reports and inspection logs</p>
2.6	<p>Supply Chain Management Plan</p> <p>Ensure EHSS including labour risks are addressed in the whole supply chain in line with Lenders' requirements. Implementation to cover the following provisions:</p> <ul style="list-style-type: none"> Establish a responsible sourcing policy; a supplier selection criteria and procedure and ensure traceability from core suppliers through maintenance of a register of all Project primary suppliers. Ensure all core suppliers adopt self-declarations and codes of conduct regarding prohibition of any forms of forced and child labour in their operations prior to any engagement with them. Engagement clauses to be added to the agreements with suppliers in case of material non-compliance with key provisions listed in the responsible supplier policy. Monitoring procedure to ensure ongoing compliance with Project requirements, including definition of the frequency of monitoring and issues to be monitored, focusing on age of workers and presence of forced labour etc. Notify IESC and Lenders immediately if/when any forced/child labour risks or allegations are raised in relation to its core suppliers. <p>Solar supplier</p> <p>Where the total capacity of the solar plant is below 5MW, SPV to use the Green Technology Selector to choose an approved solar panel supplier. If the capacity exceeds 5MW, SPV to conduct full supply chain assessment of the solar PV supplier through an independent expert and submit the supply chain assessment report to the lenders for their approval prior to contract signing.</p> <p>In the case of change of supplier or sub-suppliers, the Lenders will be notified with a risk assessment conducted for the new supplier/s.</p>	Effective oversight of labour rights within the primary supply chain, to reduce labour violations and abuse of human rights.	EBRD PR2, IFC PS2 and EP4.	SPV and EPC	<p>EPC to implement Supply Chain Management Plan throughout construction.</p> <p>SPV to conduct full supply chain assessment of the solar power</p>	<p>Supply Chain Management Plan approved by lenders.</p> <p>Supplier Mapping</p> <p>Supplier risk assessment</p> <p>Evidence of self-declarations and codes of conduct adopted by core suppliers.</p> <p>Evidence of ongoing monitoring of core suppliers' compliance with Project commitments, as per frequency established in the plan.</p> <p>Proof of dis-engagement clauses included in supplier contracts.</p> <p>Statistics and information reported in the bi-annual E&S Reports submitted to Lenders.</p>
2.7	<p>Local Recruitment Plan</p> <p>Develop and implement a Local Recruitment Plan that ensures equal opportunities are provided to local men and women with various skill sets, and priority is given to affected vulnerable groups including poor, and workers of businesses (including migrant workers) that might lose jobs after resettlement. Consider different channels of communication to inform Project affected communities on employment opportunities, training, and promotions.</p> <p>All on-the-job and technical training to be provided free of charge by the contractor or subcontractors as per the workforce training plan.</p>	Enhance job opportunities and skills development for local communities.	EBRD PR2, IFC PS2 and EP4	SPV and EPC	Prior to and throughout construction.	<p>Local Recruitment Plan submitted to Lenders, reviewed, and approved.</p> <p>Evidence of ongoing disclosure of job opportunities and provision of skills development for local community members.</p>

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PS3/PR3	Resource Efficiency and Pollution Prevention and Control					
3.1	<p>Materials Management</p> <p>Ensure that EPC updates and implements the Quarry Management Plan to include the selection and sourcing of raw materials (aggregate, sand, gravel and crushed stone) of appropriate grade, quality and the most environmentally sustainable products within the supply chain. As a minimum, the Quarry Management Plan should ensure that:</p> <ul style="list-style-type: none"> ▪ Institutional arrangements are included between SPV and EPC on how the management and monitoring of material use is carried out; ▪ Materials are sourced from sites that have the required licences/permits in place; ▪ E&S risks are assessed on those identified sites; ▪ Due diligence for the selection of quarries that comply with national standards and good international practice (including lender's requirements); and ▪ Duty-of-care monitoring of suppliers (such as quarries) used to source Project materials. 	Improved resource efficiency.	EU EIA Directive, EBRD PR3, IFC PS3, EP4 Principle 2 and best practice.	SPV and EPC	Approved plan to be ready by November 2023 prior to construction. Implemented during construction.	Quarry Management Plan approved by Lenders.
3.2	<p>Greenhouse Gas Assessment</p> <p>Ensure that EPC undertakes a Greenhouse Gas (GHG) assessment from 2023 (full year data) to quantify and report scope 1 and scope 2 GHG emissions annually using lender requirements and include measures to reduce GHG emissions.</p>	Reduce and minimise GHG emissions.	EBRD Protocol for Assessment of GHG Emissions, EP4 Principle 10.	SPV to ensure EPC 's appointment of an external consultant to undertake the GHG assessment.	Annually	GHG emission data to be included in monthly Project Progress Reports issued to SPV. GHG emissions reported within reports to Lenders as per ESAP action 1.1.
3.3	<p>Resource Efficiency</p> <p>Ensure EPC collects resource consumption use data on water, energy, materials and waste on a monthly basis.</p> <p>Ensure EPC completes a Resource Efficiency Audit by a competent expert to cover energy use, water use, use of other resources (including materials) and the reuse, recycling and recovery of waste where available / practicable.</p> <p>Ensure EPC implements the findings of the resource efficiency audit (if any corrective actions).</p> <p>Report to Lenders resource consumption use data and audit findings in bi-annual E&S reports.</p>	Improved resource efficiency.	EU EIA Directive, EBRD PR3, IFC PS3 and best practice.	<p>EPC to collect resource consumption use data.</p> <p>EPC to appoint an external consultant to undertake the Resource Efficiency Audit</p> <p>EPC to implement Audit findings.</p> <p>SPV to report resource efficiency in bi-annual reports.</p>	<p>Monthly resource consumption data collection by EPC.</p> <p>The resources efficiency audit to be complete within the first 6 months of construction and findings implemented throughout the duration of the construction works.</p> <p>Resource efficiency information reported in bi-annual E&S reports.</p>	<p>Monthly Project Progress Report prepared for SPV – Resource Efficiency Audit and findings</p> <p>Bi-annual E&S Reports to include findings from Resource Efficiency Audit.</p>
3.4	<p>Air Quality Action and Monitoring Plan for Operations Phase</p> <p>Develop and implement an Air Quality Action and Monitoring Plan for the operation of the scheme. This can be based on passive monitoring techniques (e.g. diffusion tubes), would include dust emissions and should focus on areas of potential exposure alongside the route. The action plan should identify potential mitigation measures for operation to reduce impacts if there is a risk of exceeding air quality standards. Measures could include localised speed restrictions or the installation of physical barriers (solid or vegetation).</p>	Prevention of adverse air quality impacts.	EU EIA Directive, EBRD PR3, IFC PS3 and best practice.	SPV and O&M Contractor	Prior to operation.	<p>KPIs completed as per the requirements specified in the Air Quality Action and Monitoring Plan (to be developed for the operational phase).</p> <p>Air quality data in bi-annual reports where there are exceedances of the required standards and corrective actions need to be implemented.</p>
3.5	<p>Noise and Vibration Mitigation During Construction</p> <p>Implement the Noise and Vibration Management Plan including designing noise mitigation for specific sensitive locations as part of the motorway</p>	Prevention of adverse impacts associated with noise and vibration.	EU EIA Directive, EBRD PR3, IFC PS3 and National Legislation, the IFC	SPV and EPC during construction.	Design of mitigation measures prior to commencement of construction works.	<p>Detailed noise mitigation design report.</p> <p>Noise monitoring reports.</p>

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	<p>planning, as the level of detail of the design progresses. This should consider:</p> <ul style="list-style-type: none"> ▪ Opportunities for further landscape bunding or noise barriers should be explored to provide noise screening where appropriate to address significant noise impacts. ▪ Relevant noise barrier suppliers will need to confirm the actual design based on the actual noise measurements during construction and operation phase. ▪ Implement additional mitigation measures such as insulation of nearby building structures (typically consisting of window replacements), where required. ▪ Construction and operation activities should comply with the IFC General EHS – Noise Level Guidelines. <p>Noise and Vibration Monitoring During Operation</p> <ul style="list-style-type: none"> ▪ Undertake an assessment of anticipated noise and vibration levels during operation phase at identified sensitive receptors. ▪ Incorporate any additional mitigation and monitoring measures into the OESMP and Project design, such as locations for noise barriers to be built and low noise road surface. ▪ Implement additional mitigation measures such as noise barriers and low noise road surface, where required. 		General EHS Guidelines – Noise Level Guidelines	SPV and O&M Contractor during operation.	Implement and monitor management plan during construction and operation.	Evidence of implementation of mitigation measures where appropriate. Grievance records.
3.6	<p>Climate Change Vulnerability Assessment</p> <p>Update the Climate Change Vulnerability Assessment and incorporate the findings of the assessment into the Project design and based on the likely significance of the findings, review and update the Emergency Preparedness and Response Plan and Hazard and Risk Management Procedure accordingly.</p>	Reduce and minimise climate impacts.	EU EIA Directive, EBRD PR3, EP4 Principle 2 and best practice.	SPV and EPC	Prior to recommencement of construction works.	Climate Change Vulnerability Assessment. Findings integrated into design and the Emergency Preparedness and Response Plan and Hazard and Risk Management Procedure, if required.
PS4/PR4	Health, Safety and Security					
4.1	<p>Occupational Health and Safety</p> <p>Develop site specific health and safety risk assessments prior to construction activities and implement appropriate measures in line with the H&S management plans specified in the ESMMP and CESMP as per national legislation and Lenders' requirements.</p>	Avoid/minimise occupational health and safety risks to workers and third parties.	National OHS requirements, EBRD PR4, IFC PS4, EP4, and best practice	SPV to oversee EPC implementation. EPC to carry out assessment.	Prior to and throughout construction.	Site specific risk assessments, health and safety measures to be evidenced with photos, PPEs and training records etc.
4.2	<p>Community Health and Safety during Construction</p> <ul style="list-style-type: none"> ▪ Regularly assess effectiveness of proposed community health and safety measures if any changes in Project design or construction. ▪ Undertake appropriate measures such as fencing to avoid unauthorised access to the road, traffic management arrangements including safety campaigns to sensitive receptors, provision of controlled access for animal passes/crossing points, all blasting activities will be undertaken in close coordination with local authorities, and in consultation with project affected communities. ▪ Develop and implement enhanced mitigations based on site specific risk assessments to address the potential negative health and safety risks to vulnerable groups such as children, elderly and disabled. ▪ Ensure and include gender aspects (adequate road/pass way lighting, providing safe commuting transportation for women community 	Minimisation of community health and safety and gender risks.	EBRD PR4, IFC PS4, EP4, and best practice.	SPV EPC O&M Contractor	<p>SPV oversees and EPC implements actions identified for construction to be carried out until finalisation of design and throughout construction.</p> <p>SPV to ensure O&M contractor prepares Community Health and Safety Management Plan for operation 3 months prior to operation.</p>	<p>Report on findings of site-specific risk assessments and mitigations implemented as part of E&S reports to the Lenders.</p> <p>Operation phase Community Health and Safety Management Plan.</p>

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	<p>members during engagement sessions, gender-safety stops/panic buttons in highway stops etc.).</p> <p>Community Health and Safety during Operation</p> <p>Develop and implement a Community Health and Safety Management Plan for operations phase.</p>					
4.3	<p>Road Safety</p> <p>Consider the recommendations of the 1st Road Safety Audit (RSA) (basic design) and the upcoming three RSAs to be conducted at each of Stage 2 (Detailed design), Stage 3 (Pre-opening) and Stage 4 (Early operation) in line with the EU Directive 2008/96/EC on Road Infrastructure Safety Management with an aim to improve road safety within the Project design and construction. Where recommendations have not been accepted, a clear justification is to be made on why these cannot be implemented. All accepted recommendations will be incorporated into the final road design.</p>	Minimise accidents and incidents with road users and maintain access for local communities.	EBRD PR4, IFC PS4 and EU Directive 2008/96/EC on Road Infrastructure Safety Management.	SPV and EPC	Adjustments to final design and prior to invitation to tender for commencement of construction.	<p>Stage 2 RSA Report and Corrective Action Plan.</p> <p>Stage 3 RSA Report and Corrective Action Plan.</p> <p>Stage 4 RSA Report and Corrective Action Plan.</p> <p>Report on findings captured within the Project design.</p>
4.4	<p>Management of Blasting Risks</p> <ul style="list-style-type: none"> Ensure EPC effectively implements the Blasting Management Plan including the additional measures below: Structural building assessments to be carried out by competent independent experts at the locations where the buildings are within 50 m of significant sources of vibration and blasting prior to the activities at these areas. A document to be prepared for each of the identified buildings, which will include photographs of buildings and results of the sensitivity evaluation. In case of a third-party claim on damage to buildings, SPV to hire a third- party expert to assess the causes of the damage and develop mitigation measures to be agreed with the complainant (i.e., restoration or compensation etc. if the damage is confirmed); and SPV/EPC to prepare and implement an evacuation plan for cases where houses/structures are or can be damaged due to blasting/vibration; and assist the affected people during temporary or permanent resettlement as per RAP principles. The damage to houses and effectiveness of restoration shall be investigated and confirmed by third party experts prior to the return of affected people. 	Management of EHSS accidents and incidents.	EBRD PR1 and PR2, IFC PS1 and PS2 and best practice.	SPV and EPC	Monitoring and review throughout construction.	Reported annually in the bi-annual E&S reports to IESC and Lenders.
4.5	<p>Security</p> <p>Ensure EPC effectively implements the Security Management Plan including the additional measures below:</p> <ul style="list-style-type: none"> Conduct regular security risk assessments including security risks to third parties and implement appropriate mitigations to address security and human rights risks to workforce and third parties. Due diligence and background checks to be undertaken as part of security recruitment process. Zero tolerance policy against retaliation by security providers to be disclosed to all security officers. Facilitation of community and worker grievance mechanisms as means to submit grievances related to conduct of security personnel. Monitor activities of the security provider on regular basis through independent labour audits as per action 2.3 above. 	Minimise security and human rights risks.	IFC PS4, EBRD PR4, EP4 and best practice such as Voluntary Principles on Security and Human Rights	SPV and EPC	<p>Background checks conducted prior to security provider onboarding.</p> <p>Security Management Plan implemented throughout construction.</p>	<p>Provision of Security Management Plan including security risk assessment.</p> <p>Security Code of Conduct.</p> <p>Evidence of regular monitoring of provision of security services provided.</p> <p>Grievance records.</p> <p>Training records.</p>

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PS5/PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement					
5.1	<p>Implement the Resettlement Action Plan (RAP). Ensure that the RAP execution includes:</p> <ul style="list-style-type: none"> Completion of land acquisition activities as per the RAP implementation timeline and timely disbursement of the RAP payments by KGM and payments made under RAP Fund for costs not covered under national law by SPV in line with the RAP Fund Implementation Procedure. Regular coordination with KGM/PIU to ensure design changes or other Project developments are incorporated into KGM's expropriation programme and budget. Supporting KGM in updating the valuation study by December 2023 and annually onwards to ensure market prices are reflected in valuation and full replacement cost is paid in line with the Lenders' requirements. 	<p>Management of land acquisition and resettlement risks through a formalised document and associated system.</p>	EBRD PR5 and IFC PS5.	SPV in close coordination with KGM	<p>RAP implemented immediately until RAP completion audit is approved by Lenders.</p> <p>PIU meetings carried out monthly until RAP completion.</p> <p>Valuation study of December 2022 revisited (if necessary) in November 2023.</p>	<p>RAP and RAP budget.</p> <p>RAP Fund Implementation Procedure.</p> <p>Internal and external RAP monitoring reports.</p> <p>Payment /RAP Fund disbursement records.</p>
5.2	<p>Effective Coordination with KGM</p> <p>Coordinate and maintain regular monthly Project Implementation Unit (PIU) meetings with KGM to ensure land acquisition is implemented and status updates are presented in a timely manner as per the RAP implementation and construction schedule and in line with the national laws and Lenders' requirements.</p> <p>The PIU (joint task force formed by SPV and KGM representatives) will ensure that both KGM and SPV carry out their own responsibilities in achieving effective implementation and monitoring of land acquisition activities as defined in RAP and as per Lenders' requirements.</p> <p>PIU meetings to discuss at a minimum ("discussion items"):</p> <ul style="list-style-type: none"> Expropriation process and any key issues that may influence Project activities; Negotiation process and success rates and other consultations carried out; Progress of land registration and transfer to KGM; Court cases open and closed; Compensation payments made, pending, planned; Grievances (if any received by KGM); Issues that need liaising with other authorities; Timeline for the SPV actions required (payments from RAP fund, additional consultations carried out, implementation of LRP measures etc.). 	<p>Effective management of land acquisition and resettlement risks through a formalised system.</p> <p>Avoid any potential delays in construction</p>	EBRD PR1 and PR5, IFC PS1 and PS5 and Turkish Expropriation Law.	SPV and KGM	<p>Monthly PIU coordination meetings effective as of June 2023 and conducted monthly until RAP completion audit.</p>	<p>Monthly PIU meeting minutes containing the discussion items and key actions agreed. The frequency of meetings can be increased depending on the emergency / significance of actions that need to be carried out by KGM or SPV.</p> <p>Land acquisition status data obtained from PIU.</p>
5.3	<p>Prioritise completion of corrective actions agreed with Lenders for the lands affected during early construction phase. These actions include:</p> <ul style="list-style-type: none"> Obtaining land permits to all public and private lands already entered by EPC (on the RoW and for OHTLs) prior to Lenders' involvement in the Project but not yet formally acquired and ensure compensation payments are completed prior to the project signing with the Lenders. Making disbursements from the RAP Fund where KGM has completed expropriation for already entered lands and impacted businesses prior to Project signing. Communicating final design of Project alignment to KGM to determine land take requirements for OHTL displacements in KM 49+500 and Bahcesehir Connection Road. 	<p>Restoration and compensation of past land acquisition impacts and minimising land acquisition and resettlement risks.</p>	EBRD PR5 and IFC PS5.	<p>SPV and KGM</p> <p>All payments to be made before access is granted for construction works.</p> <p>Final design of Project alignment to be complete to assess additional impacts from OHTL displacement.</p>	<p>Evidence of payments to those lands affected by the current construction works prior to land entry.</p> <p>Inheritance transactions complete before Article 8 invitations are sent by KGM.</p>	<p>Grievance records related to past land acquisition.</p> <p>Title deeds transferred to project and records of compensation payment made with documented evidence.</p> <p>Records of permits obtained.</p>

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5.4	Make available and disseminate Guide to Land Acquisition and Compensation (GLAC) in local languages during ESIA disclosure and during future consultations with affected people and verbally explain their rights under the national expropriation law and as per Lenders' requirements prior to expropriation taking place by KGM.	Increased awareness on Project benefits through diversified engagement tools	EBRD PR 5, IFC PS5, EBRD PR 10, and IFC PS1	SPV and KGM	GLAC to be published and distributed prior to expropriation and throughout RAP implementation where necessary. GLAC to be made available on Project website	GLAC Availability of GLAC on Project website.
5.5	Ensure consultation and negotiation meetings are held with project affected people prior to any court process as per Lenders' requirements with an aim to acquire land through consent agreements. Immediate expropriation process is used as a last resort in line with the RAP only if negotiations fail and if there is need for urgent expropriation based on construction timeline. Ensure transfer of deeds are finalised for heirs of impacted assets before KGM's invitation to negotiation is sent and before any court process is initiated. Ensure Project's financial support is used effectively to resolve transfer of rights and ownership from deceased owners through awareness campaigns in affected communities.	Maximising number of negotiated settlements.	EBRD PR 5, IFC PS5, EBRD PR 10, and IFC PS1	SPV and KGM	Prior to Article 8 notifications being sent.	Records of land acquisition consultation and negotiation meetings with affected communities and businesses. Number of consent agreements/court cases. Number of deeds transferred to heirs identified. Number of heirs assisted and provided financial support to resolve inheritance transactions.
5.6	Ensure land entry and exit is carried out by EPC through Land Entry and Land Exit Protocols (LEPs).	Prevention/ minimisation of land acquisition impacts	EBRD PR 5, IFC PS5, EBRD PR 10, and IFC PS1	SPV to oversee the process. EPC to apply protocols.	Land entry after payment of compensation to right holder. Land exit after reinstatement of land to its pre-project status.	Land entry and exit protocols signed. Internal RAP monitoring reports.
5.7	Avoid forced eviction in physical resettlement cases. Carry out timely and robust engagement activities to comply with the resettlement procedures defined in the Expropriation law and specified in the RAP. Ensure that the relocation process of all affected owners of houses and businesses are completed prior to land entry in line with the RAP and resettlement assistance is provided to households and businesses as per RAP.	Prevention/ minimisation of land acquisition impacts	EBRD PR 5, IFC PS5, EBRD PR 10, and IFC PS1	SPV and KGM	Durations specified in RAP for relocation of houses and businesses and prior to granting access to land.	Records of compensation payment made with documented evidence. Records of RAP engagement activities.
5.8	Ensure EPC immediately repairs or provides alternative solution in case they damage the water or electricity supply or any other critical infrastructure. Ensure EPC fully reinstates pathways, other local infrastructure and agricultural land entered temporarily to at least their pre-Project condition upon the completion of construction.	Prevention/ minimisation of land acquisition impacts	EBRD PR 5, IFC PS5, EBRD PR 10, and IFC PS1	SPV and EPC	Prior to signing land exit protocols for each individual case.	Reinstatement activity log. Land exit protocols.
5.9	Conduct monthly internal monitoring of RAP to follow and assess RAP implementation progress against monitoring indicators and time schedule. Internal monitoring to be based on regular visits conducted on site, PIU meetings held with KGM, consultations carried out with other stakeholders and review of relevant RAP implementation records including grievances.	Management of land acquisition and resettlement risks.	EBRD PR5, IFC PS5.	SPV	Monthly as of July 2023.	Monthly internal RAP monitoring records and reports submitted to Lenders as per ESAP action 1.1.

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5.10	Ensure effectiveness and outcomes of RAP implementation is monitored externally on a quarterly basis by qualified independent RAP Monitoring consultant commissioned. The RAP Monitoring shall include confidential interviews with affected people and businesses on RAP implementation.	Independent monitoring of land acquisition and resettlement risks.	EBRD PR5, IFC PS5.	SPV	Quarterly from Q3 2023 until the RAP Completion Audit is approved by lenders.	Quarterly external RAP monitoring reports submitted to Lenders as per ESAP action 1.1.
5.11	Prepare and submit to Lenders a Land acquisition and Resettlement Execution Report to verify that RAP implementation is complete, and the Project is ready to undergo the RAP completion audit in line with the RAP. The Execution Report shall be developed in line with the format to be agreed with the Lenders.	Internal monitoring of land acquisition and resettlement risks.	EBRD PR5	SPV	Upon completion of all RAP implementation activities.	RAP internal and external monitoring reports. Land acquisition and Resettlement Execution Report in a format to be agreed with Lenders
5.12	Recruit an independent consultant to carry out the RAP Completion Audit to be approved by Lenders Confirm that the provisions of RAP including livelihood restoration measures implemented are fully met to the satisfaction of the Lenders and assess overall RAP implementation performance. The Completion Audit to indicate any open and unresolved issues with regards to RAP implementation and present a corrective action plan (if required).	Independent monitoring of RAP implementation performance.	EBRD PR5, IFC PS5.	Independent RAP Completion Audit Consultant approved by Lenders and commissioned by SPV. SPV and KGM to carry out corrective actions (if any).	Carried out once, after all inputs in the process, including any developmental initiatives, have been completed.	RAP Completion Audit. Reported in the quarterly monitoring reports until RAP completion audit.
PS6/PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources					
6.1	Bat Surveys Undertake additional bat surveys within Project Aol at suitable locations as informed by the Project ECoW/biodiversity specialist. This is required to address gaps in the baseline studies and ensure that any roosts identified can be mapped in order to inform targeted construction mitigation as described within CESMP.	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV EPC Ecological Clerk of Works (ECoW)	Pre-construction.	Additional Bat Survey results. CESMP.
6.2	Botanical Surveys Undertake additional botanical surveys to identify additional rare/endemic plant species outside of construction footprint but within Aol, within suitable habitat (as informed by the Project ECoW/botany specialist. This is required to inform ongoing monitoring of air quality impacts during construction and operation. Findings to be updated in CESMP.	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV EPC ECoW	3 months prior to recommencement of construction works.	Additional botanical survey results. CESMP.
6.3	Bird Flight Activity Monitoring Design and complete a monitoring programme of bird flight activity around the cable stayed bridge, to ensure that the proposed mitigation is effective in this regard. Should any results suggest the impact to birds is greater than predicted, then immediate consultation should be undertaken with Lenders (i.e. within 48 hrs) to agree an appropriate approach to mitigation. Update findings in CESMP.	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV/EPC ECoW	Throughout operation in years 1-3 – i.e. from the point of the bridge having been constructed (and then requirement for further monitoring reviewed).	Annual monitoring to be included as a specific KPI within CESMP Table 10.1. Annual monitoring reports to be produced, including any adaptive management recommendations required to be implemented to ensure no significant residual effects to birds.
6.4	Constraints Mapping Conduct pre-construction mapping of the exact location of where impacts will be occurring should be completed in order to ensure effective and targeted application of mitigation measures. This should then be cross-referenced with CESMP mitigation measures.	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV/ EPC ECoW	3 months prior to recommencement of construction works.	Constraints/mitigation mapping to be produced and included within updated CESMP, with updates reviewed and approved by Lenders.

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6.5	Habitat Restoration and Recreation Plan Develop and implement the Habitat Restoration and Recreation Plan (HRRP)	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV and EPC ECoW	3 months prior to recommencement of construction works.	HRRP to be approved by Lenders
6.6	Pre-construction mitigation measures Further information should be provided in the CESMP to explain why the lack of pre-construction mitigation for areas where construction had already commenced, does not represent a compliance issue.	Compliance with Lenders' requirements.	EBRD PR6, IFC PS6, EP4 and best practice.	SPV and EPC ECoW	Pre-construction.	CESMP updates to be approved by Lenders
PS8/PR8	Cultural Heritage					
8.1	Cultural Heritage Management Plan (CHMP) Ensure that cultural heritage consultations with potentially affected communities and relevant institutions in proximity to Project components in accordance with the programme set out on the CHMP. Prepare and include a cultural heritage constraints map within the existing CHMP. Adhere to the avoidance strategy set out in the CHMP.	Compliance with Lenders' requirements	EBRD PR8, EBRD PR10, IFC PS1 and IFC PS8.	SPV and EPC (with the support of cultural heritage experts as required)	Consultations carried out throughout construction. Constraints map prepared prior to construction.	Consultation records on cultural heritage in line with SEP. Constraints map. CHMP Chance Find Procedure
8.2	Chance Find Procedure (CFP) Update Chance Find Procedure (CFP) with a clear chain of authority and the relevant contact details of the person/organisation required to be notified in the case of a chance find.	Compliance with Lenders' requirements	EBRD PR8, IFC PS8 an best practice.	SPV and EPC	Prior to construction.	CFP
8.3	Archaeological Consultant Ensure a suitably qualified archaeological consultant (sub-contractor) is employed to undertake the proposed scheme of archaeological mitigation, including any archaeological evaluation of identified sites that cannot be avoided by the Project, as described in the CHMP (and CFP). This scheme is to be overseen by the relevant competent authority (Istanbul Museum).	Avoidance or minimisation of impacts to identified archaeological sites, in compliance with Lenders' requirements and Turkish legislation.	EBRD PR8, IFC PS8 and National legislation	SPV/EPC (with the support of cultural heritage experts as required)	Prior to construction (phased, if required).	Archaeological evaluation reports prepared by consultants.
8.4	Building Infrastructure Surveys Identify built heritage receptors through completion of historic buildings survey (in conjunction with relevant competent authority) and carry out regular monitoring of vibration risks to identified receptors within 50m of significant sources of vibration that has been outlined in the Noise and Vibration Management Plan.	Avoidance or minimisation of impacts to identified archaeological sites, in compliance with lender requirements and Turkish legislation.	EBRD PR8, IFC PS8 and National legislation	SPV/EPC (with the support of cultural heritage experts as required)	Prior to construction (phased, if required).	Building infrastructure survey reports.
PR10	Information Disclosure and Stakeholder Engagement					
10.1	Stakeholder Engagement Plan (SEP) Implement SEP (including grievance mechanism), review, and update as necessary, when changes occur in the Project. Engagement and consultations carried out under SEP to: <ul style="list-style-type: none"> Prioritise engagement with vulnerable groups (i.e. affected women, children, house owners, businesses and their employees, land users) to inform about Project impacts and benefits such as job opportunities and livelihood restoration support. Engagement activities to consider special needs of certain impact groups. 	Minimisation of reputational risks and impacts through inclusive, timely, transparent, and open dialogue with project stakeholders including project affected people, vulnerable groups, NGOs working with vulnerable groups etc.	EBRD PR10, IFC PS1, EP4 and best practice	SPV and EPC CLOs regular engagement activities. SPV and KGM to communicate land acquisition and livelihood restoration related rights and benefits to impacted PAPs and businesses.	Update SEP as and when necessary. Implement SEP including two grievance mechanisms throughout Project life. Update Stakeholder Engagement Registers monthly throughout Project life. Land acquisition and livelihood restoration related engagement to	Updated SEP with supporting documentation (i.e. minutes of meetings etc.) Stakeholder Engagement Register Monthly internal monitoring reports. Engagement and consultations reported in bi-annual progress reports under Stakeholder Engagement and Consultation section to IESC and Lenders. Employment records.

No	Action	Environmental & Social Risks (Liability/ Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<ul style="list-style-type: none"> Ensure regular coordination with local authorities, NGOs, Worker representatives and elected village leaders and media as necessary. 				commence prior to land acquisition works and continue 1 year after RAP implementation finalised.	Internal RAP monitoring reports.
10.2	<p>ESIA and Other E&S Instruments Disclosure</p> <p>Implement the ESIA disclosure strategy outlined in SEP to ensure that information is communicated in a transparent and inclusive manner allowing for meaningful two-way communication.</p> <p>Prepare and disclose a Public Consultation and Disclosure Report based on comments and feedback received from stakeholders during 60-day disclosure period together with the final ESIA package.</p>	Information dissemination and continuous engagement with affected stakeholders.	EBRD PR10, IFC PS1, EP4 and best practice	SPV	Public Consultation and Disclosure Report prepared once after 60-day public disclosure of the ESIA Package.	Public Consultation and Disclosure Report.
10.3	<p>Community Grievance Mechanism</p> <p>Maintain and implement the grievance mechanism for external stakeholders. Ensure grievances are recorded, addressed and resolved in a timely manner to the satisfaction of the complainants as committed per SEP.</p> <p>Ensure availability of Project-specific grievance mechanism is communicated to all impacted people and interest groups.</p> <p>Communicate Project's zero tolerance policy against any form of retaliation towards people /CSOs raising concerns and complaints with employees, communities, local authorities and implement measures to avoid such cases.</p> <p>Disseminate information to local communities and GBVH service providers on the availability of the Project's GBVH reporting protocol separate from the project level grievance mechanism to ensure safety and security of the survivors by respecting their privacy.</p> <p>SPV to immediately report to the EBRD's GBVH Focal Point on any GBVH allegations, grievances and incidents reported to them as per ESAP action 2.4.</p>	<p>Effective feedback and grievance management.</p> <p>Information dissemination and continuous engagement with affected stakeholders.</p> <p>Management and minimising risks of GBVH incidents</p>	<p>EBRD PR10, IFC PS1, EP4.</p> <p>IFC/EBRD/CDC Good Practice Guide on Addressing GBVH, for the Private Sector.</p>	<p>SPV to maintain grievance mechanisms with support of EPC.</p> <p>SPV to update SEP regularly.</p>	Effective immediately and throughout the Project.	<p>SEP.</p> <p>Grievance Registers.</p> <p>Grievance mechanism details disseminated publicly in Project brochures, headmen offices, GBVH service providers and other communication platforms.</p> <p>Stakeholder Engagement Register.</p> <p>Minutes of meetings held with women and service providers.</p> <p>Immediately when a GBVH incident is received by SPV or EPC or contractor.</p>

Appendix A

ABBREVIATIONS



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

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



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